

COMMUNITY INPUT

PUBLIC PARTICIPATION AND CONSULTATION

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



APPENDIX 3C

COMMENT LETTERS D - R
ADOPTED ON SEPTEMBER 3, 2020



PUBLIC PARTICIPATION AND CONSULTATION

APPENDIX 3C
COMMENT LETTERS D - R

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APPENDIX 3C

COMMENT LETTERS D – R

Affiliation	Submittal ID	Page No.
Diamond Bar Pomona Valley Sierra Club Task Force	0001543	1
Friends of Harbors Beaches and Parks	0001535	62
Friends of Harbors Beaches and Parks	0001536	74
Friends of Harbors Beaches and Parks	0001537	86
Friends of the Whittier Hills Association	0001430	98
Friends of the Whittier Hills Association	0001541	99
Garreth Wybenga	0001540	100
Henry Fung	0001404	101
Hills for Everyone	0001539	112
Holly Osborne	0001346	129
Leadership Counsel for Justice and Accountability	0001544	130
Leadership Counsel for Justice and Accountability	0001545	139
Los Angeles County Business Federation	0001524	148
Los Angeles County Metropolitan Transportation Authority	0001311	152
Los Angeles County Metropolitan Transportation Authority	0001312	167
Los Angeles County Metropolitan Transportation Authority	0001344	169
Los Angeles County Metropolitan Transportation Authority	0001347	171
Los Angeles County Metropolitan Transportation Authority	0001450	173
Los Angeles County Metropolitan Transportation Authority	0001454	174
Los Angeles County Metropolitan Transportation Authority	0001559	176
Marven Norman	0001522	181
Marven Norman	0001523	186
Natural Lands Coalition	0001519	191
Orange County Business Council	0001487	199
Orange County Council of Governments	0001465	208
Orange County Council of Governments	0001467	272
Orange County Council of Governments	0001468	336
Orange County Council of Governments	0001469	400
Orange County Council of Governments	0001475	464
Orange County Council of Governments	0001476	528
Orange County Council of Governments	0001479	592
Orange County Council of Governments	0001480	656
Orange County Council of Governments	0001482	720

APPENDIX 3C

COMMENT LETTERS D – R

Affiliation	Submittal ID	Page No.
Orange County Council of Governments	0001484	784
Orange County Council of Governments	0001485	848
Orange County Council of Governments	0001486	912
Orange County Council of Governments	0001488	976
Orange County Council of Governments	0001490	1040
Orange County Council of Governments	0001491	1104
Orange County Council of Governments	0001493	1168
Orange County Council of Governments	0001494	1232
Orange County Council of Governments	0001495	1296
Orange County Council of Governments	0001497	1360
Orange County Transportation Authority	0001498	1424
Orange County Transportation Authority	0001499	1465
Orange County Transportation Authority	0001500	1470
Orange County Transportation Authority	0001501	1511
Orange County Transportation Authority	0001503	1552
Orange County Transportation Authority	0001504	1593
Orange County Transportation Authority	0001505	1634
Orange County Transportation Authority	0001507	1675
Orange County Transportation Authority	0001508	1716
Orange County Transportation Authority	0001510	1757
Orange County Transportation Authority	0001512	1798
Orange County Transportation Authority	0001514	1839
Orange County Transportation Authority	0001516	1880
Public Health Alliance of SouthernCalifornia	0001383	1921
RailPAC	0001472	1926
Rail Propulsion Systems LLC	0001471	1930
Responsible Land Use	0001478	1934
Riverside County Transportation Commission	0001473	1936
Riverside County Transportation Commission	0001474	1939
Riverside County Transportation Commission	0001528	1942



phone

Diamond Bar – Pomona Valley Sierra Club Task Force

January 24, 2020

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

RE: Comments for PEIR, Natural & Farmlands Conservation

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments 2020 Regional Transportation Plan and Sustainable Community Strategy, collectively called *Connect SoCal*.

The Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter, has worked since 2018, to recognize, conserve and restore wildlife habitats, corridors and natural resources in the City of Diamond Bar and surrounding areas. We wholeheartedly believe in first, “doing no harm” to existing natural lands conditions, whilst prioritizing “natural climate solutions” through the conservation and restoration of local green belts, watersheds, residential landscapes, parks and open spaces. Our task force is proud to participate in the growing SCAG plan coalition in 2020.

The Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter, is a community service/public benefit non-profit group, serving Los Angeles County, and the cities of Diamond Bar, Pomona, Walnut, Rowland Heights, La Verne, Claremont, San Dimas, Glendora and Chino Hills. Our mission is to educate, advocate environmental literacy and ecological integrity at the local level in conserving wildlife habitats, natural landscapes, watersheds, wetlands, California Native residential gardens, public parkland and natural open spaces.

We have had important successes since our inception, including the official mapping of rare and endangered species (California Gnatcatcher, Cactus Wren, Golden Eagle) in the City of Diamond bar, and creating a conservation element report: City of Diamond Bar Biological Resources Report by Hamilton Biological, which informs the city’s 2040 General Plan update.

We offer the following comments on the Natural and Farmland policy, goals, and next steps.

Natural Communities Map Correctives

At reviewing the PEIR and Natural & Farmlands habitat, special status species and wildlife movement maps, we noticed your data does not include the latest, updated biological information for the City of Diamond Bar, SEA 15 and the surrounding natural land areas.

We request that your drafts be corrected and updated by referring to the attached biological report and map, “City of Diamond Bar Biological Resources” report and “City of Diamond Bar, Natural Communities” map, dated February 25, 2020. These documents are referred to in the city’s recently adopted General Plan 2040 and are on record with the California Dept. Fish Wildlife Region 5 and the United States Fish and Wildlife Service.

Most notable updates should include the special status species “California Gnatcatcher,” which maps an old, established populations distributed throughout the city due to its quality coastal scrub habitats.

Prioritizing Natural Climate Solutions

We are pleased to see conservation of our natural and agricultural lands as one of the 10 main policies of Connect SoCal. Land preservation not only reduces greenhouse gas (GHG) emissions, but also sequesters carbon. Any investment in habitat restoration improves this sequestration potential as well. Natural lands (*green infrastructure*) are a proven “natural climate solution” and key to preserving quality of life and authentic community sustainability. We believe including land conservation is a step in the right direction. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

Mechanisms for Saving Natural Open Spaces – Wildlife Habitats

Our organization supports the idea that as new growth occurs it should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe. However, the Plan fails to outline precisely how (or with what conservation mechanism) these fringe lands (or any lands) will actually be

protected. Relieving pressure by focusing development elsewhere, does not automatically conserve or protect natural lands. A growing alliance of numerous organizations, including ours, focus work on protecting important habitat lands. Much time, energy, money, strategy, and political will are combined to create a successful conservation transaction that leads to permanently-conserved lands. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.

The Benefits of Conservation

Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, protection of cultural and archeological sites, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands also filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water resources.

Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain ecological functions, be sustainable over the long term, and include plans for long-term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Natural landscapes are neglected due to regarding landscapes from only “aesthetic uses” attitude. Realizing the big picture by ensuring open spaces are connected to one another is essential for species survival and building authentic, sustainability. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as drought, fire, flood or landslide, and improve the resiliency in the face of climate extremes impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors *prior to commencing* impactful projects.

Coastal & Riparian Assets

Many non-profits are working to ensure additional bays, estuaries, wetlands, bluffs, and beaches are preserved forever. Additionally, one way our coasts are connected to inland areas are through our watersheds, rivers and streams. These riparian areas serve as recreational trail corridors, water recharge and infiltration locations, and serve as places our wildlife use for watering sources. However, transportation and land use generated urban runoff are still problems. Our beaches and coastline are inundated with pollution. Litter, debris, and pollutants should be decreased prior to reaching the coast. Ensuring everyone has a positive experience on the sand and in the surf should be our goal, but we need to address Southern California's trash problem.

The Benefits of Habitat Restoration

California is one of 36 biodiversity hotspots on earth! This means, the unique ecosystem diversity of our state is rare and one of the most threatened by human activities. The health of California ecosystems affects the globe for good or ill, as well as local communities.

One key way to improve the environment is through restoration projects. These can be on land, in riparian areas, and even in the ocean. Restoration provides benefits by adding native plants, removing the non-native plants and their seedbank, as well as increasing carbon storage, and providing improved habitats for our wildlife. Our environment benefits from these improvements, as do our watersheds, our air, and our communities. Having improved habitats means that our water is cleaner, our soils won't erode as easily, it creates jobs for local residents, and our unique biodiversity is maintained. Further, the many endemic and threatened/endangered plants and animals benefit from these restoration projects as well. Thank you for including restoration as a key component in the natural lands and agricultural policy.

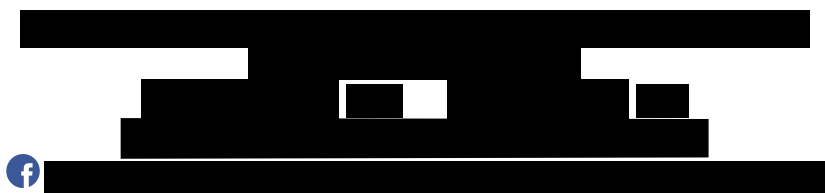
Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I am available at your convenience. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to

Sincerely,

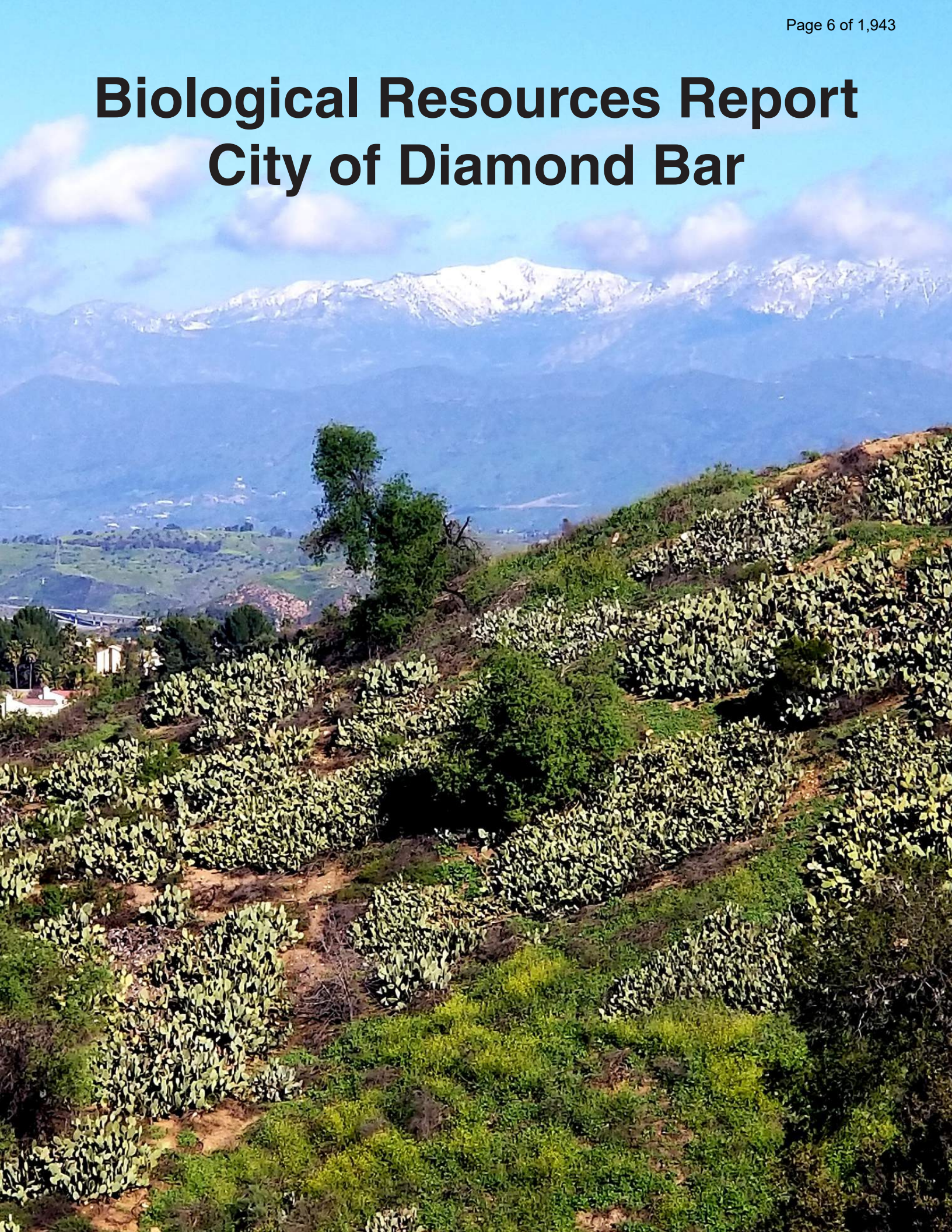
Robin Smith

C. "Robin" Smith, Chair

Resources & Attachment: Hamilton Biological, "City of Diamond Bar Biological Resources Report" + "City of Diamond Bar, Natural Communities map"



Biological Resources Report City of Diamond Bar



“This work is dedicated to the City of Diamond Bar, to its residents --- especially the children.”

Dedicated & Funded by a consortium of Diamond Bar residents and:

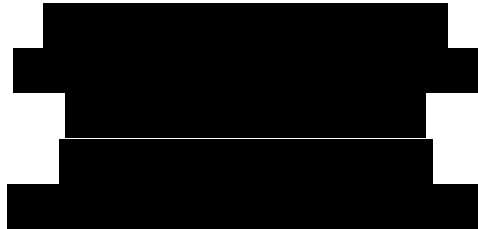


Cover Photo by Diamond Bar Resident, Eraina Olson, 2019.
Photos for Resource Protection Recommendations, by Robert Hamilton 2019.

February, 2019

**Biological Resources Report
City of Diamond Bar**

Prepared By



February 25, 2019

TABLE OF CONTENTS

TABLE OF CONTENTS.....	II
INTRODUCTION.....	1
METHODS & TECHNICAL INFORMATION	2
VISIONS, GOALS, OBJECTIVES.....	2
HISTORY & LAND USE	5
SCENIC RESOURCES	5
HYDROLOGY/WATERWAYS.....	6
DIAMOND BAR WATERSHEDS	8
FLOODING.....	9
BIOLOGICAL RESOURCES	9
NATURAL COMMUNITIES.....	9
Annual and Perennial Grasslands, Vernal Pools/Seasonal Pools	10
Coastal Sage Scrub, Cactus Scrub.....	10
Chaparral	11
Coast Live Oak Woodland, Savannah	11
California Walnut Woodland, Savannah	11
Riparian Scrub and Woodlands.....	12
Human-altered Habitats	12
NATURAL OPEN SPACE AREAS.....	12
RESOURCE PROTECTION RECOMMENDATIONS	17
SENSITIVE RESOURCES	19
Sensitive Natural Communities	20
Special-Status Species	20
EFFECTS OF DEVELOPMENT ON BIOLOGICAL RESOURCES.....	29
EDGE/FRAGMENTATION EFFECTS ON WILDLIFE MOVEMENT	30
Wildlife Movement Issues in the Puente-Chino Hills.....	30
NATURAL RESOURCE CONSERVATION POLICIES.....	32
GOALS AND POLICIES OF THE OPEN SPACE AND CONSERVATION ELEMENT.....	32
LITERATURE CITED	34

FIGURES

1: Waterways 6
2: Lower San Gabriel River Watershed 7
3a: Natural Open Space Areas, Part 1 13
3b: Natural Open Space Areas, Part 2 14
3c: Natural Open Space Areas, Part 3 15
3d: Natural Open Space Areas, Part 4 16

TABLES

A: Resource Protection Recommendations..... 17
B: Special Status Species..... 22

APPENDICES

A: Methods & Technical Information

INTRODUCTION

Hamilton Biological, Inc., was retained by a consortium of Diamond Bar residents to prepare this biological resources report addressing the conservation and preservation of sensitive biological resources in the City of Diamond Bar (City) and its Sphere of Influence. It is intended that the City incorporate the information and analyses in this report into the next update of its general plan, currently in preparation.

Sections 65302(d) and 65302(e) of the California Government Code states that a city's general plan shall include goals and policies for management of open spaces, including natural lands and recreation areas. The Open Space Element addresses such categories as preservation of natural resources and managed production of resources. The Conservation Element addresses protection and maintenance of natural resources, including soils, water, plants, wildlife, and mineral resources. Recognizing that the subjects covered under the Open Space Element and Conservation Element substantially overlap, Appendix 1 to the California Government Code allows these two elements to be combined in one section of the General Plan.

The Open Space and Conservation Element identifies and describes the irreplaceable biotic resources that make up the natural environment that people rely upon for breathable air, clean water, viable populations of native plants and wildlife, and the natural beauty that pervades and defines Diamond Bar. The Open Space and Conservation Element guides city decision-makers and the public in their efforts to take the natural world into account during deliberations over development proposals, as required to realize the overall vision laid out in the General Plan.

The Open Space and Conservation Element guides the development and implementation of programs involving conservation of open space, biological resources, visual resources, and parks and recreation. Approaches for managing environmental impacts are identified, with particular emphasis on contributing to achievement of the General Plan's stated goals, including:

- Create and retain an open space system which will conserve natural resources, preserve scenic beauty, promote a healthy community atmosphere, provide open space for outdoor recreation, and protect the public safety.
- Identify limits on the natural resources needed to support urban and rural development within the City and its Sphere of Influence, and ensure that those resources are used wisely and not abused.
- Provide a park, recreation and open space system which enhances the livability of urban and suburban areas by providing parks for residential neighborhoods; preserving significant natural, scenic, and other open space resources; and meeting the open space and recreational needs of Diamond Bar residents.

Methods & Technical Information

Please refer to Appendix A, which describes the methods for preparing this biological resources report, as well as providing technical information that underpins the analyses, conclusions, and policies contained herein.

Visions, Goals, Objectives

The General Plan identifies “a strongly held goal among the residents to **maintain and protect the distinctive physical attributes of Diamond Bar which make it a desirable place in which to live.**” To achieve this overarching goal of safeguarding open spaces and significant natural features, as well as retaining the City’s distinctive natural character, the Open Space and Conservation Element focuses on supporting the following visions, goals and objectives, building upon language contained in the original 1995 General Plan:

- **Vision 1.** Retention of the rural/country living community character. There is a strong, long-held goal among residents to maintain and protect the distinctive, physical attributes of Diamond Bar which make it a desirable place in which to live, through a careful balance of housing, businesses and services, public facilities, and preservation of natural environmental resources.
- **Vision 2.** Preservation of open space. Significant privately and publicly owned natural lands that remain in Diamond Bar and its 3,591-acre Sphere of Influence support numerous rare species and perform important ecological functions. The preservation of sensitive natural resources contributes to the goal of retaining the City’s distinctive rustic character and offers unique educational and recreational opportunities. The County of Los Angeles has identified the Sphere of Influence and adjacent lands, some of which lie within the City, as Significant Ecological Area (SEA) 15. SEA 15 is recognized as a major significant ecological asset to the community. The City will play a proactive role in the preservation of SEA 15 by assuring that extensive analysis and review precede any changes from its current uses and possibilities.
 - **Goal 1.** Consistent with the Vision Statement, maintain a mix of land uses which enhance the quality of life of Diamond Bar residents, providing a balance of development and preservation of significant open space areas to assure both economic viability and retention of distinctive natural features of the community.
 - **Objective 1.1** Establish a land use classification system to guide the public and private use of land within the City and its Sphere of Influence.
 - **Objective 1.2** Preserve and maintain the quality of existing residential neighborhoods while offering a variety of housing opportunities, including mixed land uses.

- **Objective 1.3** Designate adequate land for retail and service commercial, professional services, and other revenue generating uses in sufficient quantity to meet the City's needs.
 - **Objective 1.4** Designate adequate land for educational, cultural, recreational, and public service activities to meet the needs of Diamond Bar residents.
 - **Objective 1.5** Maintain a feeling of open space within the community by identifying and preserving an adequate amount of open land.
 - **Objective 1.6** Consistent with the Vision Statement, provide flexibility in the planning of new development as a means of encouraging superior land use by means such as open space and public amenities.
- **Goal 2.** Consistent with the Vision Statement, manage land use with respect to the location, density and intensity, and quality of development. Maintain consistency with the capabilities of the City and special districts to provide essential services which achieve sustainable use of environmental and manmade resources.
- **Objective 2.1** Promote land use patterns and intensities which are consistent with the Resource Management Element and Circulation Element.
 - **Objective 2.2** Maintain an organized pattern of land use which minimizes conflicts between adjacent land uses.
 - **Objective 2.3** Ensure that future development occurs only when consistent with the availability and adequacy of public services and facilities.
- **Goal 3.** Consistent with the Vision Statement, maintain recognition within Diamond Bar and the surrounding region as being a community with a well-planned and aesthetically pleasing physical environment.
- **Objective 3.1** Create visual points of interest as a means of highlighting community identity.
 - **Objective 3.2** Ensure that new development, and intensification of existing development, yields a pleasant living, working, or shopping environment, and attracts interest of residents, workers, shoppers, and visitors as the result of consistent exemplary design.
 - **Objective 3.3** Protect the visual quality and character of remaining natural areas, and ensure that hillside development does not create unsafe conditions.

- **Goal 4.** Consistent with the Vision Statement, encourage long-term and regional perspectives in local land use decisions, but not at the expense of the Quality of Life for Diamond Bar residents.
 - **Objective 4.1** Promote and cooperate in efforts to provide reasonable regional land use and transportation/circulation planning programs.
- **Goal 5.** Consistent with the Vision Statement, recognize that oak trees, oak woodlands, and associated habitats have intrinsic aesthetic, environmental, ecological, wildlife, and economic values; that conservation of oak-dominated landscapes is important to the health, safety and general welfare of the citizens of Diamond Bar¹; that that the General Plan must contain adequate policies to protect the oak habitats from unnecessary damage, removal or destruction; that native oak trees should be planted, where appropriate, to enhance or restore damaged or degraded oak woodland habitats and mitigate unavoidable losses.
 - **Objective 5.1** Protect and extend the diversity of oak woodlands and associated habitats (defined as lands on which the majority of the trees are of the genus *Quercus*) through site design and land use regulations.
 - **Objective 5.2** Reduce in scale, redesign, modify, or if no other alternative exists, deny any project which cannot sufficiently mitigate significant adverse impacts to oak woodlands.
 - **Objective 5.3** Encourage property owners to establish Open Space Easements or deed restrictions for areas containing oak woodlands, and to allow access to enable scientific study.
 - **Objective 5.4** Encourage concentration of development on minimum number of acres (density exemptions) in exchange for maximizing long term open space.
 - **Objective 5.5** As a mitigation option, allow as a condition of development approval, restoration of any area of oak woodland that is in a degraded condition, with the magnitude of restoration to be commensurate with the scope of the project. This may include planting of oak trees and removal of non-native species, with consideration for long-term viability, management, and protection, and/or modification of existing land uses. The object of habitat restoration shall be to enhance the ecological function of the oak woodland and to restore it to a condition where it can be self-sustaining through natural occurrences such as fire, natural hydrological processes, etc.

¹ Woodlands are defined as lands with tree cover of at least 10%, and oak woodlands exist where the majority of trees are of the genus *Quercus*.

History & Land Use

Set within the Puente Hills of southeastern Los Angeles County, the City of Diamond Bar covers 14.9 square miles. Neighboring cities include Walnut, Pomona, Industry, La Puente, Rowland Heights, Brea, and Chino Hills. The region now occupied by Diamond Bar was inhabited by the Kizh people until the mid-eighteenth century, when the Spaniards settled in the area, establishing Mission San Gabriel in 1771 (City of Diamond Bar and Diamond Bar Historical Society 2014; Housing element 2014). The land experienced a series of ownership changes involving various land grants and purchases (e.g., the Los Nogales Grant; purchases by Luz Linares, Vejar and Palomares, Louis Phillip, Frederick E. Lewis II, William Bartholome), eventually growing into one of the largest and respected ranches in southern California and gaining its name. This lasted until 1956, during which two subsidiaries of Transamerica Corporation (Christiana Oil Corp and the Capital Oil Company) purchased the area, aiming to make it among the first and largest master-planned community in Los Angeles County (City of Diamond Bar and Diamond Bar Historical Society 2014).

Despite initial intentions as a “master-planned” community, uncoordinated patterns of development through the late twentieth century have introduced areas of incongruence, such as single- and detached multi-family residential tracts being established alongside limited commercial and other non-residential sections. Most suburban construction was already established prior to the city’s incorporation in 1989, and commercial development has continued expand within the city limit. A few blocks away from the primary arterials (57 and 60 Freeways) the majority of retail and housing space is largely concealed by the natural topography, contributing to Diamond Bar’s quiet, semi-rural character and pleasant atmosphere.

Scenic Resources

Today, Diamond Bar is primarily a hillside residential community, composed of steep and moderate sloping hills separated by ridges and flat plateaus. Although most of the land was developed prior to the city’s incorporation, its remaining natural hillsides and ridgelines provide a picturesque backdrop and strong visual ties to the area’s long history of ranching. The views from these natural areas comprise powerful and valuable scenic resources, adding ambiance and aesthetics that give Diamond Bar a unique and compelling visual identity. In addition, views of trees, rolling hills and the pine- and often snow-covered peaks of the San Gabriel Mountains are visible in the distance from the 57 and 60 Freeways.

Planning decisions must recognize the existing aesthetic value of the city’s open space as well as the external viewsheds of the surrounding region. These include the oak and walnut wooded ridgelines, unique topography, and natural open spaces at the edges of the community.

HYDROLOGY/WATERWAYS

Diamond Bar lies within of the San Gabriel River watershed, which is the largest watershed in the drainage system of the San Gabriel Mountains at 441,000 acres (Lower San Gabriel River Watershed Group 2015). The San Gabriel River is one of seven major watersheds partly or completely within Los Angeles County. Most of the river lies in southeastern Los Angeles County, but a portion of this watershed originates in northern Orange County. The northern portion of the San Gabriel River, where it emerges from the mountains, has retained some natural features, such as a sandy bottom and native vegetation. Farther south, however, flood-control and channel stabilization measures needed to accommodate intensive urbanization led to the river being lined with concrete (US Army Corps of Engineers 1991; Neal 2011).

Water runs through Diamond Bar via numerous channels, creeks and canyons. A small part of the northwestern part of the city drains to the San Gabriel River via the San Jose Creek channel, which follows the route of Valley Boulevard west from Diamond Bar. Most of Diamond Bar drains south to the San Gabriel River through the Coyote Creek watershed (see Figure 1).

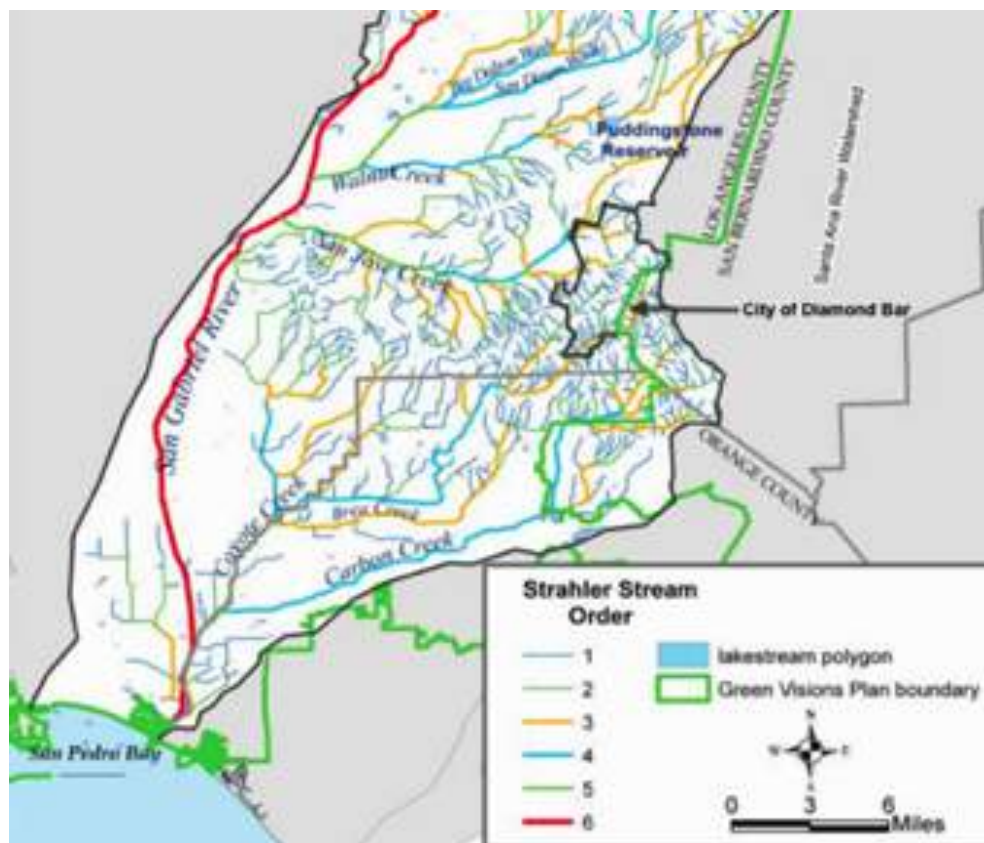


Figure 1, Waterways. Diamond Bar lies mostly within the watershed of Coyote Creek, but the northwestern part of the city discharges to the west, through the San Jose Creek channel.

Source: National Hydrology Dataset. <http://www.horizon-systems.com/nhdplus/NHDPlusV1download.php>

Coyote Creek and San Jose Creek drain approximately 165 square miles and 83 square miles, respectively, of highly urbanized commercial, residential, and industrial zones, plus limited natural open space areas (Sheng & Wilson 2000, using Horton–Strahler Stream Order).

In 2013, Diamond Bar joined 12 other cities and the Los Angeles County Flood Control District to develop a Watershed Monitoring Program (WMP) and Coordinated Integrated Monitoring Program (CIMP) to address the lower portion of the San Gabriel River, which includes Reaches 1 and 2 of the San Gabriel River Watershed and portions of Coyote Creek that originate from jurisdictions within Los Angeles County, including the City of Diamond Bar. A small portion of Diamond Bar that discharges to the San Gabriel River via San Jose Creek is also addressed by this CIMP. See Figure 2, below.

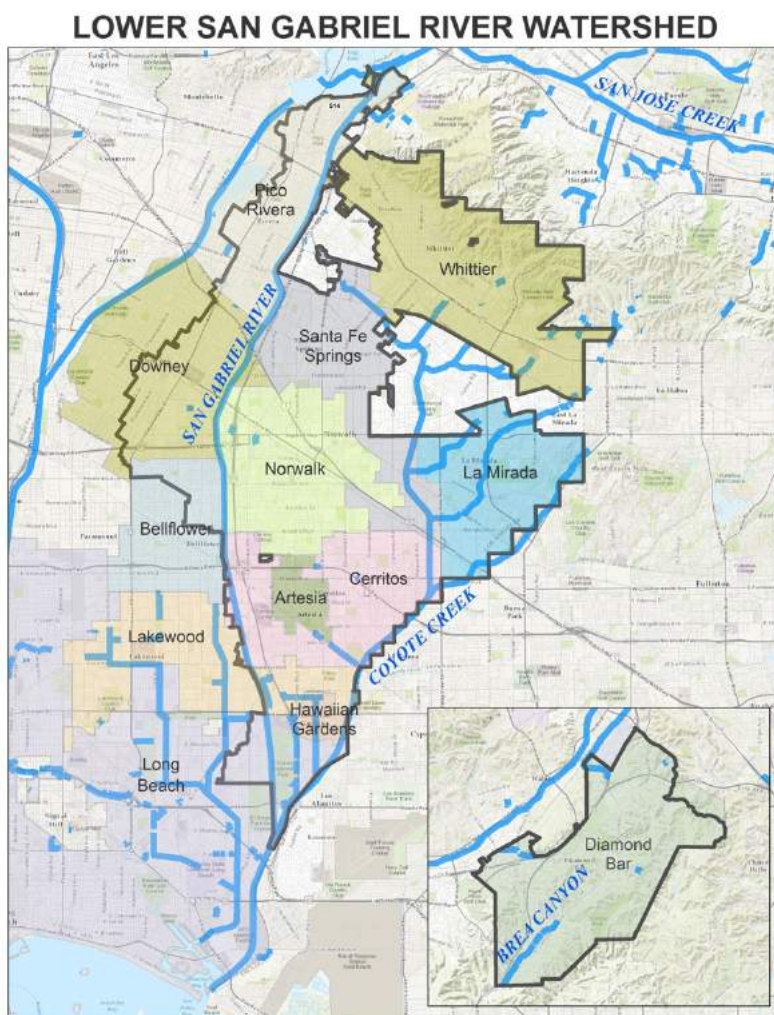


Figure 2, Lower San Gabriel River Watershed. Diamond Bar occupies the most northeasterly part of the Lower San Gabriel River Coordinated Integrated Monitoring Program.

Source: Gateway Water Management Authority. <https://gatewaywater.org/services/lmgr/>

Diamond Bar Watersheds

Diamond Bar is served by four watersheds, all with some channelization/urbanization: Tonner Canyon Creek, Diamond Bar Creek, Brea Canyon Creek, and San Jose Creek. Each system supports riparian habitat that provides resources for protected/special-status species. The following discussions describe each of these four drainage systems.

1. Tonner Canyon

With a watershed of 5,000 acres and very little development, Tonner Canyon ranks among the most ecologically significant, unchannelized, largely undisturbed drainages in the Los Angeles area (HFE 2018). Occupying parts of Los Angeles, San Bernardino and Orange Counties, Tonner Canyon drains the southeastern side of Diamond Bar and the northwestern side of the City of Chino Hills. The flow rate, controlled by natural rills, gullies and washes, varies throughout the year. The canyon's headwaters lie in a bowl of low hills just south of Diamond Ranch High School. Roughly 1.4 miles downstream, Grand Avenue cuts across the watershed, and just downstream from that road crossing lies the small Arnold Reservoir. Below the reservoir's dam, water flows southwest through natural open space lands the City of Industry has purchased from the Boy Scouts of America in recent years. After flowing for approximately a mile through open, rolling hills, the creek then enters a narrower canyon, with steeper hills on either side. At that point, the willow-, sycamore-, and oak-dominated riparian vegetation becomes more developed. The creek flows another six miles south and west to empty into Brea Creek, located near the 57 Freeway in the Coyote Creek drainage basin of Orange County.

2. Diamond Bar Creek

Originating in the neighborhoods west of Diamond Ranch High School, Diamond Bar Creek runs approximately 1.2 miles to the west, through Sycamore Canyon Park, and then continues west of Golden Springs Road through Diamond Bar Golf Course, and from there underneath the 57 and 60 Freeways, to a channel east of the freeway that is tributary to San Jose Creek. The upper segment, from Leyland Drive through the Sycamore Canyon Park, supports well-developed native sycamore/oak/willow riparian woodlands. The segment passing through Diamond Bar Golf Course supports broken, partially native riparian habitat.

3. Brea Canyon Creek

The southwestern part of Diamond Bar, including the "Brea Canyons" neighborhood east of the 57 Freeway, drains south toward Coyote Creek via Brea Canyon Creek. Most of this watershed is fully developed within the limits of Diamond Bar, but the southernmost portion, near the terminus of Castle Rock Road, is a soft-bottomed perennial creek that supports riparian vegetation.

4. San Jose Creek - South Branch/Fork

Located at Diamond Bar's northwestern edge, the southern branch of San Jose Creek is a concrete-lined, trapezoidal channel that collects a small portion of urban runoff that is discharged north of the intersection of Sunset Crossing Road and North Diamond Bar Blvd. Runoff collected from catch basins drains west toward San Jose Creek in the City of Industry. At the eastern terminus of Back Lot Lane, in the City of Walnut, lies very small patch of riparian vegetation consisting of native and exotic trees and shrubs.

Flooding

Flood insurance maps issued by the Federal Emergency Management Agency (FEMA)², showing areas that may be subject to flooding in 100-year storm events, indicate that Diamond Bar is at low risk for major flood events. Only a limited section of the City, located north of SR-60 (Reed Canyon Channel at Brea Canyon Road and Lycoming Street) are a slightly elevated flood potential. Surrounding areas at potentially elevated risk of flooding include locations north of the 57 Freeway (across Baker Parkway) and an area covering roughly 2,000 acres near the border with Pomona.

An extensive system of concrete-lined drainages, many of which are independent of the natural streambeds, carries runoff through the City. Areas considered to be at elevated risk of flooding may require maintenance of drainage channels, which can include removal of native wetland and riparian vegetation, to maintain the flow of water through the stormwater system. Diamond Bar's generally low risk for flooding allows for native riparian vegetation to be retained in natural streambeds, which can develop into important habitat for various wildlife species.

BIOLOGICAL RESOURCES

Natural Communities

This section briefly describes the Natural Communities (also known as "plant communities" or "vegetation types") that occur in Diamond Bar and its Sphere of Influence (i.e., Tonner Canyon/Significant Ecological Area 15, located in unincorporated Los Angeles County south of the city limits). The following discussions of Natural Communities refer to Natural Open Space Areas in the City and its Sphere of Influence, which are mapped subsequently (see Figures 3a-3d, starting on page 12). Please refer also to Appendix A, which describes the State-recommended methods used to classify Natural Communities for this report.

² Los Angeles county Flood Zone Definitions, See <http://dpw.lacounty.gov/wmd/floodzone/docs/FZDLegend.pdf>

ANNUAL AND PERENNIAL GRASSLANDS, VERNAL POOLS/SEASONAL POOLS

Natural Open Space Areas: 1, 2, 6, 8, 10, 13, Sphere of Influence

The bottom of Tonner Canyon supports extensive grasslands. Most alliances of the widespread “California annual grassland” are not identified as Sensitive by CDFW, as they generally represent areas disturbed over long periods (e.g., by grazing) that no longer support many native plant species. Among the most prevalent alliances in the Diamond Bar area is “annual brome grassland.” Dominant species include ripgut brome (*Bromus diandrus*), foxtail brome (*Bromus madritensis* ssp. *rubens*), wild oats (*Avena fatua*), foxtail barley (*Hordeum murinum* ssp. *leporinum*), shortpod mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), wild radish (*Raphanus sativus*), Italian thistle (*Carduus pycnocephalus*), and tocalote (*Centaurea melitensis*). Some disturbance-adapted native forbs, such as common fiddleneck (*Amsinckia intermedia*) and arroyo lupine (*Lupinus succulentus*), may also occur.

Areas of perennial grassland, distinguished by possessing non-trace cover of native grasses, are identified as Sensitive by CDFW. As examples, the *Nassella* spp. – *Melica* spp. herbaceous alliance is characterized by having at least 2–5 percent cover of native needlegrass (*Nassella* spp.) or other native grasses³; and the *Bromus carinatus* – *Elymus glaucus* herbaceous alliance has California brome (*Bromus carinatus*) characteristically present, with native plants providing more than 10 percent relative cover.⁴ It is likely that vernal pools/seasonal ponds occur in the site’s grasslands, and/or along dirt roads that pass through other Natural Communities.

Special-status species known to occur in Diamond Bar’s grasslands, or that have potential to occur there, include Catalina mariposa lily (*Calochortus catalinae*) small-flowered microseris (*Microseris douglasii* ssp. *platycarpha*), Golden Eagle (*Aquila chrysaetos*), and Grasshopper Sparrow (*Ammodramus savannarum*).

COASTAL SAGE SCRUB, CACTUS SCRUB

Natural Open Space Areas: 1, 4, 7, 8, 10, Sphere of Influence

Hillsides throughout the Puente Hills support stands of coastal sage scrub and cactus scrub, and this includes the dry, exposed slopes of Diamond Bar. Dominant native shrubs species in coastal sage scrub include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), coyote brush (*Baccharis pilularis*), laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), and blue elderberry (*Sambucus nigra* ssp. *caerulea*). Within the Study Area, cactus scrub is dominated by a combination of coastal prickly-pear (*Opuntia littoralis*) and shrubs characteristic of coastal sage scrub. The CDFW recognizes most of these scrub/cactus

³ <http://vegetation.cnps.org/alliance/536>

⁴ <http://vegetation.cnps.org/alliance/499>

alliances as Sensitive Natural Communities⁵ in their own right, and they often support special-status plant and/or wildlife species, such as intermediate mariposa lily (*Calochortus weedii* ssp. *intermedius*), Hubby's phacelia (*Phacelia hubbyi*), Coastal California Gnatcatcher (*Polioptila californica californica*), and Cactus Wren (*Campylorhynchus brunneicapillus*).

CHAPARRAL

Natural Open Space Areas: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, Sphere of Influence

On Diamond Bar's north- and east-facing slopes, coastal sage scrub is replaced by taller and denser shrubs and trees with greater requirements for moisture and shade. The mosaic consists of three main Natural Communities: chaparral, oak woodland, and walnut woodland. The lowland form of chaparral found in the study area is dominated by such species as laurel sumac (*Malosma laurina*), toyon (*Heteromeles arbutifolia*), sugarbush (*Rhus ovata*), chaparral honeysuckle (*Lonicera subspicata*), and blue elderberry (*Sambucus nigra* ssp. *caerulea*). Special-status species associated potentially found in chaparral in Diamond Bar include Fish's milkwort (*Polygala cornuta* var. *fishiae*) and the San Bernardino Ringneck Snake (*Diadophis punctatus modestus*).

COAST LIVE OAK WOODLAND, SAVANNAH

Natural Open Space Areas: 1, 3, 4, 6, 7, 8, 10, 11, 12, Sphere of Influence

Coast Live Oak Woodland, several associations of which are recognized as Sensitive by CDFW, is characterized by stands of coast live oak (*Quercus agrifolia*), and in some areas Engelmann oak (*Quercus engelmannii*), often growing together with chaparral and walnut woodland, on Diamond Bar's north- and east-facing slopes, as well as in the bottoms of some drainage courses. Oak savannah, characterized by scattered oaks growing in grassland, occurs in limited pockets and may be associated with human disturbance of oak woodlands. Coast live oaks are valuable to a variety of native wildlife, and are frequently utilized by nesting owls and hawks. Special-status species that may be found in oak woodlands in the Study Area include the Southern California Shoulderband Snail (*Helminthoglypta tudiculata*), Trask's Shoulderband Snail (*Helminthoglypta traskii*), and Long-eared Owl (*Asio otus*).

CALIFORNIA WALNUT WOODLAND, SAVANNAH

Natural Open Space Areas: 1, 2, 4, 5, 6, 10, 12, Sphere of Influence

This Natural Community, recognized as Sensitive by CDFW, is characterized by stands of southern California black walnut (*Juglans californica*) growing in association with chaparral and coast live oak woodland on Diamond Bar's north- and east-facing slopes. Walnut savannah, characterized by scattered walnuts growing in grassland, occurs in limited pockets and may be associated with human disturbance of walnut woodlands.

⁵ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609>

Special-status species that may be found in walnut woodlands and walnut savannah in Diamond Bar include the species indicated previously for oak woodlands and chaparral.

RIPARIAN SCRUB AND WOODLANDS

Natural Open Space Areas: 1, 4, 5, 6, 7, 8, 10, 12, 13, Diamond Bar Golf Course, Sphere of Influence

Various forms of riparian scrub and woodland, nearly all of them recognized as Sensitive by CDFW, grow along streambeds in Diamond Bar. The dominant vegetation consists of willows, such as arroyo willow (*Salix lasiolepis*) and red willow (*S. laevigata*), mulefat (*Baccharis salicifolia*), California sycamore (*Platanus racemosa*), coast live oak (*Quercus agrifolia*), southern California black walnut (*Juglans californica*), and blue elderberry (*Sambucus nigra* ssp. *caerulea*). Special-status species that may be found in riparian woodlands in Diamond Bar include the rough hedge-nettle (*Stachys rigida* var. *rigida*), Western Pond Turtle (*Emys marmorata*), Yellow-breasted Chat (*Icteria virens*), and Yellow Warbler (*Setophaga petechia*).

HUMAN-ALTERED HABITATS

Developed areas, such as turfed/landscaped parks and the Diamond Bar Golf Course, generally do not support Natural Communities, but these areas may nevertheless play important ecological roles. For example, the golf course includes large number of ornamental trees that comprise a non-native woodland that supports a wide variety of resident and migratory native birds, presumably including nesting raptors, and the man-made lake provides habitat for migratory and resident ducks and other waterfowl.

Natural Open Space Areas

Figures 3a-3d, starting on the next page, depict 13 areas of extensive (>25 acres) native/naturalized habitat in Diamond Bar. Also depicted are Diamond Bar Golf Course and Tonner Canyon/Significant Ecological Area 15, within the city's Sphere of Influence. The figures also show potential habitat connections/choke points for wildlife movement between blocks of natural open space. Figures 3a-3d provide a basis for generally characterizing the existing ecological conditions within Diamond Bar and its Sphere of Influence, without accounting for such distinctions as the boundaries of parklands or private lots.

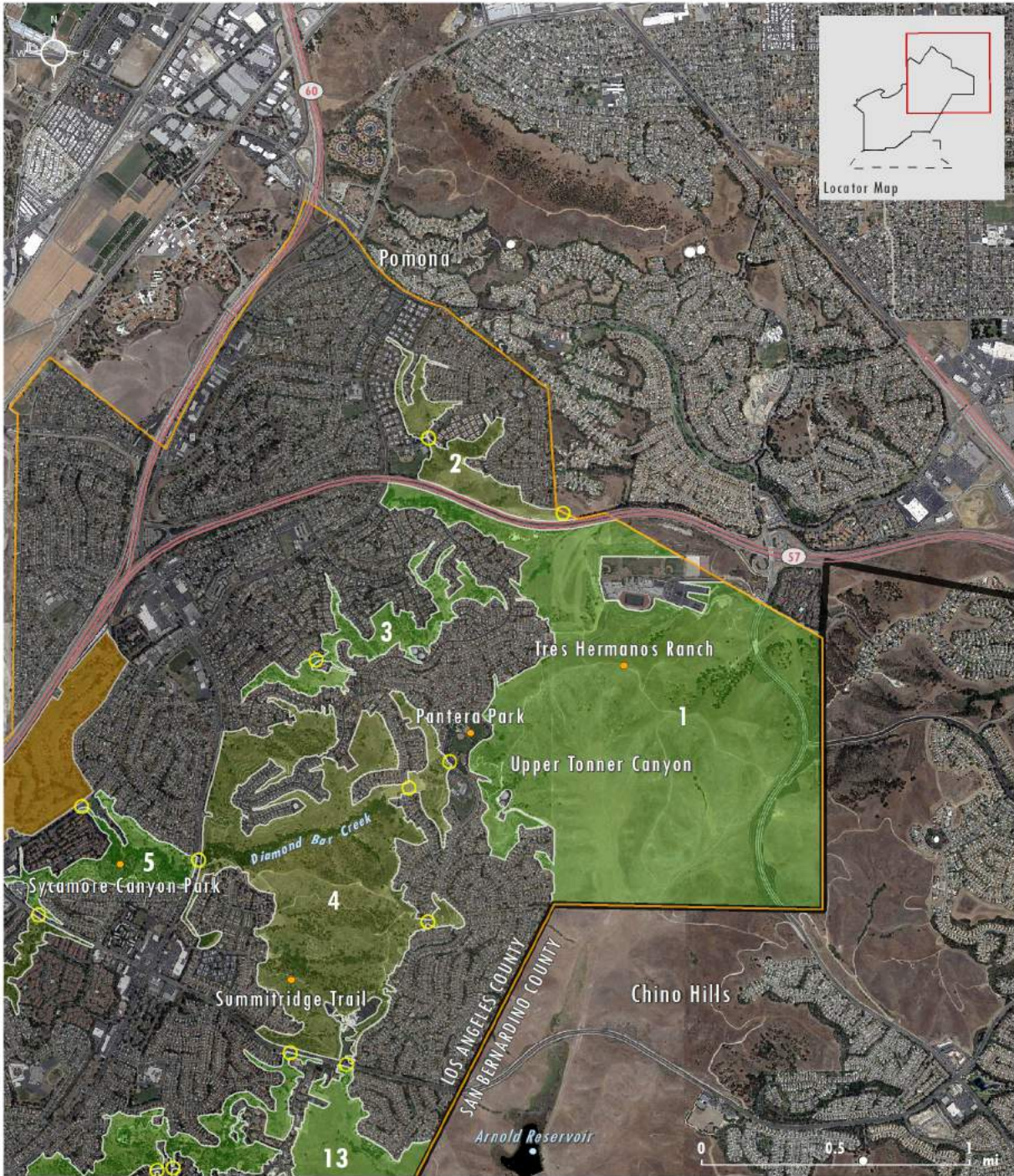


Figure 3a. Natural Open Space Areas

- | | |
|---|---|
|  Diamond Bar City Limits |  Natural Open Space Area |
|  Sphere of Influence |  SEA 15 |
|  Diamond Bar Golf Course |  Potential Habitat Linkages/Choke Points |
|  County Line | |



HAMILTON BIOLOGICAL
 World Image Basemap (Clarity) from ESRI, 2017. North American Primary Roads from ESRI, 2018. County Boundary from USGS. Diamond Bar City Limits, Significant Ecological Area (SEA prior OVOV / AV / GP adoption) Digitized from Los Angeles County, 2015. Map Projection: Universal Transverse of Mercator. Datum: WGS84. Map Scale 1:38,000. Graphic Scale Units: Miles.



Figure 3b. Natural Open Space Areas

- | | | | |
|---|-------------------------|---|---|
|  | Diamond Bar City Limits |  | Natural Open Space Area |
|  | Sphere of Influence |  | SEA 15 |
|  | Diamond Bar Golf Course |  | Potential Habitat Linkages/Choke Points |
|  | County Line | | |



HAMILTON BIOLOGICAL

World Image Basemap (Clarity) from ESRI, 2017. North American Primary Roads from ESRI, 2018. County Boundary from USGS. Diamond Bar City Limits, Significant Ecological Area (SEA prior OVOV / AV / GP adoption) Digitized from Los Angeles County, 2015. Map Projection: Universal Transverse of Mercator. Datum: WGS84. Map Scale 1:38,000. Graphic Scale Units: Miles.

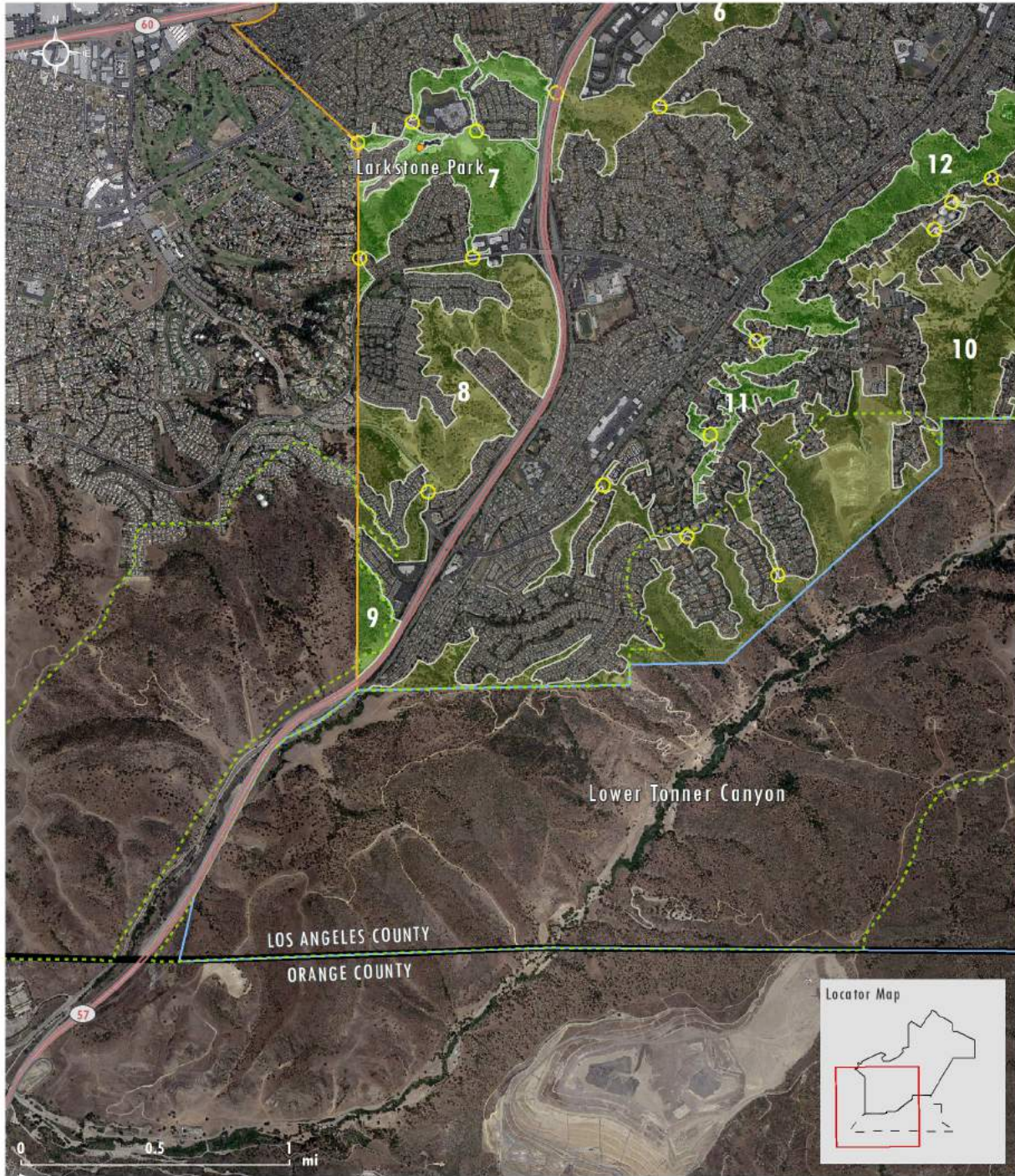


Figure 3c. Natural Open Space Areas

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|---|-------------------------|---|---|
|  | Diamond Bar City Limits |  | Natural Open Space Area |
|  | Sphere of Influence |  | SEA 15 |
|  | Diamond Bar Golf Course |  | Potential Habitat Linkages/Choke Points |
|  | County Line | | |



HAMILTON BIOLOGICAL

World Image Basemap (Clarity) from ESRI, 2017. North American Primary Roads from ESRI, 2018. County Boundary from USGS. Diamond Bar City Limits, Significant Ecological Area (SEA prior OVOV / AV / GP adoption) Digitized from Los Angeles County, 2015. Map Projection: Universal Transverse of Mercator. Datum: WGS84. Map Scale 1:38,000. Graphic Scale Units: Miles.

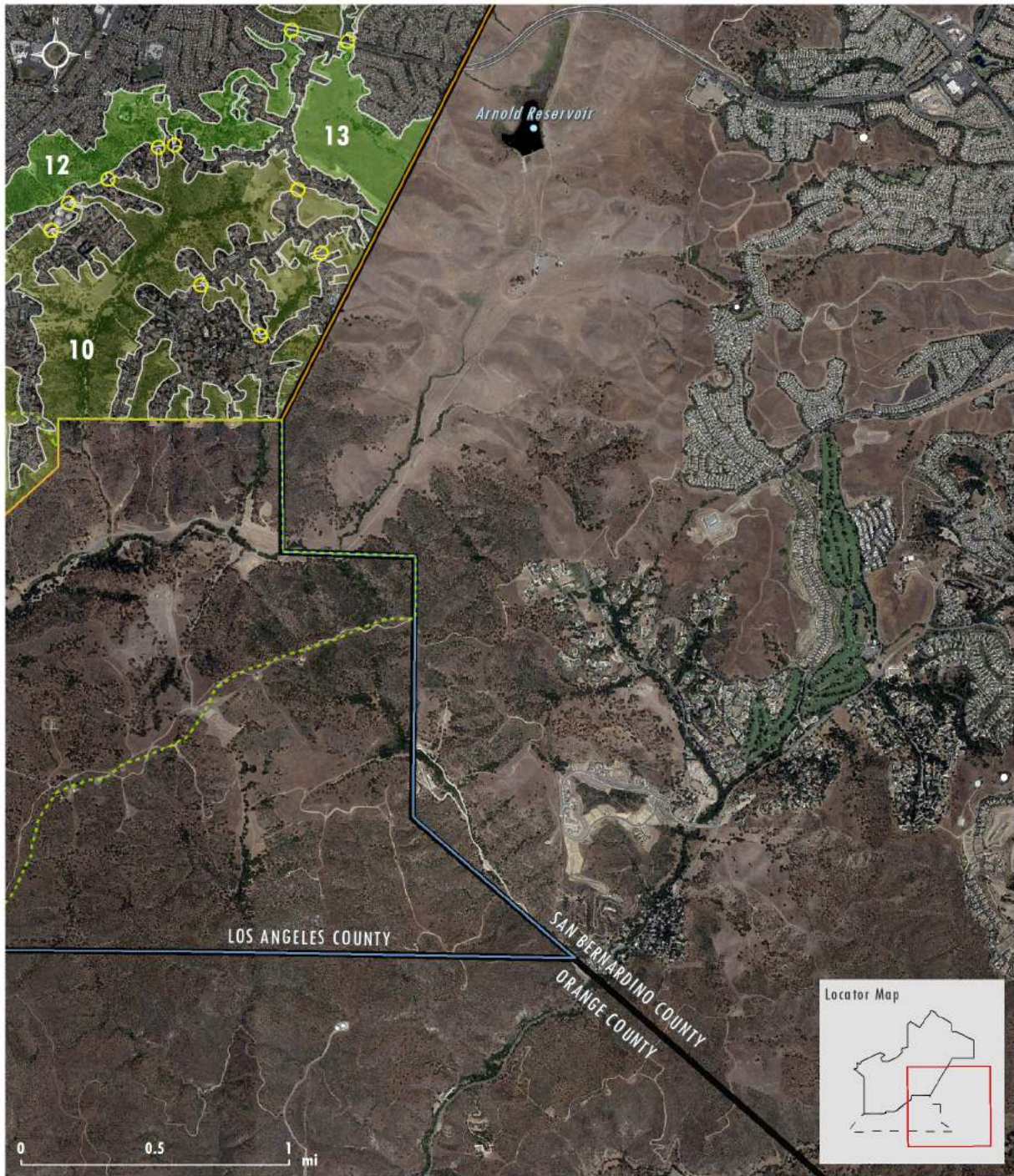


Figure 3d. Natural Open Space Areas

- | | |
|---|---|
|  Diamond Bar City Limits |  Natural Open Space Area |
|  Sphere of Influence |  SEA 15 |
|  Diamond Bar Golf Course |  Potential Habitat Linkages/Choke Points |
|  County Line | |



HAMILTON BIOLOGICAL

World Image Basemap (Clarity) from ESRI, 2017. North American Primary Roads from ESRI, 2018. County Boundary from USGS. Diamond Bar City Limits, Significant Ecological Area (SEA prior OVOV / AV / GP adoption) Digitized from Los Angeles County, 2015. Map Projection: Universal Transverse of Mercator. Datum: WGS84. Map Scale 1:38,000. Graphic Scale Units: Miles.



Resource Protection Recommendations

Resource Protection Recommendations

Table A, below, describes and characterizes the ecological characteristics of each mapped natural open space area at a general level of detail appropriate for a General Plan. Recommendations are made for the establishment of biological protection overlays for sensitive habitat areas with high ecological values (e.g., native woodlands and coastal sage scrub). Note that sensitive natural resources (e.g., special-status species) and/or important ecological functions (e.g., movement of wildlife) could also occur outside of the identified areas. More detailed, project-specific surveys would be required to accurately and adequately describe the ecological resources found in any open space area.

Table A. Resource Protection Recommendations

Area	Acres	Description/Main Communities/ Resource Protection Recommendations
1	926	<p>Largest block of natural open space in Diamond Bar, including Pantera Park and northern part of Tres Hermanos Ranch.</p> <p>Grassland, Coastal Sage Scrub, Cactus Scrub, Chaparral, Oak Woodland, Walnut Woodland, Riparian, Human-altered Habitats.</p> <p>Establish biological protection overlay to conserve (a) large blocks of contiguous natural habitat for Golden Eagles, Mountain Lions, and other species with large foraging areas, (b) native scrub habitats with documented populations of California Gnatcatcher and Cactus Wren, (c) wetland and riparian habitats, and (d) native woodlands; maintain and fortify habitat connections and wildlife movement opportunities; minimize loss, fragmentation, and degradation of Natural Communities.</p>
2	64	<p>Only large block of natural open space in Diamond Bar north of 60 Freeway.</p> <p>Grassland, Coastal Sage Scrub, Chaparral, Coast Live Oak Woodland, Human-altered Habitats.</p> <p>Establish biological protection overlay to conserve native scrub habitats and native woodlands; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.</p>
3	72	<p>“Island” of natural open space between Charmingdale Road and Armitos Place.</p> <p>Coast Live Oak Woodland, Coastal Sage Scrub, Grassland, Human-altered Habitats.</p> <p>Establish biological protection overlay to conserve native scrub habitats and native woodlands; minimize loss, fragmentation, and degradation of Natural Communities.</p>
4	438	<p>Includes Summitridge Park and Steep Canyon/Diamond Bar Creek.</p> <p>Coastal Sage Scrub, Cactus Scrub, Oak Woodland, Riparian, Grassland, Human-altered Habitats.</p> <p>Establish biological protection overlay to conserve native scrub habitats with documented populations of California Gnatcatcher and Cactus Wren, wetland and riparian habitats, and native woodlands; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.</p>

Area	Acres	Description/Main Communities/ Resource Protection Recommendations
5	62	Includes Sycamore Canyon Park/Diamond Bar Creek. Coastal Sage Scrub, Cactus Scrub, Oak Woodland, Riparian, Grassland, Human-altered Habitats. Establish biological protection overlay to conserve native scrub habitats, wetland and riparian habitats, and native woodlands; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.
6	196	Slopes east of City Hall. Oak Woodland, Walnut Woodland, Oak/Walnut Savannah, Chaparral, Grassland, Coastal Sage Scrub, Human-altered Habitats, Riparian. Establish biological protection overlay to conserve native woodlands and savannah; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.
7	154	Includes Larkstone Park. Coast Live Oak Woodland, Oak Savannah, Coastal Sage Scrub, Chaparral, Riparian, Grassland, Human-altered Habitats. Establish biological protection overlay to conserve native woodlands, wetland and riparian habitats, and native scrub habitats; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.
8	231	West of 57 Freeway, south of Pathfinder Road. Oak Woodland, Oak/Walnut Savannah, Coastal Sage Scrub, Chaparral, Grassland, Human-altered Habitats. Establish biological protection overlay to conserve native woodlands and savannah, and native scrub habitats; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.
9	27	Southwestern corner. Oak Woodland, Chaparral, Grassland. Establish biological protection overlay to conserve native woodlands; minimize loss, fragmentation, and degradation of Natural Communities.
10	712	Tonner Canyon tributaries. Chaparral, Oak Woodland, Walnut Woodland, Oak/Walnut Savannah, Coastal Sage Scrub, Riparian, Grassland, Human-altered Habitats. Establish biological protection overlay to conserve native scrub habitats, wetland and riparian habitats, and native woodlands and savannah; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.
11	39	Southwestern section of The Country; part of Significant Ecological Area 15. Oak Woodland, Chaparral, Grassland. Establish biological protection overlay to conserve native woodlands; minimize loss, fragmentation, and degradation of Natural Communities.

Area	Acres	Description/Main Communities/ Resource Protection Recommendations
12	197	Slopes west of Ridge Line Road. Oak Woodland, Walnut Woodland, Chaparral, Grassland, Coastal Sage Scrub, Human-altered Habitats, Riparian. Establish biological protection overlay to conserve native woodlands, wetland and riparian habitats, and native scrub habitats; minimize loss, fragmentation, and degradation of Natural Communities; maintain and fortify habitat connections and wildlife movement opportunities.
13	100	Northeastern part of The Country, adjacent to Tres Hermanos Ranch. Grassland, Coastal Sage Scrub, Chaparral, Oak Woodland, Riparian, Human-altered Habitats. Establish biological protection overlay to conserve (a) large blocks of contiguous natural habitat for Golden Eagles, Mountain Lions, and other species with large foraging areas, (b) wetland and riparian habitats, and (c) native woodlands; maintain and fortify habitat connections and wildlife movement opportunities; minimize loss, fragmentation, and degradation of Natural Communities.
Diamond Bar GC	174	Golf course that provides wildlife habitat. Riparian, Human-altered Habitats (including man-made pond). Conserve wetland and riparian habitats; maintain and fortify habitat connections and wildlife movement opportunities.
Sphere of Influence	3,513	Large and important area of natural open space south of Diamond Bar, including Pantera Park and northern part of Tres Hermanos Ranch; heart of Significant Ecological Area 15. Chaparral, Oak Woodland, Walnut Woodland, Oak/Walnut Savannah, Riparian, Grassland, Coastal Sage Scrub. Establish biological protection overlay to conserve (a) large blocks of contiguous natural habitat for Golden Eagles, Mountain Lions, and other species with large foraging areas, (b) wetland and riparian habitats, (c) native woodlands, and (d) native scrub habitats; minimize loss, fragmentation, and degradation of Natural Communities.

Sensitive Resources

This biological resources report acknowledges federal, state, and local laws and ordinances designed to protect and conserve sensitive resources, and identifies City policies designed to help achieve this objective. For purposes of this report, a sensitive resource refers to any of the following:

- A Natural Community recognized as having special-status by federal, State, and/or local governments, and requiring a permit or agreement prior to its disturbance.
- A plant or animal species identified by federal or state governments as endangered, threatened, rare, protected, sensitive, or a Species of Special Concern.
- A plant or animal that listed by a state or federal agency as a candidate species or proposed for state or federal listing.

SENSITIVE NATURAL COMMUNITIES

The State of California identifies as “Sensitive” the following Natural Communities that occur in Diamond Bar and its Sphere of Influence:

- Native Grasslands.
- Coastal Sage Scrub.
- Coast Live Oak Woodland (*Q. agrifolia/Juglans californica*; *Q. agrifolia/Q. berberidifolia/x acutidens*; *Q. agrifolia/Salvia leucophylla – Artemisia californica*; *Q. agrifolia/Salix lasiolepis*)⁶.
- California Walnut Woodland.
- Riparian Scrub and Woodland.

SPECIAL-STATUS SPECIES

In the following Table B, special-status plants and wildlife judged to have potential to occur within Diamond Bar and its Sphere of Influence are identified and briefly discussed. The potential for occurrence (low, moderate, high, or known to be present) is based upon consideration of the species’ habitat requirements and the distribution of previous verified or highly credible records.

Table B uses the following abbreviations:

- **E** **Endangered** (listed by State or Federal governments). “Take” of the species or disturbance of occupied habitat are prohibited unless specifically authorized.
- **FP** **Fully Protected** by the State of California. These species may not be taken or possessed at any time, although take may be authorized for necessary scientific research.
- **T** **Threatened** (listed by State or Federal governments). “Take” of the species or disturbance of occupied habitat are prohibited unless specifically authorized.
- **SSC** **Species of Special Concern.** The California Department of Fish and Wildlife has designated certain vertebrate species as Species of Special Concern because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction. The goal of designating species as Species of Special Concern is to halt or reverse their decline by

⁶ In addition to the four coast live oak associations designated as “Sensitive” by CDFW, oak woodlands within the unincorporated Sphere of Influence are subject to the Los Angeles County Oak Woodlands Conservation Management Plan pursuant to California Public Resources Code Section 21083 (requires a county, when acting as a CEQA Lead Agency, to determine whether a proposed project “may result in a conversion of oak woodlands that will have a significant effect on the environment”).

calling attention to their plight and addressing the issues of concern early enough to secure their long term viability. Not all Species of Special Concern have declined equally; some species may be just starting to decline, while others may have already reached the point where they meet the criteria for listing as a Threatened or Endangered species under the State and/or Federal Endangered Species Acts.

- **CNPS California Native Plant Society.** Table B includes plant species assigned the following ranks by CNPS:
 - **1B.1**, referring to species CNPS considers to be rare, threatened, or endangered in California and elsewhere; seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat).
 - **1B.2**, referring to species CNPS considers to be rare, threatened, or endangered in California and elsewhere; moderately threatened in California (20-80% of occurrences threatened / moderate degree and immediacy of threat).
 - **1B.3**, referring to species CNPS considers to be rare, threatened, or endangered in California and elsewhere; not very threatened in California (less than 20% of occurrences threatened / moderate degree and immediacy of threat).
 - **2B.2**, referring to species CNPS considers to be rare, threatened, or endangered in California, but more common elsewhere; moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat).
 - **4.1**, referring to species of limited distribution or infrequent throughout a broader area in California, whose status should be monitored regularly; moderately threatened in California (>80% occurrences threatened / moderate degree and immediacy of threat).
 - **4.2**, referring to species of limited distribution or infrequent throughout a broader area in California, whose status should be monitored regularly; moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat).
 - **4.3**, referring to species of limited distribution or infrequent throughout a broader area in California, whose status should be monitored regularly; not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known).

- **NatureServe Element Rankings.** In some cases, species have not been granted special status by state or federal agencies, but they may be recognized as ecologically sensitive by the California Natural Diversity Database (CNDDDB), which uses a ranking methodology maintained by NatureServe. Species are given a Global rank (G-rank) that applies to the taxon's entire distribution, and a State rank (S-rank) that applies to the taxon's state distribution. Taxa with rankings of G1, G2, G3, S1, S2, or S3 may be considered "sensitive" and potentially worthy of special consideration in resource planning. NatureServe Element Rankings are identified in Table B only for taxa that have no other federal or state special status.

NatureServe Ranks:

- **G1, Critically Imperiled**, referring to taxa at very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
- **G2, Imperiled**, referring to taxa at high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
- **G3, Vulnerable**, referring to taxa at moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.
- **S1, Critically Imperiled**, referring to taxa critically imperiled in the state because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.
- **S2, Imperiled**, referring to taxa imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state.
- **S3, Vulnerable**, referring to taxa vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.

Table B. Special-Status Species

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
Plants						
<i>Astragalus brauntonii</i>	Braunton's Milk-Vetch	E	—	1B.1	Associated with calcareous soils. Unrecorded in the Puente Hills, but populations to the northwest (San Gabriel Mts.) and southeast (Chino Hills, Santa Ana Mts.).	Moderate potential to occur in calcareous substrate, if present. Detectable only after fire or other disturbance.
<i>Brodiaea filifolia</i>	Thread-leaved Brodiaea	—	—	1B.1	Associated with clay soils. Unrecorded in the Puente Hills, but populations to the north (San Gabriel Mts.) and southeast (Santiago Hills).	Low potential to occur in vernal pools, grasslands, or openings in coastal sage scrub.
<i>Calochortus catalinae</i>	Catalina Mariposa Lily	—	—	4.2	Widespread in region, occurring in clay soils.	Occurs in grasslands or openings in coastal scrub or chaparral.
<i>Calochortus clavatus</i> var. <i>gracilis</i>	Slender Mariposa Lily	—	—	1B.2	Unrecorded in the Puente Hills; populations to the northwest (San Gabriel Mts.).	Low potential to occur in openings in coastal scrub or chaparral.

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
<i>Calochortus plummerae</i>	Plummer's Mariposa Lily	—	—	4.2	Several recent records of <i>C. weedii intermedius</i> from hills south of Diamond Bar, within the City's Sphere of Influence, may be <i>C. plummerae</i> hybrids.	Potentially present. Occurs in openings in coastal sage scrub or chaparral.
<i>Calochortus weedii</i> var. <i>intermedius</i>	Intermediate Mariposa Lily	—	—	1B.2	Several recent records from hills south of Diamond Bar, within the City's Sphere of Influence, identified as <i>C. weedii intermedius</i> , but with potential for hybridization with <i>C. plummerae</i> .	Occurs in openings in coastal sage scrub and chaparral.
<i>Convolvulus simulans</i>	Small-flowered Morning-glory	—	—	4.2	Scattered records from the region, including an old record from 1 mile east of Brea.	Moderate potential to occur in grasslands or openings in coastal sage scrub. Found in moist areas.
<i>Dudleya multicaulis</i>	Many-stemmed Dudleya	—	—	1B.2	Recorded close to Diamond Bar, in west Pomona.	Moderate potential to occur in openings in coastal sage scrub or chaparral.
<i>Horkelia cuneata</i> ssp. <i>puberula</i>	Mesa Horkelia	—	—	1B.1	Unrecorded in the Puente Hills; scattered records across the region.	Low to moderate potential to occur in sandy openings in chaparral and oak woodland.
<i>Juglans californica</i>	Southern California Black Walnut	—	—	4.2	Widespread in region, including Diamond Bar and its Sphere of Influence.	Walnut and oak/walnut woodlands occur throughout Diamond Bar and surrounding hills.
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's Peppergrass	—	—	4.3	Numerous historical records from the county's interior foothills, including the western Puente Hills; a few recent records in and near Diamond Bar.	Occurs in openings in coastal sage scrub and chaparral.
<i>Microseris douglasii</i> ssp. <i>platycarpha</i>	Small-flowered Microseris	—	—	4.2	Recorded in Diamond Bar, south of Diamond Ranch High School.	Occurs in grasslands.
<i>Phacelia hubbyi</i>	Hubby's Phacelia	—	—	4.2	Several recent records from Pomona, Whittier, and the Santa Ana Mountain foothills.	High potential to occur in openings in chaparral or coastal scrub, such as along edges of roads and trails.

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
<i>Piperia cooperi</i>	Cooper's Rein-Orchid	—	—	4.2	Unrecorded in the Puente Hills; historical records from as close as Claremont and the Santa Ana River Canyon.	Low potential to occur in oak/walnut woodlands, chaparral, or coastal sage scrub.
<i>Polygala cornuta</i> var. <i>fishiae</i>	Fish's Milkwort	—	—	4.3	Recorded in Chino Hills State Park and San Gabriel Mts.	Moderate to high potential to occur in oak/walnut woodlands or chaparral.
<i>Pseudognaphalium leucocephalum</i>	White Rabbit-tobacco	—	—	2B.2	Unrecorded in the Puente Hills; few recent records from surrounding areas.	Low potential to occur in any sandy wash habitat that may exist in the study area.
<i>Quercus engelmannii</i>	Engelmann Oak	—	—	4.2	Recorded in the Chino/Puente Hills, La Habra and Yorba Linda USGS quads.	Moderate potential to occur in oak/walnut woodlands.
<i>Senecio aphanactis</i>	California Groundsel	—	—	2B.2	Historical records from San Dimas; few recent records from surrounding areas.	Moderate potential to occur in chaparral, oak/walnut woodlands, or coastal sage scrub.
<i>Symphyotrichum defoliatum</i>	San Bernardino Aster	—	—	1B.2	Historical records from southeastern Los Angeles County. Presumed extirpated.	Very low potential to occur in moist areas, meadows.
Invertebrates						
<i>Bombas crotchii</i>	Crotch's Bumblebee	—	S1S2	—	Historical and recent records scattered around southern California.	High potential to occur in various habitats.
<i>Helminthoglypta tudiculata</i>	Southern California Shoulder-band Snail	—	S1S2	—	Numerous records from coastal slope of southern California.	High potential to occur in various habitats.
<i>Helminthoglypta traskii traskii</i>	Trask's Shoulder-band Snail	—	G1G2 S1	—	Numerous records from coastal slope of southern California.	High potential to occur in various habitats.
Amphibians						
<i>Taricha torosa</i>	Coast Range Newt	—	SSC	—	Not known from Chino Hills. Nearest records in San Gabriel Mts.	Low potential to occur in and around permanent water.
<i>Spea hammondi</i>	Western Spadefoot	—	SSC	—	Widespread in region but limited to expansive natural open space areas.	Moderate to high potential to occur in extensive grasslands and adjacent communities with temporary rain-pools for breeding.

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
Reptiles						
<i>Emys marmorata</i>	Western Pond Turtle	—	SSC	—	Found in expansive natural areas, in and around permanent water that lacks non-native turtles or exotic predators.	Large population known from Brea Creek; probably occurs elsewhere in the study area. Occurs in creeks and ponds; lays eggs in nearby uplands.
<i>Phrynosoma blainvillii</i>	Coast Horned Lizard	—	SSC	—	Found in expansive natural areas with sandy openings and native harvester ants.	High potential to occur in areas of extensive chaparral, coastal sage scrub, and grassland.
<i>Aspidoscelis tigris stejnegeri</i>	Coastal Whiptail	—	SSC	—	Widespread in the region, in various habitats.	Occurs in chaparral and coastal sage scrub.
<i>Anniella stebbinsi</i>	So. California Legless Lizard	—	SSC	—	Local in a variety of habitats with sandy soil or deep leaf-litter.	Moderate potential in chaparral and chaparral/oak habitats.
<i>Lampropeltis zonata pulchra</i>	San Diego Mountain Kingsnake	—	SSC	—	Widespread in the region, in various habitats.	Moderate potential to occur in chaparral, coastal sage scrub, oak woodlands, and along streams.
<i>Arizona elegans occidentalis</i>	California Glossy Snake	—	SSC	—	Widespread, but uncommon, in habitats with soil loose enough for easy burrowing.	Moderate potential to occur in areas that have extensive patches of loose soil.
<i>Salvadora hexalepis virgulata</i>	Coast Patch-nosed Snake	—	SSC	—	Widespread in the region, in brushy and rocky habitats.	Moderate potential to occur in chaparral, coastal sage scrub, oak woodlands, and along streams.
<i>Thamnophis hammondi</i>	Two-striped Garter Snake	—	SSC	—	Widespread in the region, in and around perennial water.	Moderate potential to occur near perennial water.
<i>Crotalus ruber</i>	Red Diamond Rattlesnake	—	SSC	—	Widespread in the region.	Occurs in cactus scrub, coastal sage scrub, and chaparral.
Birds						
<i>Geococcyx californianus</i>	Greater Roadrunner	—	—	—	Widespread in expansive natural areas with shrub cover. Sensitive species in Los Angeles County (Allen et al. 2009).	Resident in coastal sage scrub and chaparral habitats.

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
<i>Aquila chrysaetos</i>	Golden Eagle	—	FP	—	Formerly widespread in many habitats, but now limited to expansive natural areas. Nests on cliffs and in tall trees away from settlements.	Regularly observed foraging in northeastern part of study area. Pair appears to be resident in the Chino Hills/Diamond Bar area; nesting status unknown. Additional birds may occur during migration/winter.
<i>Circus hudsonius</i>	Northern Harrier	—	SSC	—	Nests on the ground in expansive open space areas; more widespread during migration and winter.	Winters in open grassland habitats. Moderate potential to nest in the northeastern and southern parts of study area.
<i>Elanus leucurus</i>	White-tailed Kite	—	FP	—	Nests in trees within expansive open space areas; more widespread during migration and winter. Forages in rangelands and marshy areas.	One or more observed near Diamond Ranch High School on unspecified date (Sage Environmental Group 2012). High potential to occur in migration and winter, especially in northeastern and southern parts of study area. Moderate potential to nest in the northeastern or southeastern parts of the study area.
<i>Buteo regalis</i>	Ferruginous Hawk	—	—	—	Winters in expansive rangelands and agricultural areas in the region. Sensitive species in Los Angeles County (Allen et al. 2009).	Moderate to high potential to occur in migration and winter, in northeastern and southern parts of study area. Does not nest in the region.
<i>Athene cunicularia</i>	Burrowing Owl	—	SSC	—	Nesting population west of the deserts nearly extirpated. Winters rarely and locally, usually in expansive open space areas.	Likely extirpated as nesting species in Diamond Bar area. Moderate potential to occur in migration and winter, especially in northeastern and southern parts of study area.
<i>Asio otus</i>	Long-eared Owl	—	SSC	—	Resident in oak woodlands, typically >1 km from urban areas. Sensitive species in Los Angeles County (Allen et al. 2009).	Low to moderate potential to occur in woodlands in southeastern part of study area.
<i>Asio flammeus</i>	Short-eared Owl	—	SSC	—	Winters in expansive open areas. Sensitive species in Los Angeles County (Allen et al. 2009).	Low potential to occur in migration and winter, in northeastern and southern parts of study area. Does not nest in the region.

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
<i>Falco mexicanus</i>	Prairie Falcon	—	—	—	Winters in expansive rangelands and agricultural areas in the region. Nests on remote cliffs. Sensitive species in Los Angeles County (Allen et al. 2009).	Low to moderate potential to occur in migration and winter, in northeastern and southern parts of study area. Unlikely to nest due to lack of remote cliffs.
<i>Empidonax traillii</i>	Willow Flycatcher	E	E	—	Does not nest in the local area. Uncommon during migration.	No potential for nesting. Species occurs in the study area regularly during migration periods.
<i>Lanius ludovicianus</i>	Loggerhead Shrike	—	SSC	—	Nests rarely in the region, in expansive open space areas; more widespread in migration and winter. Sensitive species in Los Angeles County (Allen et al. 2009).	High potential to occur in migration and winter, especially in northeastern and southern parts of study area. Low to moderate potential to nest in the study area.
<i>Vireo bellii bellii</i>	Least Bell's Vireo	E	E	—	Nests uncommonly in riparian scrub and woodlands, often in mulefat (<i>Baccharis salicifolia</i>) or willow (<i>Salix</i> spp.).	Moderate potential to nest in riparian habitats, especially in Tonner Canyon.
<i>Eremophila alpestris</i>	Horned Lark	—	—	—	Nests and winters in expansive rangelands and agricultural areas in the region. Sensitive species in Los Angeles County (Allen et al. 2009).	Low potential to occur in the northeastern and southern parts of study area.
<i>Campylorhynchus brunneicapillus</i>	Cactus Wren, coastal populations	—	SSC	—	Rare and declining resident of cactus scrub habitat.	Resident in well-developed cactus scrub, including Summitridge Park, Pantera Park, Steep Canyon, and hills south of Diamond Ranch High School.
<i>Polioptila californica californica</i>	Coastal California Gnatcatcher	T	SSC	—	Uncommon resident in coastal sage scrub habitat, favoring shallow slopes and elevations below 1,500 feet.	Resident in coastal sage scrub and cactus scrub, including Summitridge Park, Pantera Park, Steep Canyon, and hills south of Diamond Ranch High School.
<i>Sialia currucoides</i>	Mountain Bluebird	—	—	—	Winters in expansive open areas. Sensitive species in Los Angeles County (Allen et al. 2009).	High potential to occur, at least during some winters, in northeastern and southern parts of study area. Does not nest in the region.
<i>Icteria virens</i>	Yellow-breasted Chat	—	SSC	—	Nests uncommonly in riparian scrub and woodlands.	High potential to nest in riparian habitats, especially in Tonner Canyon.

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
<i>Setophaga petechia</i>	Yellow Warbler	—	SSC	—	Nests in riparian woodlands.	High potential to nest in riparian habitats, especially in Tonner Canyon.
<i>Poocetes gramineus</i>	Vesper Sparrow	—	—	—	Winters in expansive open areas. Sensitive species in Los Angeles County (Allen et al. 2009).	High potential to occur in northeastern and southern parts of study area. Does not nest in the region.
<i>Ammodramus savannarum</i>	Grasshopper Sparrow	—	SSC	—	Nests in expansive grasslands and rangelands.	High potential to nest in open grassland and rangeland habitat. Several eBird records from the Diamond Bar area in the 1990s; lack of recent records probably reflects lack of survey effort.
<i>Sturnella neglecta</i>	Western Meadowlark	—	—	—	Nests rarely in the region, in expansive open space areas; widespread in migration and winter. Sensitive species in Los Angeles County (Allen et al. 2009).	Occurs in open areas throughout the study area; moderate potential to nest in the northeastern or southern parts of study area.
<i>Agelaius tricolor</i>	Tricolored Blackbird	—	SSC	—	Nests in wetlands adjacent to expansive grasslands and rangelands required for foraging. Winters in rangelands and parks.	Low potential to nest in the study area. Moderate potential to forage in open grassland and rangeland habitat during the nesting season. Recorded in winter at parks in the study area.
Mammals						
<i>Antrozous pallidus</i>	Pallid Bat	None	SSC	—	Widespread in chaparral and similar habitats, foraging on the ground and in vegetation. Roosts in rock crevices and under tree bark. Maternal roosts active between March and August.	High potential; chaparral and scrub on the site are potentially suitable for foraging and oaks provide potential roosting sites under exfoliating bark and in cavities.
<i>Eumops perotis californicus</i>	Western Mastiff Bat	None	SSC	—	Roosts in cliff crevices and in buildings.	Low potential; the species may fly over the site occasionally while foraging, but suitable cliff roosting habitat probably absent.
<i>Lasiurus blossevillii</i>	Western Red Bat	None	SSC	—	Roosts in foliage of many types of tree; feeds over a wide variety of habitats.	Moderate potential to roost in oak woodlands or landscape trees; high potential to forage over undeveloped areas.

Latin name	Common name	Fed.	State	CNPS	Local and/or Regional Status	Discussion
<i>Lasiurus xanthinus</i>	Western Yellow Bat	None	SSC	—	Roosts primarily or entirely in palms; often forages over water.	Moderate potential to roost in palm trees and to forage over water features.
<i>Chaetodipus fallax fallax</i>	NW San Diego Pocket Mouse	None	SSC	—	Scrub habitats with sandy or gravelly soils.	High potential to occur in cactus scrub and coastal sage scrub habitats with suitable soils.
<i>Neotoma lepida intermedia</i>	San Diego Desert Woodrat	None	SSC	—	Widespread in scrub habitats, especially those with cactus.	High potential to occur in cactus-containing scrub.
<i>Lepus californicus bennettii</i>	San Diego Black-tailed Jackrabbit	None	SSC	—	Occurs in various open habitats, usually in expansive open space areas.	Low potential to occur in the northeastern and southern parts of the study area.
<i>Taxidea taxus</i>	American Badger	None	SSC		Occurs in various habitats, usually in expansive open space areas.	Moderate to high potential to occur in the northeastern and southern parts of the study area.

EFFECTS OF DEVELOPMENT ON BIOLOGICAL RESOURCES

The capacity for a given natural open space area to maintain its ecological integrity (e.g., its resistance to invasion by exotic species, capacity to support special-status species) depends upon such considerations as (a) size, with larger natural areas generally possessing greater ecological value than do smaller ones; (b) plant communities represented, with relatively undisturbed native communities generally being more valuable than disturbed non-native communities; and (c) proximity to adjacent open spaces, with areas linked to other natural areas generally possessing greater ecological value compared with areas of similar size that are functionally isolated from other natural areas.

A small, functionally isolated area that provides habitat for a rare plant or wildlife species may have some ecological value, but conservation of such areas may prove to be practically infeasible due to habitat degradation that often occurs near development edges. Ecologically damaging “edge effects” include repeated clearing of habitat for fuel modification leading to replacement of native plants with disturbance-adapted exotic weeds; invasion of natural habitat by exotic ants facilitated by artificial irrigation near homes; predation of birds, reptiles, and mammals by outdoor cats; and changes in wildlife patterns associated with exterior lighting. To avoid perpetuating damaging patterns of development that result in ever-smaller blocks of functionally isolated habitat, the Open Space and Conservation Element must contain land-use policies that encourage the preservation, restoration, and appropriate management of larger blocks of well-connected habitat.

Readers seeking detailed information on these topics, with relevant citations from the scientific literature, should refer to Appendix A.

Edge/Fragmentation Effects on Wildlife Movement

Constricting the movement of wildlife and plant seeds increases the risk of local extinctions. Habitat fragmentation consequently threatens the viability of native plant and wildlife populations in preserved areas. Large areas of habitat, or narrower linkages of habitat between large areas, provide movement opportunities for wildlife. Movement serves to facilitate the geographic distribution of genetic material, thus maintaining a level of variability in the gene pool of an animal population. Influxes of animals from nearby larger populations contribute to the genetic diversity of a local population, helping to ensure the population's ability to adapt to changing environmental conditions. This is mainly accomplished through the dispersal of juveniles from their natal territories, but may also involve movements in response to drought or other adverse environmental conditions, or in response to wildfires or other catastrophic events. Many plant species that depend on relatively sedentary insects for pollination also benefit from habitat linkages that allow for genetic exchange and dispersal. Likewise, plant seeds and propagules can be transported via the feces, fur, or feathers of birds or mammals. Fragmentation effects are not limited to the physical severing of movement routes, such as through the construction of a road or housing development, but can include "edge effects" reviewed and described above. For example, increases in night lighting and noise can disrupt the movement patterns of species not well-adapted to such effects.

WILDLIFE MOVEMENT ISSUES IN THE PUENTE-CHINO HILLS

The Puente-Chino Hills ecosystem encompasses portions of four counties, and the open space network in this area is sometimes referred to as the "Puente-Chino Hills Wildlife Corridor." Preserving land in the corridor has been a cooperative endeavor with other public agencies and many nonprofit organizations. An important analysis by the Conservation Biology Institute (2005), *Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor*, describes the situation as follows (page v):

The Puente-Chino Hills Wildlife Corridor is a peninsula of mostly undeveloped hills jutting about 42 km (26 miles) from the Santa Ana Mountains into the heart of the densely urbanized Los Angeles Basin. Intense public interest in conserving open space here has created a series of reserves and parks along most of the corridor's length, but significant gaps in protection remain. These natural habitat areas support a surprising diversity of native wildlife, from mountain lions and mule deer to walnut groves, roadrunners, and horned lizards. But maintaining this diversity of life requires maintaining functional connections along the entire length of the corridor, so that wildlife can move between reserves—from one end of the hills to the other.

Already the corridor is fragmented by development and crossed by numerous busy roads, which create hazards and in some cases barriers to wildlife movement. Proposed developments threaten to further degrade or even sever the movement corridor, especially within its so-called "Missing Middle." This mid-section of the corridor system, stretching from Tonner Canyon on the east to Harbor Boulevard on the west, includes several large properties proposed for new housing, roads, golf courses, and reservoirs. Such

developments would reduce habitat area and the capacity to support area-dependent species and, if poorly designed, could block wildlife movement through the corridor.

The above-quoted report considered numerous studies of wildlife movement conducted in the Puente-Chino Hills, and other relevant literature on wildlife movement corridors, and recommended “conservation and management actions to prevent further loss of ecological connectivity and retain native species.” The “Missing Middle” analysis identified the following wildlife movement issues specifically relevant to Diamond Bar and its Sphere of Influence:

- Tonner Canyon Bridge represents the only viable location for deer, mountain lions, bobcats, and other species to pass under the 57 Freeway.
- Any development in middle and especially lower Tonner Canyon could have severe impacts on corridor function, especially if wildlife access to Tonner Canyon Bridge is reduced. Any development that blocks access through the bridge area would make the 57 Freeway a complete barrier to many species and would likely lead to wildlife extirpations in segments farther west.
- An earlier plan to build a road running the length of Tonner Canyon would have split the Chino-Tonner “subcore” in two, potentially rendering dysfunctional the critical Tonner Bridge wildlife undercrossing for wide-ranging species such as the mountain lion, bobcat, and mule deer.
- At least the middle and lower portions of Tonner Canyon should be conserved, including a prohibition on any new road or other development that would fragment this critical habitat block.
- No project should be approved that would increase traffic under the Tonner Bridge or add any new impediments (structures, lights, noise, etc.) to the vicinity of the bridge.
- Restore riparian vegetation along Tonner Creek, where degraded by oil development activities.
- Fencing may be warranted along the 57 Freeway if monitoring suggests road mortality is high.

Planning of any future development in Diamond Bar and its Sphere of Influence should take exceptional care to preserve and enhance the viability of the Puente-Chino Hills Wildlife Corridor.

Regional Planning in the Puente-Chino Hills Wildlife Corridor

Two agencies are specifically involved in planning development and taking conservation actions in and around the Puente-Chino Hills Wildlife Corridor.

The **Wildlife Corridor Conservation Authority (WCCA)** was established to provide for the proper planning, conservation, environmental protection, and maintenance of lands

within and around the Puente-Chino Hills Wildlife Corridor. Its goal is to assure that sufficient continuity of habitat can be preserved to maintain a functioning wildlife corridor made up of about 40,000 acres of land located between the Santa Ana Mountains and Whittier Hills. The governing board of the WCCA consists of representatives from the cities of Brea, Whittier, Diamond Bar, La Habra Heights, the Santa Monica Mountains Conservancy, California Department of Parks and Recreation, California Department of Fish and Game (*ex officio* member), Los Angeles County, and two public members. A large Advisory Committee meets separately to provide input. The WCCA consistently provides comments on development proposals and other projects to support environmentally sensitive activities in the Puente-Chino Hills Wildlife Corridor.

The **Puente Hills Habitat Preservation Authority (PHHPA)** is a public agency, Joint Powers Authority, with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. The jurisdiction of the PHHPA extends from the intersection of the 605 and 60 Freeways east to Harbor Boulevard. The PHHPA is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity.

NATURAL RESOURCE CONSERVATION POLICIES

The City of Diamond Bar has developed a suite of conservation measures, presented in this section, designed to allow for the planned growth of the City while protecting and conserving irreplaceable natural communities and their component species. These policies align the local approach to development with the conservation regulations and policies set forth by the federal government (e.g., the federal Endangered Species Act); the State of California (e.g., the California Environmental Quality Act and the California Fish and Game Code); and local entities (e.g., the Los Angeles County Oak Woodlands Conservation Plan; see Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance 2011, Los Angeles County Dept. of Regional Planning 2014). Prioritizing the identification and protection of sensitive natural resources facilitates efforts of City planners and elected officials to ensure that Diamond Bar remains a beautiful and desirable place to live.

Goals and Policies of the Open Space and Conservation Element

- **RC-I-1.** Obtain and designate Open Space land through acquisition techniques, such as:
 - a. Design new development projects emphasizing preservation of sensitive natural resources, natural geological features, and wildlife corridors and habitat linkages, through site design approaches that include greenbelts, landscaping with locally native, drought-adapted plants, and dedication of a portion of the site as natural open space.

- b. Allow for acquisition of open space lands during the entitlement process through the transfer of densities among land uses of like designation.
 - c. Identify ecologically sensitive/unique habitats, including habitat linkages and choke-points, within the City of Diamond Bar and prioritize their acquisition/preservation/restoration as a preferred form of mitigation for future development.
 - d. Collaborate with land trusts, joint-power authorities, and other conservation groups to acquire and restore open space land through, but not limited to, conservation easements and conservation plans.
- **RC-I-2.** As future parks are developed or open space is acquired/dedicated:
 - a. Preserve sensitive natural communities to maintain ecological integrity and provide for passive recreation opportunities, such as hiking and bird-watching.
 - b. Site trails to avoid removal or fragmentation of sensitive natural communities and to minimize erosion.
 - c. Prohibit the application of use of outdoor pesticide bait stations, or similar, within 500 feet of any natural open space.
- **RC-G-4.** Provide recreational and cultural opportunities to the public in a manner that maintains, restores, protects, and preserves sensitive natural resources in the City of Diamond Bar and its Sphere of Influence.
- **RC-I-12.** Support and cooperate with efforts to identify and preserve environmentally sensitive and strategically located canyon areas and hillsides that serve as wildlife corridors and habitat linkages/choke points within Diamond Bar and its Sphere of Influence, including components of the Puente-Chino Hills Wildlife Corridor, Tres Hermanos Ranch, Tonner Canyon, and Significant Ecological Area (SEA) 15, to provide regional connectivity, and to sustain the ecological function of natural habitats and biological resources.
 - a. Establish appropriate resource protection overlays for ecologically sensitive areas (see page 18 of this report).
 - b. Require adequate biological resources surveys as part of planning of development proposed in any area with potential for special-status species or sensitive natural communities to occur.
 - c. Discourage development in areas with identified sensitive natural resources, natural geological features, and wildlife corridors and habitat linkages/choke points, in order to preserve them in a natural state, unaltered by grading, fill, or diversion activities (except as may be desirable for purposes of habitat restoration and/or facilitation of wildlife movement).

- d. Preserve and restore native woodlands in perpetuity, with a goal of no net loss of existing woodlands, through compliance with Chapter 22.38 of the Diamond Bar – Tree Preservation and Protection.
 - e. In the unincorporated Sphere of Influence, require that impacts to native oak trees be treated in a manner consistent with Section 22.46.2100 of the County of Los Angeles Code of Ordinances, except that in-lieu fees shall not be accepted as mitigation for removal of regulated oaks. If replacement of oaks is determined to be necessary, this should be conducted under a City-administered Tree Mitigation Program developed in consultation with a qualified biologist and Certified Arborist or Certified Urban Forester to establish a to ensure that replacement trees are planted on public property in areas that (a) shall not impact any existing sensitive habitat areas; (b) are appropriate for the long-term survival of native trees planted as mitigation; and (c) shall be maintained and preserved by the city, in perpetuity, as natural open space for the mitigation trees and any associated understory species deemed appropriate to provide valuable woodland habitat.
 - f. For development proposed adjacent to natural open space, require use of highly fire-resistant building materials and methods, which minimize fuel modification treatments.
 - g. In areas adjacent to natural open space, require use of highly fire-resistant building materials and architecture for public safety and to minimize requirements for damaging fuel modification treatments.
 - h. Fuel modification adjacent to natural open spaces should employ exclusively native plant species approved for use in fuel modification zones, which provide important habitat for native wildlife and minimize ongoing irrigation and disturbance of the exterior slopes, reducing the potential for exotic ants and weeds to become established on the site and then spread to nearby natural open space areas.
- **RC-I-28.5.** Conserve natural open spaces, biological resources, and vegetation, recognizing their roles in the reduction and mitigation of air pollution impacts, and the promotion of carbon sequestration.

LITERATURE CITED

- Allen, L. W., and Los Angeles County Sensitive Bird Species Working Group. 2009. Los Angeles County's Sensitive Bird Species. *Western Tanager* 75(3):E1–E11.
- City of Diamond Bar and Diamond Bar Historical Society. 2014. *Images of America, Diamond Bar*. Arcadia Publishing, Charleston, South Carolina.
- Conservation Biology Institute. 2005. *Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor*. Encinitas, CA.
<https://d2k78bk4kdhbpr.cloudfront.net/media/reports/files/pmissingmiddle.pdf>

- Dyett & Bhatia. 2017. City of Diamond Bar General Plan Update, Existing Conditions Report – Volume III. Redline draft dated February 21, 2017, prepared for City of Diamond Bar.
- Los Angeles County, Dept. of Regional Planning. 2014. Los Angeles County Oak Woodlands Conservation Management Plan Guide. Report dated March 18, 2014.
http://planning.lacounty.gov/assets/upl/project/oakwoodlands_conservation-management-plan-guide.pdf
- Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. 2011. Los Angeles County Oak Woodlands Conservation Management Plan. Report dated May 2011.
http://file.lacounty.gov/SDSInter/bos/bc/162273_official_20110620_oak-woodlands.pdf
- Lower San Gabriel River Watershed Group. 2015. Lower San Gabriel River Watershed Management Program.
<https://www.waterboards.ca.gov/rwqcb4/waterissues/programs/stormwater/municipal/watershedmanagement/sangabriel/lowersangabriel/LowerSGRiverFinalWMP.pdf>
- Neal, S. 2011. Brea History – the Brea Creek. Brea Historical Society Brea Museum & Heritage Center.
- Sage Environmental Group. 2012. Affordable Housing Land Use and Zoning Designation Project, Biological Survey Report. Report dated August 2012 prepared for City of Diamond Bar.
- Sheng, J. and J. P. Wilson. 2008. The Green Visions Plan for 21st Century Southern California. 16. Watershed Assets Assessment Report. University of Southern California GIS Research Laboratory and Center for Sustainable Cities, Los Angeles, CA.
- U.S. Army Corps of Engineers. 1991. Los Angeles County Drainage Area Review, Final Feasibility Study, Interim Report and Environmental Impact Statement. Vandergast, A. G., A. J. Bohonak, D. B. Weissman, and R. N. Fisher. 2006. Understanding the genetic effects of recent habitat fragmentation in the context of evolutionary history: Phylogeography and landscape genetics of a southern California endemic Jerusalem cricket (Orthoptera: Stenopelmatidae: *Stenopelmatus*). *Molecular Ecology* 16:977–92.



HAMILTON BIOLOGICAL

February 20, 2019



**SUBJECT: APPENDIX A TO OPEN SPACE AND CONSERVATION ELEMENT
DIAMOND BAR GENERAL PLAN UPDATE
METHODS AND TECHNICAL INFORMATION**

Dear Mr. Gubman,

A consortium of Diamond Bar residents retained Hamilton Biological, Inc., (hereafter “Hamilton Biological”) to prepare an Open Space and Conservation Element for the City of Diamond Bar (hereafter the “City”) to consider incorporating into a forthcoming update to its General Plan. This letter describes the methods used to prepare the proposed Open Space and Conservation Element, and provides technical biological information that underpins the report’s findings and recommendations.

METHODS

Literature Review

As an initial step, Robert Hamilton, President of Hamilton Biological, reviewed the Biological Resources section of Dyett & Bhatia (2017) and a partial rough draft of an Open Space and Conservation Element prepared by Cooper Ecological Monitoring, Inc. Mr. Hamilton also reviewed a biological report prepared by Sage Environmental Group (2012) for an Affordable Housing Land Use and Zoning Designation Project proposed on a site covering 78 acres in the northeastern part of the City, near Diamond Ranch High School.

Special-status species with potential to occur in Diamond Bar and adjacent areas were identified through review of the California Natural Diversity Database (2018a, 2018b, 2018c) and searches of eBird (<https://ebird.org>); California Native Plant Society’s Online Inventory of Rare and Endangered Plants (www.rareplants.cnps.org); review of the list of Los Angeles County’s Sensitive Bird Species (Allen et al. 2009; https://losangelesaudubon.org/images/stories/pdf/WesternTanager_pdfs/Vol.75/vol75no03jan-feb2009.pdf); the Consortium of California Herbaria web page (www.ucjeps.berkeley.edu/consortium); Sage Environmental Group (2012); Dyett &

Bhatia (2017); and the online *Flora of the Skyline Trail, Puente Hills, Los Angeles County* (Muns, B., 1982; http://tchester.org/plants/muns/pr/skyline_trail.html).

Mapping and Field Surveys

Robert A. Hamilton mapped the natural open space areas throughout the City and its Sphere of Influence using Google Earth Pro. Potential habitat linkages and/or choke-points for wildlife movement were identified by examination of aerial imagery. Mr. Hamilton conducted reconnaissance field surveys on January 4 and 8, and February 4 and 8, 2019, to field-check the mapping and to observe the existing conditions throughout most of Diamond Bar. Mr. Hamilton has visited the portion of Tonner Canyon that lies within the City's Sphere of Influence on numerous occasions in recent years, and thus has viewed the natural resources found in that part of the study area, as well.

Classification of Natural Communities

Since the mid-1990s, CDFW and its partners, including the California Native Plant Society (CNPS), have been working on classifying vegetation types using standards embodied in the Survey of California Vegetation, which comply with the National Vegetation Classification Standard (NVCS; <http://usnvc.org/explore-classification/>). The NVCS is a hierarchical classification, with the most granular level being the Association. Associations are grouped into Alliances, Alliances into Groups, and upward, as follows: Formation Class > Formation Subclass > Formation > Division > Macrogroup > Group > Alliance > Association. For purposes of this Open Space and Conservation Element, Natural Communities are generally classified at the more generalized levels (e.g., Group), but for environmental review of specific projects in Diamond Bar, Natural Communities should be classified and mapped at the more detailed Alliance or Association level.

The method recommended by CDFW for classifying Natural Communities and conducting CEQA review reads as follows:

- Identify all Natural Communities within the project footprint using the best means possible, for example, keying them out in the Manual of California Vegetation, Second Edition (Sawyer et al. 2009) or in classification or mapping reports from the region, available on VegCAMP's Reports and Maps page.
- Refer to the current standard list of Natural Communities to determine if any of these types are ranked Sensitive (S1-S3 rank); if so, see CEQA Guidelines checklist at IVb.
- Other considerations when assessing potential impacts to Sensitive Natural Communities from a project include:
 1. Compliance with state and federal wetland and riparian policies and codes, as certain Natural Communities are restricted to wetlands or riparian settings.

2. Compliance with the Native Plant Protection Act and the state and federal Endangered Species Acts, as some Natural Communities either support rare species or are defined by the dominance or presence of such species.
 3. Compliance with CEQA Guidelines Section 15065(a), which mandates completion of an EIR if a project would threaten to eliminate a plant community.
 4. Compliance with local regional plans, regulations, or ordinances that call for consideration of impacts to Natural Communities.
 5. Vegetation types that are not on the state's sensitive list but that may be considered rare or unique to the region under CEQA Guidelines Section 15125(c).
- If a Natural Community in the project area has not previously been described, it may be a rare type. In this case, please contact VegCAMP (Todd Keeler-Wolf or Diana Hickson) about documenting the Natural Community.
 - If there are Sensitive Natural Communities on your project site and you need guidance, contact the appropriate regional staff person through the local CDFW Regional Office to discuss potential project impacts; these staff have local knowledge and context.

Identifying Sensitive Natural Communities

The California Department of Fish and Wildlife (CDFW), at its VegCAMP page, provides guidance on appropriate methods for "Addressing Sensitive Natural Communities in Environmental Review":

<https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>

The State's guidance consists of the following steps:

- Identify all Natural Communities within the project footprint using the best means possible, for example, keying them out in the Manual of California, Second Edition (Sawyer et al. 2009) or in classification or mapping reports from the region, available on VegCAMP's Reports and Maps page.
- Refer to the current standard list of Natural Communities to determine if any of these types are ranked Sensitive (S1-S3 rank); if so, see CEQA Guidelines checklist at IVb.
- Other considerations when assessing potential impacts to Sensitive Natural Communities from a project include:
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 - If a Natural Community in the project area has not previously been described, it may be a rare type. In this case, please contact VegCAMP (Todd Keeler-Wolf or Diana Hickson) about documenting the Natural Community.
 - If there are Sensitive Natural Communities on your project site and you need guidance, contact the appropriate regional staff person through the local CDFW Regional Office to discuss potential project impacts; these staff have local knowledge and context.
 - The Department’s document, [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities](#) (PDF) provides information on reporting.

The City of Diamond Bar should employ the above-described methods to ensure the thoroughness and adequacy of CEQA documentation completed within the City and its Sphere of Influence.

Important Considerations for Oak Woodlands

As of January 2005, California Public Resources Code Section 21083.4 (2004 Senate Bill 1334) requires that when a county is determining the applicability of CEQA to a project, it must determine whether that project “may result in a conversion of oak woodlands that will have a significant effect on the environment.” If such effects (either individual impacts or cumulative) are identified, the law requires that they be mitigated. Acceptable mitigation measures include, but are not limited to, conservation of other oak woodlands through the use of conservation easements and planting replacement trees, which must be maintained for seven years.

Diamond Bar’s Sphere of Influence, south of the city limits, lies within unincorporated Los Angeles County, and thus the City’s General Plan should acknowledge that the County of Los Angeles Department of Regional Planning issued in 2014 an Oak Woodlands Conservation Management Plan Guide¹, with three important objectives: (1) pri-

¹ http://planning.lacounty.gov/assets/upl/project/oakwoodlands_conservation-management-plan-guide.pdf

oritize the preservation of oak woodlands; (2) promote conservation by integrating oak woodlands into the development process in a sustainable manner; and (3) effectively mitigate the loss of oak woodlands.

ADVERSE EFFECTS OF DEVELOPMENT ON PRESERVED HABITAT AREAS

One purpose of a General Plan is to guide future development so as to minimize adverse effects upon sensitive Natural Communities and declining native plant and wild-life populations, to the extent feasible. Beyond the outright removal of natural areas, which obviously impacts natural resources, development projects inevitably degrade and fragment habitats along the urban/wildland interface. Such secondary, or indirect, impacts have been subject to intensive study in recent years, to (a) understand and characterize them, and (b) develop strategies for minimizing and mitigating them. The following discussions, including citations from the scientific literature, provide the basis for the General Plan's land-use policies concerning edge and fragmentation effects.

Urbanization typically includes residential, commercial, industrial, and road-related development. At the perimeter of the built environment is an area known as the urban/wildland interface, or "development edge." Edges are places where natural communities interface, vegetation or ecological conditions within natural communities interact (Noss 1983), or patches with differing qualities abut one another (Ries and Sisk 2004). "Edge effects" are spillover effects from the adjacent human-modified matrix that cause physical gradients in light, moisture, noise, etc. (Camargo and Kapos 1995; Murcia 1995, Sisk et al. 1997) and/or changes in biotic factors such as predator communities, density of human-adapted species, and food availability (Soulé et al. 1988; Matlack 1994; Murcia 1995; Ries and Sisk 2004). Loss, degradation, and fragmentation of habitat due to urbanization are the most pervasive threats to biodiversity in southern California (Soulé 1991). Edge-related impacts may include:

- Introduction/expansion of invasive exotic vegetation carried in from vehicles, people, animals or spread from backyards or fuel modification zones adjacent to wildlands.
- Increased frequency and/or severity of fire as compared to natural fire cycles or intensities.
- Companion animals (pets) that often act as predators of, and/or competitors with, native wildlife.
- Creation and use of trails that often significantly degrade intact ecosystems through such changes as increases in soil disturbance, vegetation damage, and noise.
- Introduction of or increased use by exotic animals which compete with or prey on native animals.
- Pesticide exposure can be linked to cancer, endocrine disruption, reproductive effects, neurotoxicity, kidney and liver damage, birth defects, and developmental changes in a wide range of species, from insects to top predators.

- Influence on earth systems and ecosystem processes, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution that can affect the natural environment.

Any of these impacts, individually or in combination, can result in the effective loss or degradation of habitats used for foraging, breeding or resting, with concomitant effects on population demographic rates of sensitive species.

The coastal slope of southern California is among the most highly fragmented and urbanized regions in North America (Atwood 1993). Urbanization has already claimed more than 90 percent of the region's coastal sage scrub habitat, 99 percent of the coastal prairie, and 95 percent of the vernal pools (McCauill 1994; Mattoni & Longcore 1997; Bauder & McMillan 1998). A review of studies completed by Harrison and Bruna (1999) identified a general pattern of reduction of biological diversity in fragmented habitats compared with more intact ones, particularly with regard to habitat specialists. While physical effects associated with edges were predominant among species impacts, they found evidence for indirect effects including altered ecological interactions. Fletcher et al. (2007) found that distance from edge had a stronger effect on species than did habitat patch size, but they acknowledged the difficulty in separating those effects empirically. Many southern California plant and animal species are known to be sensitive to fragmentation and edge effects; that is, their abundance declines with fragment size and proximity to an edge (Wilcove 1985; Soulé et al. 1992; Bolger et al. 1997a,b; Suarez et al. 1998; Burke and Nol 2000).

Wildlife populations are typically changed in proximity to edges, either by changes in their demographic rates (survival and fecundity), or through behavioral avoidance of or attraction to the edge (Sisk et al. 1997; Ries and Sisk 2004). For example, coastal sage scrub areas within 250 meters of urban edges consistently contain significantly less bare ground and more coarse vegetative litter than do more "intermediate" or "interior" areas, presumably due increased human activity/disturbance of the vegetation structure near edges (Kristan et al. 2003). Increases in vegetative litter often facilitate growth of non-native plants (particularly grasses), resulting in a positive feedback loop likely to enhance plant invasion success (Wolkovich et al. 2009). In another coastal southern California example, the abundance of native bird species sensitive to disturbance is typically depressed within 200 to 500 meters (650 to 1640 feet) of an urban edge, and the abundance of disturbance-tolerant species is elevated up to 1000 meters (3280 feet) from an urban edge, depending on the species (Bolger et al. 1997a).

Habitat fragmentation is usually defined as a landscape scale process involving habitat loss and breaking apart of habitats (Fahrig 2003). Habitat fragmentation is among the most important of all threats to global biodiversity; edge effects (particularly the diverse physical and biotic alterations associated with the artificial boundaries of fragments) are dominant drivers of change in many fragmented landscapes (Laurance and Bierregaard 1997; Laurance et al. 2007).

Fragmentation decreases the connectivity of the landscape while increasing both edge and remnant habitats. Urban and agricultural development often fragments wildland ecosystems and creates sharp edges between the natural and human-altered habitats. Edge effects for many species indirectly reduce available habitat use or utility in surrounding remaining areas; these species experience fine-scale functional habitat losses (e.g., see Bolger et al. 2000; Kristan et al. 2003; Drolet et al. 2016). Losses of coastal sage scrub in southern California have increased isolation of the remaining habitat fragments (O'Leary 1990) and led to calls to preserve and restore landscape connectivity to permit long-term persistence of native species with low vagility (e.g., Vandergast et al. 2006).

Fragmentation has a greater relative negative impact on specialist species (e.g., coastal populations of the Cactus Wren, *Campylorhynchus brunneicapillus*) that have strict vegetation structure and area habitat requirements (Soulé et al. 1992). Specialist species have an increased risk of extirpation in isolated habitat remnants because the specialized vegetative structures and/or interspecific relationships on which they depend are more vulnerable to disruption in these areas (Vaughan 2010). In studies of the coastal sage scrub and chaparral systems of coastal southern California, fragment area and age (time since isolation) were the most important landscape predictors of the distribution and abundance of native plants (Soulé et al. 1993), scrub-breeding birds (Soulé et al. 1988; Crooks et al. 2001), native rodents (Bolger et al. 1997b), and invertebrates (Suarez et al. 1998; Bolger et al. 2000).

Edge effects that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe and Ginsberg 1998). In studies of coastal sage scrub urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of native and exotic carnivore distribution and abundance (Crooks 2002). These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge (Crooks 2002).

The increased presence of human-tolerant “mesopredators” in southern California represents an edge effect of development; they occur within the developed matrix and are thus more abundant along the edges of habitat fragments, and they are effective predators on birds, bird nests, and other vertebrates in coastal sage scrub and chaparral systems and elsewhere (Crooks and Soulé 1999). The mammalian carnivores more typically detected in coastal southern California habitat fragments are resource generalists that likely benefit from the supplemental food resources (e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the overall mesopredator abundance, of such species as raccoons (*Procyon lotor*), opossums (*Didelphis virginiana*), and domestic cats (*Felis catus*), increases at sites with more exotic plant cover and closer to the urban edge (Crooks 2002). Although some carnivores within coastal sage scrub fragments seem tolerant of disturbance, many fragments have (either actually or effectively) already lost an entire suite of predator species, including mountain lion, bobcats (*Lynx rufus*), spotted skunks (*Spilogale gracilis*), long-tailed weasels (*Mustela frenata*), and badgers (*Taxidea taxus*) (Crooks 2002). Most

“interior” sites within such fragments are still relatively near (within 250 meters of) urban edges (Crooks 2002).

Fragmentation generally increases the amount of edge per unit land area, and species that are adversely affected by edges can experience reduced effective area of suitable habitat (Temple and Cary 1988), which can lead to increased probability of extirpation/extinction in fragmented landscapes (Woodroffe and Ginsberg 1998). For example, diversity of native bees (Hung et al. 2015) and native rodents (Bolger et al. 1997b) is lower, and decomposition and nutrient cycling are significantly reduced (Treseder and McGuire 2009), within fragmented coastal sage scrub ecosystems as compared to larger core reserves. Similarly, habitat fragmentation and alterations of sage scrub habitats likely have reduced both the genetic connectivity and diversity of coastal-slope populations of the Cactus Wren in southern California (Barr et al. 2015). Both Bell’s Sparrows (*Artemisiospiza belli*) and California Thrashers (*Toxostoma redivivum*) show strong evidence of direct, negative behavioral responses to edges in coastal sage scrub; that is, they are edge-averse (Kristan et al. 2003), and California Thrashers and California Quail (*Callipepla californica*) were found to be more vulnerable to extirpation with smaller fragment size of the habitat patch (Bolger et al. 1991), demonstrating that both behavioral and demographic parameters can be involved. Other species in coastal sage scrub ecosystems, particularly the Cactus Wren and likely the California Gnatcatcher and San Diego Pocket Mouse (*Chaetodipus fallax*), are likely vulnerable to fragmentation, but for these species the mechanism is likely to be associated only with extirpation vulnerability from habitat degradation and isolation rather than aversion to the habitat edge (Kristan et al. 2003). Bolger (et al. 1997b) found that San Diego coastal sage scrub and chaparral canyon fragments under 60 acres that had been isolated for at least 30 years support very few populations of native rodents, and they suggested that fragments larger than 200 acres in size are needed to sustain native rodent species populations.

The penetration of exotic species into natural areas can reduce the effective size of a reserve in proportion to the distance they penetrate within the reserve: Argentine Ants serve as an in-depth example of edge effects and fragmentation. Spatial patterns of Argentine Ant abundance in scrub communities of southern California indicate that they are likely invading native habitats from adjacent developed areas, as most areas sampled greater than 200 to 250 meters from an urban edge contained relatively few or no Argentine Ants (Bolger 2007, Mitrovich et al. 2010). The extent of Argentine Ant invasions in natural environments is determined in part by inputs of urban and agricultural water run off (Holway and Suarez 2006). Native ant species were more abundant away from edges and in areas with predominately native vegetation. Post-fragmentation edge effects likely reduce the ability of fragments to retain native ant species; fragments had fewer native ant species than similar-sized plots within large unfragmented areas, and fragments with Argentine ant-free refugia had more native ant species than those without refugia (Suarez et al. 1998). They displace nearly all surface-foraging native ant species (Holway and Suarez 2006) and strongly affect all native ant communities within about 150 to 200 meters from fragment edges (Suarez et al. 1998; Holway 2005; Fisher et al. 2002; Bolger 2007; Mitrovich et al. 2010). Argentine Ants are widespread in frag-

mented coastal scrub habitats in southern California, and much of the remaining potential habitat for Blainville's Horned Lizards (*Phrynosoma blainvillii*) is effectively unsuitable due to the penetration of Argentine ants and the subsequent displacement of the native ant species that Coastal Horned Lizards need as prey (Fisher et al. 2002). Invasion of Argentine Ants into coastal sage scrub has also shown a strong negative effect on the abundance of the gray shrew (*Notiosorex crawfordi*) (Laakkonen et al. 2001).

An evaluation by the U.S. Environmental Protection Agency (2008) concluded that each of ten of the most common active ingredients in rodenticides "poses significant risks to non-target wildlife when applied as grain-based bait products. The risks to wildlife are from primary exposure (direct consumption of rodenticide bait) for all compounds and secondary exposure (consumption of prey by predators or scavengers with rodenticide stored in body tissues) from the anticoagulants." Thus, the common practice of setting out bait within or near natural areas can be expected to have adverse effects upon a range of native wildlife species.

Finally, in the Santa Monica Mountains of Los Angeles County, populations of such native amphibians as the California newt (*Taricha torosa*) and California treefrog (*Pseudacris cadaverina*) were found to decline with urbanization of as little as 8% of a given watershed (Riley et al. 2005). Such faunal community changes appear to be related to changes in physical stream habitat, such as fewer pool and more run habitats and increased water depth and flow. These changes are associated with increased erosion and with invasion by damaging exotic species, such as the red swamp crayfish (*Procambarus clarkii*).

CONCLUSION

I appreciate the opportunity to provide this technical information in support of the Open Space and Conservation Element for the Diamond Bar General Plan. If you have questions, please call me at [REDACTED]

Sincerely,



Robert A. Hamilton
President, Hamilton Biological, Inc.



Attached: Literature Cited

LITERATURE CITED

- Allen, L. W., and Los Angeles County Sensitive Bird Species Working Group. 2009. Los Angeles County's Sensitive Bird Species. *Western Tanager* 75(3):E1–E11.
- Barr, K. R., B. E. Kus, K. L. Preston, S. Howell, E. Perkins, and A. G. Vandergast. 2015. Habitat fragmentation in coastal southern California disrupts genetic connectivity in the Cactus Wren (*Campylorhynchus brunneicapillus*). *Molecular Ecology* 24:2349–2363.
- Bauder, E. T., and S. McMillan. 1998. Current distribution and historical extent of vernal pools in southern California and northern Baja California, Mexico. Pp. 56–70 in *Ecology, Conservation and Management of Vernal Pool Ecosystems* (C. W. Witham, E. T. Bauder, D. Belk, W. R. Ferren Jr., and R. Ornduffm, editors). California Native Plant Society, Sacramento.
- Bolger, D. T. 2007. Spatial and temporal variation in the Argentine ant edge effect: implications for the mechanism of edge limitation. *Biological Conservation* 136:295–305.
- Bolger, D. T., A. C. Alberts, and M. E. Soulé. 1991. Occurrence patterns of bird species in habitat fragments: sampling, extinction, and nested species subsets. *The American Naturalist* 137(2):155–166.
- Bolger, D. T., T. A. Scott, and J. T. Rotenberry. 1997a. Breeding bird abundance in an urbanizing landscape in coastal southern California. *Conservation Biology* 11(2):406–421.
- Bolger, D. T., A. C. Alberts, R. M. Sauvajot, P. Potenza, C. McCalvin, D. Tran, S. Mazzoni, and M. E. Soulé. 1997b. Response of rodents to habitat fragmentation in coastal southern California. *Ecological Applications* 7(2):552–563.
- Bolger, D. T., A. V. Suarez, K. R. Crooks, S. A. Morrison, and T. J. Case. 2000. Arthropods in urban habitat fragments in southern California: area, age, and edge effects. *Ecological Applications* 10(4):1230–1248.
- Burke, D. M., and E. Nol. 2000. Landscape and fragment size effects on reproductive success of forest-breeding birds in Ontario. *Ecological Applications* 10(6):1749–1761.
- California Natural Diversity Database. 2018a. Special Vascular Plants, Bryophytes, and Lichens List. Current list of vegetative taxa considered to be rare, threatened, endangered, or otherwise “sensitive” by the State of California. List dated November 2018.
- California Natural Diversity Database. 2018b. Special Animals List. Current list of wildlife taxa considered to be rare, threatened, endangered, or otherwise “sensitive” by the State of California. List dated November 2018.
- California Natural Diversity Data Base. 2018c. Rarefind data accessed online on July 6, 2018, for the U.S. Geologic Survey's Yorba Linda, San Dimas, Ontario, and Prado Dam 7.5' topographic quadrangles.
- Camargo, J. L. C., and V. Kapos. 1995. Complex edge effects on soil moisture and microclimate in central Amazonian forest. *Journal of Tropical Ecology* 11(2):205–221.
- Conservation Biology Institute. 2005. Maintaining Ecological Connectivity Across the “Missing Middle” of the Puente-Chino Hills Wildlife Corridor. Encinitas, CA.
https://d2k78bk4kdhbpr.cloudfront.net/media/reports/files/pc_missing_middle.pdf
- Crooks, K. R. 2002. Relative sensitivities of mammalian carnivores to habitat fragmentation. *Conservation Biology* 16(2):488–502.

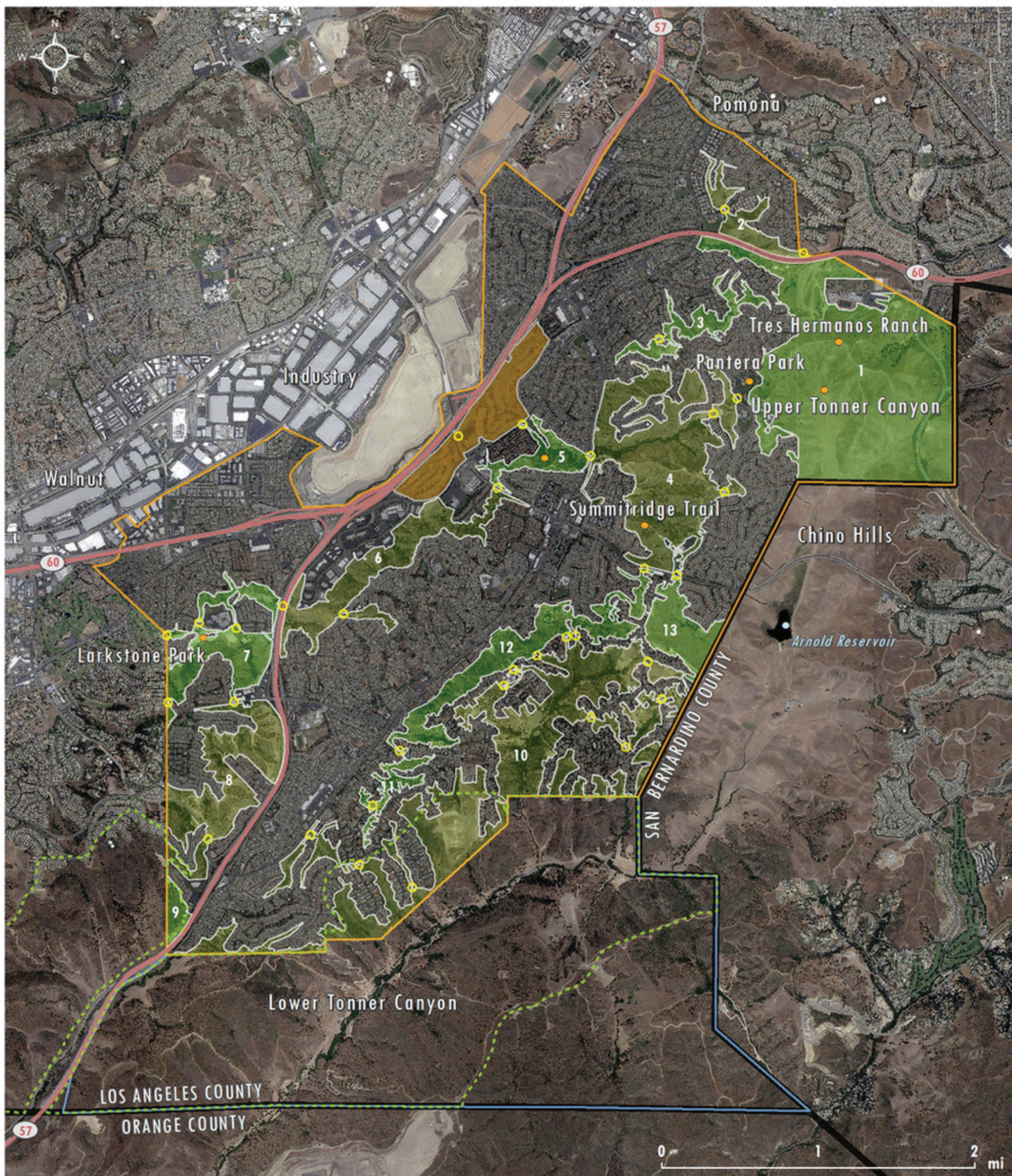
- Crooks, K. R., and M. E. Soulé. 1999. Mesopredator release and avian extinctions in a fragmented system. *Nature* 400:563–566.
- Crooks, K. R., A. V. Suarez, D. T. Bolger, and M. E. Soulé. 2001. Extinction and colonization of birds on habitat islands. *Conservation Biology* 15(1):159–172.
- Drolet, A., C. Dussault, and S. D. Côté. 2016. Simulated drilling noise affects the space use of a large terrestrial mammal. *Wildlife Biology* 22(6):284–293.
- Dyett & Bhatia. 2017. City of Diamond Bar General Plan Update, Existing Conditions Report – Volume III. Redline draft dated February 21, 2017, prepared for City of Diamond Bar.
- Fahrig, L. 2003. Effects of habitat fragmentation on biodiversity. *Annual Review of Ecology, Evolution, and Systematics* 34:487–515.
- Fisher, R. N., A. V. Suarez, and T. J. Case. 2002. Spatial patterns in the abundance of the Coastal Horned Lizard. *Conservation Biology* 16(1):205–215.
- Fletcher Jr., R. J., L. Ries, J. Battin, and A. D. Chalfoun. 2007. The role of habitat area and edge in fragmented landscapes: definitively distinct or inevitably intertwined? *Canadian Journal of Zoology* 85:1017–1030.
- Haas, C., and K. Crooks. 1999. Carnivore Abundance and Distribution Throughout the Puente-Chino Hills, Final Report – 1999. Report prepared for The Mountains Recreation and Conservation Authority and State of California Department of Transportation.
- Haas, C., and G. Turschak. 2002. Responses of Large and Medium-bodied Mammals to Recreation Activities: the Colima Road Underpass. Final report prepared by US Geological Survey for Puente Hills Landfill Native Habitat Preservation Authority.
- Haas, C. D., A. R. Backlin, C. Rochester, and R. N. Fisher. 2006. Monitoring Reptiles and Amphibians at Long-Term Biodiversity Monitoring Stations: the Puente-Chino Hills. Final report prepared by US Geological Survey for Mountains Recreation and Conservation Authority, Puente Hills Landfill Native Habitat Preservation Authority, and California State Parks.
- Harrison, S., and E. Bruna. 1999. Habitat fragmentation and large-scale conservation: what do we know for sure? *Ecography* 22(3):225–232.
- Holway, D. A. 2005. Edge effects of an invasive species across a natural ecological boundary. *Biological Conservation* 121:561–567.
- Holway, D. A. and A. V. Suarez. 2006. Homogenization of ant communities in Mediterranean California: the effects of urbanization and invasion. *Biological Conservation* 127:319–326.
- Hung, K. J., J. S. Ascher, J. Gibbs, R. E. Irwin, and D. T. Bolger. 2015. Effects of fragmentation on a distinctive coastal sage scrub bee fauna revealed through incidental captures by pitfall traps. *Journal of Insect Conservation* DOI 10.1007.
- Kristan, W. B. III, A. J. Lynam, M. V. Price, and J. T. Rotenberry. 2003. Alternative causes of edge-abundance relationships in birds and small mammals of California coastal sage scrub. *Ecography* 26:29–44.
- Laakkonen, J., R. N. Fisher, and T. J. Case. 2001. Effect of land cover, habitat fragmentation and ant colonies on the distribution and abundance of shrews in southern California. *Journal of Animal Ecology* 70(5):776–788.
- Laurance, W. F., and R. O. Bierregaard Jr., eds. 1997. *Tropical forest remnants: ecology, management, and*

- conservation of fragmented communities. University of Chicago Press, Chicago.
- Laurance, W. F., H. E. M. Nascimento, S. G. Laurance, A. Andrade, R. M. Ewers, K. E. Harms, R. C. C. Luizão, and J. E. Ribeiro. 2007. Habitat fragmentation, variable edge effects, and the landscape-divergence hypothesis. *PLoS ONE* 2(10):e1017.
- Los Angeles County, Dept. of Regional Planning. 2014. Los Angeles County Oak Woodlands Conservation Management Plan Guide. Report dated March 18, 2014. Described as a “resource for assisting County staff when processing development applications that are not exempt from the California Environmental Quality Act (CEQA) and may impact oak woodlands. The Guide includes definitions, application procedures, case processing, project mitigation and mitigation monitoring.”
http://planning.lacounty.gov/assets/upl/project/oakwoodlands_conservation-management-plan-guide.pdf
- Matlack, G. R. 1994. Vegetation dynamics of the forest edge – trends in space and successional time. *Journal of Ecology* 82(1):113–123.
- Mattoni, R., and T. Longcore. 1997. The Los Angeles coastal prairie, a vanished community. *Crossosoma* 23:71–102.
- McCaull, J. 1994. The natural community conservation planning program and the coastal sage scrub ecosystem of southern California. *In* Environmental Policy and Biodiversity (R. E. Grumbine, editor). Island Press, Washington, D.C.
- Mitrovich, M., T. Matsuda, K. H. Pease, and R. N. Fisher. 2010. Ants as a measure of effectiveness of habitat conservation planning in southern California. *Conservation Biology* 24:1239–1248.
- Murcia, C. 1995. Edge effects in fragmented forests: implications for conservation. *Trends in Ecology & Evolution* 10(2):58–62.
- Noss, R. F. 1983. A regional landscape approach to maintain diversity. *BioScience* 33(11):700–706.
- O’Leary, J. F. 1990. California coastal sage scrub: general characteristics and considerations for biological conservation. *In*: A. A. Schoenherr (ed.). *Endangered Plant Communities of Southern California*, Southern California Botanists Special Publication No. 3.
- Ries, L., and T. D. Sisk. 2004. A predictive model of edge effects. *Ecology* 85(11):2917–2926.
- Riley, S. P. D., G. T. Busteed, L. B. Kats, T. L. Vandergon, L. F. S. Lee, R. G. Dagit, J. L. Kerby, R. N. Fisher, and R. M. Sauvajot. 2005. Effects of urbanization on the distribution and abundance of amphibians and invasive species in southern California streams. *Conservation Biology* 19:1894–1907.
- Sage Environmental Group. 2012. Affordable Housing Land Use and Zoning Designation Project, Biological Survey Report. Report dated August 2012 prepared for City of Diamond Bar.
- Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. *A Manual of California Vegetation*, second edition. California Native Plant Society, Sacramento.
- Sisk, T. D., N. M. Haddad, and P. R. Ehrlich. 1997. Bird assemblages in patchy woodlands: modeling the effects of edge and matrix habitats. *Ecological Applications* 7(4):1170–1180.
- Soulé, M. E. 1991. Theory and strategy. *In*: W. E. Hudson (ed.). *Landscape Linkages and Biodiversity*. Island Press, Covello, CA.
- Soulé, M. E., A. C. Alberts, and D. T. Bolger. 1992. The effects of habitat fragmentation on chaparral plants and vertebrates. *Oikos* 63(1):39–47.



- Soulé, M. E., D. T. Bolger, A. C. Alberts, J. Wright, M. Sorice, and S. Hill. 1988. Reconstructed dynamics of rapid extinctions of chaparral-requiring birds in urban habitat islands. *Conservation Biology* 2(1):75–92.
- Suarez, A. V., D. T. Bolger and T. J. Case. 1998. Effects of fragmentation and invasion on native ant communities in coastal southern California. *Ecology* 79(6):2041–2056.
- Temple, S. A., and J. R. Cary. 1988. Modeling dynamics of habitat-interior bird populations in fragmented landscapes. *Conservation Biology* 2(4):340–347.
- Treseder, K. K., and K. L. McGuire. 2009. Links Between Plant and Fungal Diversity in Habitat Fragments of Coastal Sage Scrub. The 94th ESA Annual Meeting, 2009.
- U.S. Environmental Protection Agency. 2008. Risk mitigation decision for ten rodenticides. Report dated May 28, 2008. <https://www.regulations.gov/document?D=EPA-HQ-OPP-2006-0955-0764>
- Vandergast, A. G., A. J. Bohonak, D. B. Weissman, and R. N. Fisher. 2006. Understanding the genetic effects of recent habitat fragmentation in the context of evolutionary history: phylogeography and landscape genetics of a southern California endemic Jerusalem cricket (Orthoptera: Stenopelmatidae: *Stenopelmatatus*). *Molecular Ecology* 16:977–92.
- Vaughan, J. R. 2010. Local Geographies of the Coastal Cactus Wren and the Coastal California Gnatcatcher on Marine Corps Base Camp Pendleton. Master of Science thesis, San Diego State University, San Diego, California. 97 pp.
- Wilcove, D. S. 1985. Nest predation in forest tracks and the decline of migratory songbirds. *Ecology* 66(4):1211–1214.
- Wolkovich, E. M., D. T. Bolger, and K. L. Cottingham. 2009. Invasive grass litter facilitates native shrubs through abiotic effects. *Journal of Vegetation Science* 20:1121–1132.
- Woodroffe, R., and J. R. Ginsberg. 1998. Edge effects and the extinction of populations inside protected areas. *Science* 280:2126–2128.

City of Diamond Bar

BIOLOGICAL RESOURCES Natural Communities



Natural Open Space Areas

-  Diamond Bar City Limits
-  Sphere of Influence
-  Diamond Bar Golf Course
-  County Line
-  Natural Open Space Area
-  SEA 15
-  Potential Habitat Linkages/Choke Points



HAMILTON BIOLOGICAL

World Image Basemap (Clarity) from ESRI, 2017. North American Primary Roads from ESRI, 2018. County Boundary from USGS. Diamond Bar City Limits, Significant Ecological Area (SEA prior OVOV / AV / GP adoption) Digitized from Los Angeles County, 2015. Map Projection: Universal Transverse of Mercator. Datum: WGS84. Map Scale 1:65,000. Graphic Scale Units: Miles.

City of Diamond Bar

BIOLOGICAL RESOURCES Natural Communities

The City of Diamond Bar natural open spaces are identified by “Natural Communities” (also known as “plant communities” or “vegetation types”) that occur in the city and its Sphere of Influence (i.e., Tonner Canyon/Significant Ecological Area 15, located in unincorporated Los Angeles County south of the city limits. Natural living ecosystems do not recognize man-made boundaries.)



ANNUAL AND PERENNIAL GRASSLANDS, VERNAL POOLS/SEASONAL POOLS

Natural Open Space Areas: 1, 2, 6, 8, 10, 13, Sphere of Influence



COASTAL SAGE SCRUB, OPUNTIA LITTORALIS SHRUBLAND

Natural Open Space Areas: 1, 4, 7, 8, 10, Sphere of Influence



CHAPARRAL

Natural Open Space Areas: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, Sphere of Influence



COAST LIVE OAK WOODLAND, SAVANNAH

Natural Open Space Areas: 1, 3, 4, 6, 7, 8, 10, 11, 12, Sphere of Influence



CALIFORNIA WALNUT WOODLAND, SAVANNAH

Natural Open Space Areas: 1, 2, 4, 5, 6, 10, 12, Sphere of Influence



RIPARIAN SCRUB AND WOODLANDS

Natural Open Space Areas: 1, 4, 5, 6, 7, 8, 10, 12, 13, Diamond Bar Golf Course, Sphere of Influence



HUMAN-ALTERED HABITATS

Developed areas, such as turf/landscaped parks and the Diamond Bar Golf Course, generally do not support Natural Communities, but these areas may nevertheless play important ecological roles. For example, the golf course includes large number of ornamental trees that comprise a non-native woodland that supports a wide variety of resident and migratory native birds, presumably including nesting raptors, and the man-made lake provides habitat for migratory and resident waterfowl.

Details of these natural communities are stated page 9-12 in the Biological Resources report.



January 22, 2020

Submitted through the Connect SoCal website:

<https://www.connectsocial.org/Pages/Connect-SoCal-Comment-System.aspx>

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

RE: Comments on the 2020 Draft Connect SoCal

Dear Connect SoCal Team:

Friends of Harbors, Beaches and Parks (FHBP) has been engaged with the Southern California Association of Governments (SCAG) for many years—most recently through its ongoing Natural Lands Working Group. In 2012, we formed a coalition that promoted open space policies and regional advance mitigation programs (RAMPs) at the SCAG level. These policies were ultimately adopted by SCAG leadership in the 2012 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This was done a second time with the 2016 RTP/SCS. We are pleased to gain a broader, more inclusive, and geographically diverse coalition for the 2020 Plan (Connect SoCal) and though we have substantive comments below, we are supportive of the 2020 Connect SoCal Natural and Farmlands policies.

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 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, allows more thoughtful science-based conservation planning to occur, and is supported by many conservation and community organizations. This, and our involvement in the creation of the Natural Lands Policy in the 2012 Orange County SCS, drew our attention and focus to the SCAG RTP/SCS and opportunities for a more regional effort there. We are grateful to be involved in the process and to have developed an excellent working relationship with SCAG leadership and staff.

Below are our comments on the SCAG Connect SoCal Plan segmented by topic and chapter.

Additions shown as *italics*

Deletions shown as ~~strikethrough~~

SoCal Connect (Plan)

Executive Summary

We support the focus of “Fit it First” and encourage local transportation agencies to stop building new roads. History has shown that building new roads or widening freeways and roads does not solve the traffic problem—it simply allows more single occupant vehicles to be on the road, which SCAG is trying to avoid to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

It is exciting to see new tools such as tax increment financing included in the plan. However, there was a missed opportunity in the Executive Summary and throughout the Plan itself. We believe that tax-increment finance districts can and should be used to fund open space conservation. Our parks and open spaces are part of the community infrastructure that our taxes support—as the cities grow, so will our need for more parkland. Further, most cities do not meet the requirements of the Quimby Act. The 1975 Quimby Act established a statewide requirement that developers set aside land, donate conservation easements, or pay fees for park improvements (called park in lieu fees). Many jurisdictions have enacted local ordinances that require the maximum number of park acres per person under the Quimby Act - or 5 acres per 1,000 residents. As more houses are built and more land is used, more parkland will be needed as well. We suggest the following modifications:

Proposed Policy Modification (Plan, Pg. 49)

Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure, *including parks and open space*, and development projects.

Similarly, the comment about value capture tools and financing also applies to the “Support Implementation of Sustainability Policies” in the SCS (Pg. 27 & 29), as parks are part of our community infrastructure.

Proposed Modification (SCS, Pg. 27)

Support cities in the establishment of EIFDs, CRIAs, or other tax increment or value capture tools to finance sustainable infrastructure, *including parks and open space*, and development projects.

Proposed Modification (SCS, Pg. 29)

TIF is an important tool in the creation of sustainable communities, and NIFTIs specifically can fund multifamily affordable housing, transit capital projects, transit-oriented development, complete-streets capital projects, parking, *parks and open space*, and programs to reduce GHG emissions and VMT within TPAs.

Overarching Goals

We appreciate the effort to locate housing, jobs, and transit closer together and in priority growth areas, while simultaneously preserving natural resources and farmlands. It was great to see this consistent thread woven throughout the document.

When reviewing the 10 priorities of the Connect SoCal Plan, we noticed that the preservation of natural resources and farmlands actually aligns well with several other goals including:

1. Encourage regional economic prosperity and global competitiveness.
5. Reduce greenhouse gas emissions and improve air quality.
6. Support healthy and equitable communities.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.

Often one policy can support another, and this can be accomplished with the goal of conservation.

Chapter 1: How the Plan was Developed

As the Plan was being developed, participants (FHBP included) in the planning workshops were asked to review four potential growth scenarios and strategies that go with those scenarios. Unfortunately, we found this exercise inequitable because not all growth scenarios apply to every geography in the SCAG region and therefore the strategies cannot apply equally across the region either.

For example, in a very urban area, creating an urban growth boundary or setting aside land for conservation is not feasible or realistic. However, those actions could work in areas that are still bordered by natural lands and are more suburban or rural. Different geographies need different strategies and different conservation tools. We hope that, in the next scenario development exercise in 2023, this will be considered and therefore make the exercise more realistic. Accordingly, we make the following suggestion:

Solution for Future Plan Exercises

Be cognizant of the tools provided and how they will or will not apply to each land use type. For example, tools used in an urban geography are likely not the same as those used in a rural geography.

Chapter 2: SoCal Today

We appreciate acknowledgement in the document that our habitat lands face severe development pressure and that those same lands are a valuable asset to our region, residents, and visitors. However, the document implies that construction, infill, and other “development based” activities are the only activities to generate economic growth. It is important to note that our natural lands and agricultural industry are also economic engines for the region. For every dollar invested in conserving natural lands, an estimated \$2.37 is generated through local sales, recreation purchases, gas, and snack/food purchases from outdoor enthusiasts. This is significant in its own right.

We commend cities and counties that prioritize conservation of our open spaces. Between acquisitions, policy adoption, mitigation measures, and public-private partnerships, local and regional governments have been successful at adding natural lands to the inventory. Here are a few of those examples:

- Laguna Beach residents (Orange County) taxed themselves decades ago to fund what essentially became an urban growth boundary around the city to protect their quality of life by purchasing hillsides.
- In San Bernardino County, efforts are currently underway to create a Regional Conservation Investment Strategy that closely links appropriate development locations with priority conservation areas.
- In Los Angeles County, a newly updated ordinance focuses on areas in need of more protection due to sensitive natural resources through an updated Significant Ecological Area layer.
- In Ventura County, residents passed Save Open Space and Agricultural Resources (SOAR), which includes a series of eight voter initiatives that require a majority vote of the people before agricultural land or open space can be rezoned for development.
- Both Riverside and Imperial Counties have implemented thoughtful conservation plans that aim to protect thousands upon thousands of acres as development and transportation projects advance.

While cities and counties participated in land preservation, conservation based non-profits have also contributed, delivering numerous park bonds, public and private conservation dollars, and acquisition and restoration projects that benefit our region. It is a disservice to limit acknowledgement of the conservation efforts to only municipalities. Therefore, we propose these modifications:

Proposed Modification (Plan, Pg. 36)

Many counties, *cities* and ~~cities~~ *conservation groups* in Southern California have excelled in their work to protect these vulnerable lands, but few plans or policies have been enacted to preserve habitat and farmlands on a regional scale.

Proposed Modification (N&FL Appendix, Pg. 4)

For the past several years, many of the SCAG region’s local governments, *public agencies* and ~~public agencies~~ *conservation groups* have taken action to conserve natural and farmlands through a number of policies and programs.

Chapter 3: A Path to Greater Access, Mobility & Sustainability

We hope that the Sustainable Community Strategies, specifically those listed in the Green Region, can be implemented across the Southland. The Plan’s goal is to “avoid growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas, and flood plains” (Pg. 55). We fully support this, but remind SCAG that all of Southern California is part of the California Floristic Province—making the entire geography a “biodiverse area” that is threatened with development.

Further, many of our state and federally listed threatened and endangered species reside in our (protected and unprotected) natural areas. Decisions about what happens to the landscape (land use conversion) where these sensitive species live starts with local land use planners. Efforts are underway to list additional species on the California endangered species list, including the sub-species of mountain lion found in the Santa Ana Mountains. Without connections between open spaces, this local cougar population will face the genetic consequences of inbreeding and will

eventually the population will die out. Again, these connections between open spaces come back to land use decisions.

While we appreciate the link this plan provides between environmental mitigation and transportation planning (Pg. 58)—it is high time that all infrastructure projects provide that link. RAMPs should also be incorporated for water, electric, solar, wastewater, natural gas, and other infrastructure. All of these projects have environmental impacts. As an example, the Central Valley and Sacramento Valley RAMP Pilot Program linked both road and water projects in a RAMP. We are asking SCAG to expand the list in this section to more than just transportation projects so that the impacts of all projects are thoughtfully and comprehensively mitigated. Accordingly, we propose the following modifications:

Proposed Modification (Plan, Pg. 58)

Advance mitigation also benefits ~~transportation~~ *all* agencies with a more efficient permitting process, as well as reduced cost escalation and project delay. Regional advance mitigation planning takes this concept further and establishes inventories of anticipated impacts from ~~transportation~~ *infrastructure* projects across the region.

Chapter 6: Looking Ahead

We agree with the statement made on page 150: “Real progress can be made towards sustainable results over the next twenty-five years if cities and counties are equipped with sufficient resources and practical tools.” Unfortunately, we have found in our interactions with local cities and the County of Orange, that not only do their general plans not support this concept, but neither do the zoning codes. Further, in many instances, the planners, planning commissions, and city councils/boards of supervisors do not have a clear understanding of what “sustainable” actually means. SCAG is in a perfect position to serve as a clearinghouse for innovative policies, programs, sustainability efforts, etc., through its Toolbox Tuesday webinars or other training opportunities. As they say, “you don’t know what you don’t know.” We strongly recommend that SCAG use its regional leadership position and resources to teach, train, and educate.

Sustainable Communities Strategy (SCS)

We agree that development is occurring at the fringes of the urbanized region and in many instances these are places that (1) burn frequently, (2) lack appropriate infrastructure for houses, and (3) promote the single occupant vehicle habit. We suggest providing information to local cities and counties about how these fringe developments **add** GHG and VMT and that conservation of that land reduces those impacts. A landowner’s decision to sell their land for conservation supports private property rights and local control.

As it relates to the climate change issues raised (Pg. 3)—we appreciate your acknowledgement of these issues (extreme heat, sea level rise, wildfire frequency, and changing rainfall levels).

However, we are concerned at how the NIMBY (Not in my Backyard) and public opposition to projects was framed in the SCS. While we are aware that residents may oppose projects for any number of reasons, but finger pointing to NIMBYs as the problem isn’t helpful.

Trust in government is at an all-time low, and yet resident engagement is increasing. Any local opposition is tagged NIMBYism. And, the connotation behind the word “public” remains negative. Often times, residents’ main goal is to achieve a balanced policy solution to their concerns, and local activism on a controversial project should be seen as an opportunity for convening a public policy discussion on key issues. It appears that what decision makers perceive as frustration by the public is really a lack of tools deployed to resolve the issues. Training opportunities for decision makers exist that could help bridge this gap are offered by the Public Policy Institute of Pepperdine, as one example.

Further, every city in the SCAG region should have a goal to become a “responsive government” that pays attention to the residents, businesses, and visitors. Engaging the residents in goal setting is essential to creating a shared outcome that aligns the community, business, and city’s interests—a view *everyone* can support. A good public process includes not only results in a cost effective, timely, and goal-oriented process, but it also considers the culture and history of the topic. The latter seems to be consistently missing from the dialogue. Further, adhering to the policies set in the general plan or zoning code need to be followed or the expectations about a project shift based on the whim of the project applicant.

Residents, businesses, developers, decision makers, and staff all use the governing general plan as tool for understanding what is in store for the community now and in the future. This “rule book” is like a compact between developers, the local government, and residents. It sets the stage for future development and change and offers predictability. Residents often find themselves at odds with projects because developers ask for modifications to the “rule book.” In other words, what the developer wants is not what is codified in the general plan, and so they opt to change the plan—instead of changing the project. This changes the playing field for every project and makes the work that has gone into the general plan moot. Perhaps more importantly, the community’s compact with the governing agency is broken and trust can be lost.

There are many instances where we (the “public”) provide numerous solutions to the problems a particular development faces—and when it comes time to vote on a project, our leaders ignore those suggestions. If there were better training for elected officials on how to interact with the public, address concerns, and listen—many of the issues could be resolved. This type of “blind eye” mentality only perpetuates the “blame game” that public involvement is bad and only leads to opposition.

Within the “Final Growth Vision” (Pg. 22) the SCS states: “...decisions about how growth will actually occur are up to each local jurisdiction.” In other words, the cities can ignore the goals of this plan and do what they want. This is why our point about educating the local jurisdictions about opportunities related to transportation, housing, land use, and conservation are so very important. It is more difficult to ignore good policy when you understand it and its impacts.

One of the items that seems lacking from the “Protect the Environment and Conserve Natural Resources” section (Pg. 24) is that when land is consumed (converted from greenfield to urban uses), GHG emissions and VMT are increased. This should be acknowledged—or alternatively state that leaving natural lands in their existing state sequesters carbon instead of emitting carbon. We suggest the following modifications:

Proposed Modification (SCS, Pg. 24)

By contrast, a pattern that places a greater share of new growth in dispersed standard development patterns consumes more greenfield land. *Additionally, converting greenfield and agricultural lands typically adds GHG and VMT to the region.*

We support the approach to this plan to avoid high hazard areas for wildland fires, sea level rise, flooding, etc. The less we build in those locations, the less we have to defend them and rebuild them in the future.

Within the “Promote a Green Region” (Pg. 27), “reducing consumption of resource areas, including agricultural areas” does not actually protect the land. The conservation mechanism is missing.

Proposed Policy Modification (SCS, Pg. 27)

“Protect ~~Reducing consumption of~~ resource areas, including agricultural land.”

This gets at the same intent (not converting it to urban uses), but actually takes the step forward of protecting it so the possibility of future potential conversions never has to happen again.

Page 29 covers the “Tools” that can be used to help with sustainable placemaking, specifically urban heat island reduction. This component easily benefits disadvantaged communities throughout the Southland and should be incorporated as a tool for the Environmental Justice Appendix. Inclusion of trees makes urban areas cooler, provides more shade for those on bike or foot, improves the sense of community, and cleans the air.

FHBP supports, in full, the absolute constraint (Pg. 32) that growth cannot or should not occur in existing open spaces or on conserved land. We would urge that easement lands and mitigation sites also get included in this list. As for the variable constraints, we agree with this list as well—especially the inclusion of wildland-urban interface and wildfire prone areas (Calfire Very High Fire Severity Zones).

Proposed Policy Modification (SCS, Pg. 32)

- Conserved *and easement* lands, *as well as mitigation sites*

On Page 33, the list of Data and GIS Maps referenced in this document are helpful. We’d offer the California Conservation Easement Database (CCED) as a future tool. It can be found at: <https://www.calands.org/cced/>.

Demographics and Growth Forecast Appendix

Within the Demographics and Growth Forecast Appendix, it states:

“Following public input and SCAG’s analysis of the GHG/VMT benefits of the alternative scenarios, a preferred growth forecast scenario was chosen which prioritizes

growth in areas such as job centers and transit priority areas which have regional transportation benefits. (see **EXHIBITS 1-9**.)”

Exhibits 1-9 appear in conflict with the description of the “absolute constraints.” For example, the absolute constraint of not building in existing open spaces or on conserved lands (as described in the SCS, Pg. 32) conflicts with the growth forecast areas. We recognize these growth forecasts were built using the transportation area zones (TAZ) and those zones that do not necessarily align with boundaries of conserved lands, but, these maps provide a false projection of growth in the region and within specific TAZs. The map should depict what is and is not an area of absolute constraint to align with what has been stated previously about where growth can and cannot occur.

Natural & Farmlands Appendix

Vision

FHBP supports the inclusion of natural and farmland preservation as a tool to reduce GHG and VMT. However, we are concerned that the goal of “Promote conservation of natural and agricultural lands and restoration of habitats” lacks the specific actions needed to actually conserve land. We suggest an action-oriented emphasis like “conserve” or “partner to conserve...” as follows:

Proposed Modification (N&FL Appendix, Pg. 2)

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

Proposed Modification (Plan, Pg. 9)

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

Further, FHBP just completed a yearlong study of restoration projects and their rate of success or failure. What we found was that most projects struggled to meet the mitigation measure requirements necessary under the California Environmental Quality Act (CEQA). In several instances (Pg. 2 & 11), the Appendix mentions removing non-native plants. Our study shows that this goal was part of the restoration project too, but the non-native seed bank was able to outcompete the native plants and dominate the landscape after the restoration. So, while improving habitats through removal of non-native plants is a commendable goal, it can be difficult for some to achieve without the proper site preparation, funding, experience, long-term stewardship, etc. Since restoration is a possible focus of this policy, we encourage SCAG to review the information and recommendations from our study. It can be accessed at: <https://www.fhbp.org/resources/studies-reports/ceqa-mitigation-study/>.

Policy & Regulatory Framework

As noted previously under Chapter 2 (the Plan), it is not prudent to rely on cities and counties (1) to protect our natural lands, or (2) to develop plans and policies to conserve them. Specific actions must be taken to ensure the preservation happens in perpetuity—acquisition and

ownership by a park/non-profit, a conservation or agricultural easement, or enrollment in a Conservation Plan.

Regional Conservation Approach

De-emphasizing growth in wetlands, wildlife corridors, and wildfire prone areas is a great step in identifying areas of regional importance. SCAG should consider supporting local, regional, and statewide efforts already underway in the conservation arena—especially where broad coalitions already exist. Along these lines, we suggest the following modification:

Proposed Modification (Plan, Pg. 9)

“To further prioritize natural habitat areas and avoid impacts to the environment, Connect SoCal will seek to deemphasize growth in wetlands, wildlife corridors, high-biodiversity areas, wildfire prone areas, and floodplains. *Aligning SCAG’s role and support with those of local, regional, and statewide conservation efforts is another opportunity.* This approach intends to focus regional growth in existing communities, and reflects various goals of the plan such as adapting to a changing climate and promoting conservation of agriculture and natural lands.”

For example, the Coast to Cleveland Connection focuses on connecting the 22,000+ acres of the Laguna Coast to the Santa Ana Mountains. Efforts are underway with the resource agencies, cities, transportation agencies, non-profits, and park managers to make this happen. When these partnerships are available, SCAG should support them.

Another example is the Hillside Open Space and Education Coalition, which, in 2004, united the cities of Brea, La Habra, La Habra Heights, and Whittier and the unincorporated communities of Hacienda Heights and Rowland Heights. The goal was to seek ways to preserve strategic hillside parcels in the Puente-Chino Hills and to mobilize public resources to preserve and acquire the parcels threatened by development. This Coalition is working with State Parks, local cities, residents, and non-profits. Again, this is another opportunity to support an existing effort—if and when the need arises.

Conservation Policies and Programs in the SCAG Region

We were pleased to see the addition of Agrihoods, the Liberty Canyon Wildlife Crossing, and Ventura County Habitat Connectivity and Wildlife Corridor Ordinance in the lineup of new activities being undertaken in the SCAG region.

For the Orange County Transportation *Authority* (not *Association* as listed on Pg. 14 of the N&FL Appendix), it may be helpful to provide context that the funding available in the Environmental Mitigation Program is five percent of the freeway revenues, which in 2005 dollars was \$243.5 million.

Proposed Modification (Plan, Pg. 9)

“Thirty million dollars for approximately 1,300 acres of land and \$10 million on 350 acres of habitat restoration have been funded through Measure M2. *The Measure provides five percent (\$243.5M in 2005 dollars) of the freeway revenues to fund this program.*”

On Page 16 the first paragraph indicates there are five adopted major conservation plans, but actually demonstrates in the text there are six. This should be corrected as follows:

Proposed Modification (N&FL Appendix, Pg. 16)

“Currently, there are ~~five~~ *six* adopted major conservation plans made up of multiple jurisdictions within SCAG’s boundaries (**EXHIBIT 5**).”

Within the OCTA Measure M2 NCCP/HCP, there have actually been 12 restoration projects funded. The addition of dam removal projects within the Cleveland National Forest were approved by OCTA’s Environmental Oversight Committee in May 2016 and the full OCTA board in February 2017.

Proposed Modification (N&FL Appendix, Pg. 16)

“Since the initial funding round in 2010, 1,300 acres of natural lands have been acquired and ~~eleven~~ *twelve* restoration projects have been funded.”

Exhibit 5 fails to include the Southern HCP in Orange County. Since the OCTA Plan overlays the entirety of both the Central-Coastal and Southern Plans, it may be helpful to have the OCTA plan displayed in a patterned texture on top of the other Orange County plans.

Opportunities

We are pleased to see the inclusion of an opportunities section within the Appendix (Pg. 18). However, we’d like to see this section expanded to more than just the Greenhouse Gas Reduction Fund (GGRF) Resources—there are many other tools, strategies, and techniques that can be utilized to conserve natural lands and simultaneously reduce GHG and VMT. Some other funding sources to conserve natural lands are listed in the Environmental Coalition letter to be submitted January 23, 2020.

Additionally, FHBP completed a study of innovative ways to link housing, transportation, and conservation through policies and funding mechanisms. This study is available for download at: <https://www.fhbp.org/resources/studies-reports/healthy-communities-toolkit/>.

The tools mentioned include items such as:

- Urban Growth Boundaries
- Crowdfunding
- Social Impact Bonds
- Real Estate Transfer Fees
- Community Benefit Fees
- Landfill Tipping Fees
- Differential Development Fees

We recommend extending past the GGRF as the only listed source to support the conservation of natural resources—as there are many others that currently exist at the local, regional, state, and federal level.

Recommended Policies

We have been a supporter of SCAG and its efforts to include natural land preservation in the RTP/SCS. However, we were disappointed to see that of the 10 policies recommended in the Natural and Farmlands Appendix all 10 policies were replicated word for word from the 2016 Appendix. It is as if no further thought into how the natural world has changed or where the locations of intense development pressure now exist. In the four years since the last plan, new policy recommendations could have been created and incorporated. New policies could be pulled from the list above described in the Opportunities section. We recognize that there may be an internal issue with adding “new” policies in an appendix that aren’t captured in the RTP or SCS itself. One solution to this is to rename the section “Strategies” because what is included in the list are actually implementation strategies for achieving a reduction in GHG and VMT using land conservation and restoration as a tool.

Next Steps

Of the five “Next Steps” described in the Appendix, three of them were from the 2016 plan. The only creative next step is the development of the regional greenprint, as SCAG is already engaging stakeholders via the Working Group. What we would have expected from the Next Steps section is a forward advancement of the 2016 activities. Our suggestions are below.

“Encourage Advance Mitigation Programs” could have forward motion by:

- Identifying infrastructure agencies about to adopt major programs/policies that could incorporate these advance mitigation programs.
- Working to retroactively adopt mitigation programs or policies within existing transportation measures.

“Align with Funding Opportunities and Pilot Programs” could have forward motion by:

- Assisting local agencies with tax increment financing measures that include conservation and parks as a key goal.
- Apply for state or federal conservation funding to complete projects of regional and/or statewide significance.
- Launch a pilot program that advances sustainable activities like water quality improvements, natural land acquisition, agricultural easement purchases, or restoration project implementation.
- Feature conservation funding in a Toolbox Tuesday for how local jurisdictions and/or non-profits can fund local projects.

“Provide Incentives for Jurisdictions to Work Across County Lines” could have forward motion by:

- Engaging with cross-jurisdictional conservation alliances to add support, value, and funding to the effort.
- Focus SCAG grants on conservation projects of regional significance as a tool for connecting habitat lands together cross-jurisdictionally.
- Identify locations where cross-jurisdictional alliances should exist and bring the parties together.

Thank you for the opportunity to comment the Connect SoCal documents. We hope our feedback is constructive and helps SCAG achieve its overarching goal of [REDACTED]

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Wellborn".

Michael Wellborn
President





January 22, 2020

Submitted through the Connect SoCal website:

<https://www.connectsocial.org/Pages/Connect-SoCal-Comment-System.aspx>

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TIF is an important tool in the creation of sustainable communities, and NIFTIs specifically can fund multifamily affordable housing, transit capital projects, transit-oriented development, complete-streets capital projects, parking, *parks and open space*, and programs to reduce GHG emissions and VMT within TPAs.

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We appreciate the effort to locate housing, jobs, and transit closer together and in priority growth areas, while simultaneously preserving natural resources and farmlands. It was great to see this consistent thread woven throughout the document.

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5. Reduce greenhouse gas emissions and improve air quality.
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Often one policy can support another, and this can be accomplished with the goal of conservation.

Chapter 1: How the Plan was Developed

As the Plan was being developed, participants (FHBP included) in the planning workshops were asked to review four potential growth scenarios and strategies that go with those scenarios. Unfortunately, we found this exercise inequitable because not all growth scenarios apply to every geography in the SCAG region and therefore the strategies cannot apply equally across the region either.

For example, in a very urban area, creating an urban growth boundary or setting aside land for conservation is not feasible or realistic. However, those actions could work in areas that are still bordered by natural lands and are more suburban or rural. Different geographies need different strategies and different conservation tools. We hope that, in the next scenario development exercise in 2023, this will be considered and therefore make the exercise more realistic. Accordingly, we make the following suggestion:

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Be cognizant of the tools provided and how they will or will not apply to each land use type. For example, tools used in an urban geography are likely not the same as those used in a rural geography.

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We appreciate acknowledgement in the document that our habitat lands face severe development pressure and that those same lands are a valuable asset to our region, residents, and visitors. However, the document implies that construction, infill, and other “development based” activities are the only activities to generate economic growth. It is important to note that our natural lands and agricultural industry are also economic engines for the region. For every dollar invested in conserving natural lands, an estimated \$2.37 is generated through local sales, recreation purchases, gas, and snack/food purchases from outdoor enthusiasts. This is significant in its own right.

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For the past several years, many of the SCAG region’s local governments, *public agencies* and ~~public agencies~~ *conservation groups* have taken action to conserve natural and farmlands through a number of policies and programs.

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We hope that the Sustainable Community Strategies, specifically those listed in the Green Region, can be implemented across the Southland. The Plan’s goal is to “avoid growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas, and flood plains” (Pg. 55). We fully support this, but remind SCAG that all of Southern California is part of the California Floristic Province—making the entire geography a “biodiverse area” that is threatened with development.

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eventually the population will die out. Again, these connections between open spaces come back to land use decisions.

While we appreciate the link this plan provides between environmental mitigation and transportation planning (Pg. 58)—it is high time that all infrastructure projects provide that link. RAMPs should also be incorporated for water, electric, solar, wastewater, natural gas, and other infrastructure. All of these projects have environmental impacts. As an example, the Central Valley and Sacramento Valley RAMP Pilot Program linked both road and water projects in a RAMP. We are asking SCAG to expand the list in this section to more than just transportation projects so that the impacts of all projects are thoughtfully and comprehensively mitigated. Accordingly, we propose the following modifications:

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Advance mitigation also benefits ~~transportation~~ *all* agencies with a more efficient permitting process, as well as reduced cost escalation and project delay. Regional advance mitigation planning takes this concept further and establishes inventories of anticipated impacts from ~~transportation~~ *infrastructure* projects across the region.

Chapter 6: Looking Ahead

We agree with the statement made on page 150: “Real progress can be made towards sustainable results over the next twenty-five years if cities and counties are equipped with sufficient resources and practical tools.” Unfortunately, we have found in our interactions with local cities and the County of Orange, that not only do their general plans not support this concept, but neither do the zoning codes. Further, in many instances, the planners, planning commissions, and city councils/boards of supervisors do not have a clear understanding of what “sustainable” actually means. SCAG is in a perfect position to serve as a clearinghouse for innovative policies, programs, sustainability efforts, etc., through its Toolbox Tuesday webinars or other training opportunities. As they say, “you don’t know what you don’t know.” We strongly recommend that SCAG use its regional leadership position and resources to teach, train, and educate.

Sustainable Communities Strategy (SCS)

We agree that development is occurring at the fringes of the urbanized region and in many instances these are places that (1) burn frequently, (2) lack appropriate infrastructure for houses, and (3) promote the single occupant vehicle habit. We suggest providing information to local cities and counties about how these fringe developments **add** GHG and VMT and that conservation of that land reduces those impacts. A landowner’s decision to sell their land for conservation supports private property rights and local control.

As it relates to the climate change issues raised (Pg. 3)—we appreciate your acknowledgement of these issues (extreme heat, sea level rise, wildfire frequency, and changing rainfall levels).

However, we are concerned at how the NIMBY (Not in my Backyard) and public opposition to projects was framed in the SCS. While we are aware that residents may oppose projects for any number of reasons, but finger pointing to NIMBYs as the problem isn’t helpful.

Trust in government is at an all-time low, and yet resident engagement is increasing. Any local opposition is tagged NIMBYism. And, the connotation behind the word “public” remains negative. Often times, residents’ main goal is to achieve a balanced policy solution to their concerns, and local activism on a controversial project should be seen as an opportunity for convening a public policy discussion on key issues. It appears that what decision makers perceive as frustration by the public is really a lack of tools deployed to resolve the issues. Training opportunities for decision makers exist that could help bridge this gap are offered by the Public Policy Institute of Pepperdine, as one example.

Further, every city in the SCAG region should have a goal to become a “responsive government” that pays attention to the residents, businesses, and visitors. Engaging the residents in goal setting is essential to creating a shared outcome that aligns the community, business, and city’s interests—a view *everyone* can support. A good public process includes not only results in a cost effective, timely, and goal-oriented process, but it also considers the culture and history of the topic. The latter seems to be consistently missing from the dialogue. Further, adhering to the policies set in the general plan or zoning code need to be followed or the expectations about a project shift based on the whim of the project applicant.

Residents, businesses, developers, decision makers, and staff all use the governing general plan as tool for understanding what is in store for the community now and in the future. This “rule book” is like a compact between developers, the local government, and residents. It sets the stage for future development and change and offers predictability. Residents often find themselves at odds with projects because developers ask for modifications to the “rule book.” In other words, what the developer wants is not what is codified in the general plan, and so they opt to change the plan—instead of changing the project. This changes the playing field for every project and makes the work that has gone into the general plan moot. Perhaps more importantly, the community’s compact with the governing agency is broken and trust can be lost.

There are many instances where we (the “public”) provide numerous solutions to the problems a particular development faces—and when it comes time to vote on a project, our leaders ignore those suggestions. If there were better training for elected officials on how to interact with the public, address concerns, and listen—many of the issues could be resolved. This type of “blind eye” mentality only perpetuates the “blame game” that public involvement is bad and only leads to opposition.

Within the “Final Growth Vision” (Pg. 22) the SCS states: “...decisions about how growth will actually occur are up to each local jurisdiction.” In other words, the cities can ignore the goals of this plan and do what they want. This is why our point about educating the local jurisdictions about opportunities related to transportation, housing, land use, and conservation are so very important. It is more difficult to ignore good policy when you understand it and its impacts.

One of the items that seems lacking from the “Protect the Environment and Conserve Natural Resources” section (Pg. 24) is that when land is consumed (converted from greenfield to urban uses), GHG emissions and VMT are increased. This should be acknowledged—or alternatively state that leaving natural lands in their existing state sequesters carbon instead of emitting carbon. We suggest the following modifications:

Proposed Modification (SCS, Pg. 24)

By contrast, a pattern that places a greater share of new growth in dispersed standard development patterns consumes more greenfield land. *Additionally, converting greenfield and agricultural lands typically adds GHG and VMT to the region.*

We support the approach to this plan to avoid high hazard areas for wildland fires, sea level rise, flooding, etc. The less we build in those locations, the less we have to defend them and rebuild them in the future.

Within the “Promote a Green Region” (Pg. 27), “reducing consumption of resource areas, including agricultural areas” does not actually protect the land. The conservation mechanism is missing.

Proposed Policy Modification (SCS, Pg. 27)

“Protect ~~Reducing consumption of~~ resource areas, including agricultural land.”

This gets at the same intent (not converting it to urban uses), but actually takes the step forward of protecting it so the possibility of future potential conversions never has to happen again.

Page 29 covers the “Tools” that can be used to help with sustainable placemaking, specifically urban heat island reduction. This component easily benefits disadvantaged communities throughout the Southland and should be incorporated as a tool for the Environmental Justice Appendix. Inclusion of trees makes urban areas cooler, provides more shade for those on bike or foot, improves the sense of community, and cleans the air.

FHBP supports, in full, the absolute constraint (Pg. 32) that growth cannot or should not occur in existing open spaces or on conserved land. We would urge that easement lands and mitigation sites also get included in this list. As for the variable constraints, we agree with this list as well—especially the inclusion of wildland-urban interface and wildfire prone areas (Calfire Very High Fire Severity Zones).

Proposed Policy Modification (SCS, Pg. 32)

- Conserved *and easement* lands, *as well as mitigation sites*

On Page 33, the list of Data and GIS Maps referenced in this document are helpful. We’d offer the California Conservation Easement Database (CCED) as a future tool. It can be found at: <https://www.calands.org/cced/>.

Demographics and Growth Forecast Appendix

Within the Demographics and Growth Forecast Appendix, it states:

“Following public input and SCAG’s analysis of the GHG/VMT benefits of the alternative scenarios, a preferred growth forecast scenario was chosen which prioritizes

growth in areas such as job centers and transit priority areas which have regional transportation benefits. (see **EXHIBITS 1-9**.)”

Exhibits 1-9 appear in conflict with the description of the “absolute constraints.” For example, the absolute constraint of not building in existing open spaces or on conserved lands (as described in the SCS, Pg. 32) conflicts with the growth forecast areas. We recognize these growth forecasts were built using the transportation area zones (TAZ) and those zones that do not necessarily align with boundaries of conserved lands, but, these maps provide a false projection of growth in the region and within specific TAZs. The map should depict what is and is not an area of absolute constraint to align with what has been stated previously about where growth can and cannot occur.

Natural & Farmlands Appendix

Vision

FHBP supports the inclusion of natural and farmland preservation as a tool to reduce GHG and VMT. However, we are concerned that the goal of “Promote conservation of natural and agricultural lands and restoration of habitats” lacks the specific actions needed to actually conserve land. We suggest an action-oriented emphasis like “conserve” or “partner to conserve...” as follows:

Proposed Modification (N&FL Appendix, Pg. 2)

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

Proposed Modification (Plan, Pg. 9)

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

Further, FHBP just completed a yearlong study of restoration projects and their rate of success or failure. What we found was that most projects struggled to meet the mitigation measure requirements necessary under the California Environmental Quality Act (CEQA). In several instances (Pg. 2 & 11), the Appendix mentions removing non-native plants. Our study shows that this goal was part of the restoration project too, but the non-native seed bank was able to outcompete the native plants and dominate the landscape after the restoration. So, while improving habitats through removal of non-native plants is a commendable goal, it can be difficult for some to achieve without the proper site preparation, funding, experience, long-term stewardship, etc. Since restoration is a possible focus of this policy, we encourage SCAG to review the information and recommendations from our study. It can be accessed at: <https://www.fhbp.org/resources/studies-reports/ceqa-mitigation-study/>.

Policy & Regulatory Framework

As noted previously under Chapter 2 (the Plan), it is not prudent to rely on cities and counties (1) to protect our natural lands, or (2) to develop plans and policies to conserve them. Specific actions must be taken to ensure the preservation happens in perpetuity—acquisition and

ownership by a park/non-profit, a conservation or agricultural easement, or enrollment in a Conservation Plan.

Regional Conservation Approach

De-emphasizing growth in wetlands, wildlife corridors, and wildfire prone areas is a great step in identifying areas of regional importance. SCAG should consider supporting local, regional, and statewide efforts already underway in the conservation arena—especially where broad coalitions already exist. Along these lines, we suggest the following modification:

Proposed Modification (Plan, Pg. 9)

“To further prioritize natural habitat areas and avoid impacts to the environment, Connect SoCal will seek to deemphasize growth in wetlands, wildlife corridors, high-biodiversity areas, wildfire prone areas, and floodplains. *Aligning SCAG’s role and support with those of local, regional, and statewide conservation efforts is another opportunity.* This approach intends to focus regional growth in existing communities, and reflects various goals of the plan such as adapting to a changing climate and promoting conservation of agriculture and natural lands.”

For example, the Coast to Cleveland Connection focuses on connecting the 22,000+ acres of the Laguna Coast to the Santa Ana Mountains. Efforts are underway with the resource agencies, cities, transportation agencies, non-profits, and park managers to make this happen. When these partnerships are available, SCAG should support them.

Another example is the Hillside Open Space and Education Coalition, which, in 2004, united the cities of Brea, La Habra, La Habra Heights, and Whittier and the unincorporated communities of Hacienda Heights and Rowland Heights. The goal was to seek ways to preserve strategic hillside parcels in the Puente-Chino Hills and to mobilize public resources to preserve and acquire the parcels threatened by development. This Coalition is working with State Parks, local cities, residents, and non-profits. Again, this is another opportunity to support an existing effort—if and when the need arises.

Conservation Policies and Programs in the SCAG Region

We were pleased to see the addition of Agrihoods, the Liberty Canyon Wildlife Crossing, and Ventura County Habitat Connectivity and Wildlife Corridor Ordinance in the lineup of new activities being undertaken in the SCAG region.

For the Orange County Transportation *Authority* (not *Association* as listed on Pg. 14 of the N&FL Appendix), it may be helpful to provide context that the funding available in the Environmental Mitigation Program is five percent of the freeway revenues, which in 2005 dollars was \$243.5 million.

Proposed Modification (Plan, Pg. 9)

“Thirty million dollars for approximately 1,300 acres of land and \$10 million on 350 acres of habitat restoration have been funded through Measure M2. *The Measure provides five percent (\$243.5M in 2005 dollars) of the freeway revenues to fund this program.*”

On Page 16 the first paragraph indicates there are five adopted major conservation plans, but actually demonstrates in the text there are six. This should be corrected as follows:

Proposed Modification (N&FL Appendix, Pg. 16)

“Currently, there are ~~five~~ *six* adopted major conservation plans made up of multiple jurisdictions within SCAG’s boundaries (**EXHIBIT 5**).”

Within the OCTA Measure M2 NCCP/HCP, there have actually been 12 restoration projects funded. The addition of dam removal projects within the Cleveland National Forest were approved by OCTA’s Environmental Oversight Committee in May 2016 and the full OCTA board in February 2017.

Proposed Modification (N&FL Appendix, Pg. 16)

“Since the initial funding round in 2010, 1,300 acres of natural lands have been acquired and ~~eleven~~ *twelve* restoration projects have been funded.”

Exhibit 5 fails to include the Southern HCP in Orange County. Since the OCTA Plan overlays the entirety of both the Central-Coastal and Southern Plans, it may be helpful to have the OCTA plan displayed in a patterned texture on top of the other Orange County plans.

Opportunities

We are pleased to see the inclusion of an opportunities section within the Appendix (Pg. 18). However, we’d like to see this section expanded to more than just the Greenhouse Gas Reduction Fund (GGRF) Resources—there are many other tools, strategies, and techniques that can be utilized to conserve natural lands and simultaneously reduce GHG and VMT. Some other funding sources to conserve natural lands are listed in the Environmental Coalition letter to be submitted January 23, 2020.

Additionally, FHBP completed a study of innovative ways to link housing, transportation, and conservation through policies and funding mechanisms. This study is available for download at: <https://www.fhbp.org/resources/studies-reports/healthy-communities-toolkit/>.

The tools mentioned include items such as:

- Urban Growth Boundaries
- Crowdfunding
- Social Impact Bonds
- Real Estate Transfer Fees
- Community Benefit Fees
- Landfill Tipping Fees
- Differential Development Fees

We recommend extending past the GGRF as the only listed source to support the conservation of natural resources—as there are many others that currently exist at the local, regional, state, and federal level.

Recommended Policies

We have been a supporter of SCAG and its efforts to include natural land preservation in the RTP/SCS. However, we were disappointed to see that of the 10 policies recommended in the Natural and Farmlands Appendix all 10 policies were replicated word for word from the 2016 Appendix. It is as if no further thought into how the natural world has changed or where the locations of intense development pressure now exist. In the four years since the last plan, new policy recommendations could have been created and incorporated. New policies could be pulled from the list above described in the Opportunities section. We recognize that there may be an internal issue with adding “new” policies in an appendix that aren’t captured in the RTP or SCS itself. One solution to this is to rename the section “Strategies” because what is included in the list are actually implementation strategies for achieving a reduction in GHG and VMT using land conservation and restoration as a tool.

Next Steps

Of the five “Next Steps” described in the Appendix, three of them were from the 2016 plan. The only creative next step is the development of the regional greenprint, as SCAG is already engaging stakeholders via the Working Group. What we would have expected from the Next Steps section is a forward advancement of the 2016 activities. Our suggestions are below.

“Encourage Advance Mitigation Programs” could have forward motion by:

- Identifying infrastructure agencies about to adopt major programs/policies that could incorporate these advance mitigation programs.
- Working to retroactively adopt mitigation programs or policies within existing transportation measures.

“Align with Funding Opportunities and Pilot Programs” could have forward motion by:

- Assisting local agencies with tax increment financing measures that include conservation and parks as a key goal.
- Apply for state or federal conservation funding to complete projects of regional and/or statewide significance.
- Launch a pilot program that advances sustainable activities like water quality improvements, natural land acquisition, agricultural easement purchases, or restoration project implementation.
- Feature conservation funding in a Toolbox Tuesday for how local jurisdictions and/or non-profits can fund local projects.

“Provide Incentives for Jurisdictions to Work Across County Lines” could have forward motion by:

- Engaging with cross-jurisdictional conservation alliances to add support, value, and funding to the effort.
- Focus SCAG grants on conservation projects of regional significance as a tool for connecting habitat lands together cross-jurisdictionally.
- Identify locations where cross-jurisdictional alliances should exist and bring the parties together.

Thank you for the opportunity to comment the Connect SoCal documents. We hope our feedback is constructive and helps SCAG achieve its overarching goal of [REDACTED]

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Wellborn".

Michael Wellborn
President





January 22, 2020

Submitted through the Connect SoCal website:

<https://www.connectsocial.org/Pages/Connect-SoCal-Comment-System.aspx>

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

RE: Comments on the 2020 Draft Connect SoCal

Dear Connect SoCal Team:

Friends of Harbors, Beaches and Parks (FHBP) has been engaged with the Southern California Association of Governments (SCAG) for many years—most recently through its ongoing Natural Lands Working Group. In 2012, we formed a coalition that promoted open space policies and regional advance mitigation programs (RAMPs) at the SCAG level. These policies were ultimately adopted by SCAG leadership in the 2012 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This was done a second time with the 2016 RTP/SCS. We are pleased to gain a broader, more inclusive, and geographically diverse coalition for the 2020 Plan (Connect SoCal) and though we have substantive comments below, we are supportive of the 2020 Connect SoCal Natural and Farmlands policies.

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 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, allows more thoughtful science-based conservation planning to occur, and is supported by many conservation and community organizations. This, and our involvement in the creation of the Natural Lands Policy in the 2012 Orange County SCS, drew our attention and focus to the SCAG RTP/SCS and opportunities for a more regional effort there. We are grateful to be involved in the process and to have developed an excellent working relationship with SCAG leadership and staff.

Below are our comments on the SCAG Connect SoCal Plan segmented by topic and chapter.

Additions shown as *italics*

Deletions shown as ~~strikethrough~~

SoCal Connect (Plan)

Executive Summary

We support the focus of “Fit it First” and encourage local transportation agencies to stop building new roads. History has shown that building new roads or widening freeways and roads does not solve the traffic problem—it simply allows more single occupant vehicles to be on the road, which SCAG is trying to avoid to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

It is exciting to see new tools such as tax increment financing included in the plan. However, there was a missed opportunity in the Executive Summary and throughout the Plan itself. We believe that tax-increment finance districts can and should be used to fund open space conservation. Our parks and open spaces are part of the community infrastructure that our taxes support—as the cities grow, so will our need for more parkland. Further, most cities do not meet the requirements of the Quimby Act. The 1975 Quimby Act established a statewide requirement that developers set aside land, donate conservation easements, or pay fees for park improvements (called park in lieu fees). Many jurisdictions have enacted local ordinances that require the maximum number of park acres per person under the Quimby Act - or 5 acres per 1,000 residents. As more houses are built and more land is used, more parkland will be needed as well. We suggest the following modifications:

Proposed Policy Modification (Plan, Pg. 49)

Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure, *including parks and open space*, and development projects.

Similarly, the comment about value capture tools and financing also applies to the “Support Implementation of Sustainability Policies” in the SCS (Pg. 27 & 29), as parks are part of our community infrastructure.

Proposed Modification (SCS, Pg. 27)

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Advance mitigation also benefits ~~transportation~~ *all* agencies with a more efficient permitting process, as well as reduced cost escalation and project delay. Regional advance mitigation planning takes this concept further and establishes inventories of anticipated impacts from ~~transportation~~ *infrastructure* projects across the region.

Chapter 6: Looking Ahead

We agree with the statement made on page 150: “Real progress can be made towards sustainable results over the next twenty-five years if cities and counties are equipped with sufficient resources and practical tools.” Unfortunately, we have found in our interactions with local cities and the County of Orange, that not only do their general plans not support this concept, but neither do the zoning codes. Further, in many instances, the planners, planning commissions, and city councils/boards of supervisors do not have a clear understanding of what “sustainable” actually means. SCAG is in a perfect position to serve as a clearinghouse for innovative policies, programs, sustainability efforts, etc., through its Toolbox Tuesday webinars or other training opportunities. As they say, “you don’t know what you don’t know.” We strongly recommend that SCAG use its regional leadership position and resources to teach, train, and educate.

Sustainable Communities Strategy (SCS)

We agree that development is occurring at the fringes of the urbanized region and in many instances these are places that (1) burn frequently, (2) lack appropriate infrastructure for houses, and (3) promote the single occupant vehicle habit. We suggest providing information to local cities and counties about how these fringe developments **add** GHG and VMT and that conservation of that land reduces those impacts. A landowner’s decision to sell their land for conservation supports private property rights and local control.

As it relates to the climate change issues raised (Pg. 3)—we appreciate your acknowledgement of these issues (extreme heat, sea level rise, wildfire frequency, and changing rainfall levels).

However, we are concerned at how the NIMBY (Not in my Backyard) and public opposition to projects was framed in the SCS. While we are aware that residents may oppose projects for any number of reasons, but finger pointing to NIMBYs as the problem isn’t helpful.

Trust in government is at an all-time low, and yet resident engagement is increasing. Any local opposition is tagged NIMBYism. And, the connotation behind the word “public” remains negative. Often times, residents’ main goal is to achieve a balanced policy solution to their concerns, and local activism on a controversial project should be seen as an opportunity for convening a public policy discussion on key issues. It appears that what decision makers perceive as frustration by the public is really a lack of tools deployed to resolve the issues. Training opportunities for decision makers exist that could help bridge this gap are offered by the Public Policy Institute of Pepperdine, as one example.

Further, every city in the SCAG region should have a goal to become a “responsive government” that pays attention to the residents, businesses, and visitors. Engaging the residents in goal setting is essential to creating a shared outcome that aligns the community, business, and city’s interests—a view *everyone* can support. A good public process includes not only results in a cost effective, timely, and goal-oriented process, but it also considers the culture and history of the topic. The latter seems to be consistently missing from the dialogue. Further, adhering to the policies set in the general plan or zoning code need to be followed or the expectations about a project shift based on the whim of the project applicant.

Residents, businesses, developers, decision makers, and staff all use the governing general plan as tool for understanding what is in store for the community now and in the future. This “rule book” is like a compact between developers, the local government, and residents. It sets the stage for future development and change and offers predictability. Residents often find themselves at odds with projects because developers ask for modifications to the “rule book.” In other words, what the developer wants is not what is codified in the general plan, and so they opt to change the plan—instead of changing the project. This changes the playing field for every project and makes the work that has gone into the general plan moot. Perhaps more importantly, the community’s compact with the governing agency is broken and trust can be lost.

There are many instances where we (the “public”) provide numerous solutions to the problems a particular development faces—and when it comes time to vote on a project, our leaders ignore those suggestions. If there were better training for elected officials on how to interact with the public, address concerns, and listen—many of the issues could be resolved. This type of “blind eye” mentality only perpetuates the “blame game” that public involvement is bad and only leads to opposition.

Within the “Final Growth Vision” (Pg. 22) the SCS states: “...decisions about how growth will actually occur are up to each local jurisdiction.” In other words, the cities can ignore the goals of this plan and do what they want. This is why our point about educating the local jurisdictions about opportunities related to transportation, housing, land use, and conservation are so very important. It is more difficult to ignore good policy when you understand it and its impacts.

One of the items that seems lacking from the “Protect the Environment and Conserve Natural Resources” section (Pg. 24) is that when land is consumed (converted from greenfield to urban uses), GHG emissions and VMT are increased. This should be acknowledged—or alternatively state that leaving natural lands in their existing state sequesters carbon instead of emitting carbon. We suggest the following modifications:

Proposed Modification (SCS, Pg. 24)

By contrast, a pattern that places a greater share of new growth in dispersed standard development patterns consumes more greenfield land. *Additionally, converting greenfield and agricultural lands typically adds GHG and VMT to the region.*

We support the approach to this plan to avoid high hazard areas for wildland fires, sea level rise, flooding, etc. The less we build in those locations, the less we have to defend them and rebuild them in the future.

Within the “Promote a Green Region” (Pg. 27), “reducing consumption of resource areas, including agricultural areas” does not actually protect the land. The conservation mechanism is missing.

Proposed Policy Modification (SCS, Pg. 27)

“Protect ~~Reducing consumption of~~ resource areas, including agricultural land.”

This gets at the same intent (not converting it to urban uses), but actually takes the step forward of protecting it so the possibility of future potential conversions never has to happen again.

Page 29 covers the “Tools” that can be used to help with sustainable placemaking, specifically urban heat island reduction. This component easily benefits disadvantaged communities throughout the Southland and should be incorporated as a tool for the Environmental Justice Appendix. Inclusion of trees makes urban areas cooler, provides more shade for those on bike or foot, improves the sense of community, and cleans the air.

FHBP supports, in full, the absolute constraint (Pg. 32) that growth cannot or should not occur in existing open spaces or on conserved land. We would urge that easement lands and mitigation sites also get included in this list. As for the variable constraints, we agree with this list as well—especially the inclusion of wildland-urban interface and wildfire prone areas (Calfire Very High Fire Severity Zones).

Proposed Policy Modification (SCS, Pg. 32)

- Conserved *and easement* lands, *as well as mitigation sites*

On Page 33, the list of Data and GIS Maps referenced in this document are helpful. We’d offer the California Conservation Easement Database (CCED) as a future tool. It can be found at: <https://www.calands.org/cced/>.

Demographics and Growth Forecast Appendix

Within the Demographics and Growth Forecast Appendix, it states:

“Following public input and SCAG’s analysis of the GHG/VMT benefits of the alternative scenarios, a preferred growth forecast scenario was chosen which prioritizes

growth in areas such as job centers and transit priority areas which have regional transportation benefits. (see **EXHIBITS 1-9**.)”

Exhibits 1-9 appear in conflict with the description of the “absolute constraints.” For example, the absolute constraint of not building in existing open spaces or on conserved lands (as described in the SCS, Pg. 32) conflicts with the growth forecast areas. We recognize these growth forecasts were built using the transportation area zones (TAZ) and those zones that do not necessarily align with boundaries of conserved lands, but, these maps provide a false projection of growth in the region and within specific TAZs. The map should depict what is and is not an area of absolute constraint to align with what has been stated previously about where growth can and cannot occur.

Natural & Farmlands Appendix

Vision

FHBP supports the inclusion of natural and farmland preservation as a tool to reduce GHG and VMT. However, we are concerned that the goal of “Promote conservation of natural and agricultural lands and restoration of habitats” lacks the specific actions needed to actually conserve land. We suggest an action-oriented emphasis like “conserve” or “partner to conserve...” as follows:

Proposed Modification (N&FL Appendix, Pg. 2)

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

Proposed Modification (Plan, Pg. 9)

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

Further, FHBP just completed a yearlong study of restoration projects and their rate of success or failure. What we found was that most projects struggled to meet the mitigation measure requirements necessary under the California Environmental Quality Act (CEQA). In several instances (Pg. 2 & 11), the Appendix mentions removing non-native plants. Our study shows that this goal was part of the restoration project too, but the non-native seed bank was able to outcompete the native plants and dominate the landscape after the restoration. So, while improving habitats through removal of non-native plants is a commendable goal, it can be difficult for some to achieve without the proper site preparation, funding, experience, long-term stewardship, etc. Since restoration is a possible focus of this policy, we encourage SCAG to review the information and recommendations from our study. It can be accessed at: <https://www.fhbp.org/resources/studies-reports/ceqa-mitigation-study/>.

Policy & Regulatory Framework

As noted previously under Chapter 2 (the Plan), it is not prudent to rely on cities and counties (1) to protect our natural lands, or (2) to develop plans and policies to conserve them. Specific actions must be taken to ensure the preservation happens in perpetuity—acquisition and

ownership by a park/non-profit, a conservation or agricultural easement, or enrollment in a Conservation Plan.

Regional Conservation Approach

De-emphasizing growth in wetlands, wildlife corridors, and wildfire prone areas is a great step in identifying areas of regional importance. SCAG should consider supporting local, regional, and statewide efforts already underway in the conservation arena—especially where broad coalitions already exist. Along these lines, we suggest the following modification:

Proposed Modification (Plan, Pg. 9)

“To further prioritize natural habitat areas and avoid impacts to the environment, Connect SoCal will seek to deemphasize growth in wetlands, wildlife corridors, high-biodiversity areas, wildfire prone areas, and floodplains. *Aligning SCAG’s role and support with those of local, regional, and statewide conservation efforts is another opportunity.* This approach intends to focus regional growth in existing communities, and reflects various goals of the plan such as adapting to a changing climate and promoting conservation of agriculture and natural lands.”

For example, the Coast to Cleveland Connection focuses on connecting the 22,000+ acres of the Laguna Coast to the Santa Ana Mountains. Efforts are underway with the resource agencies, cities, transportation agencies, non-profits, and park managers to make this happen. When these partnerships are available, SCAG should support them.

Another example is the Hillside Open Space and Education Coalition, which, in 2004, united the cities of Brea, La Habra, La Habra Heights, and Whittier and the unincorporated communities of Hacienda Heights and Rowland Heights. The goal was to seek ways to preserve strategic hillside parcels in the Puente-Chino Hills and to mobilize public resources to preserve and acquire the parcels threatened by development. This Coalition is working with State Parks, local cities, residents, and non-profits. Again, this is another opportunity to support an existing effort—if and when the need arises.

Conservation Policies and Programs in the SCAG Region

We were pleased to see the addition of Agrihoods, the Liberty Canyon Wildlife Crossing, and Ventura County Habitat Connectivity and Wildlife Corridor Ordinance in the lineup of new activities being undertaken in the SCAG region.

For the Orange County Transportation *Authority* (not *Association* as listed on Pg. 14 of the N&FL Appendix), it may be helpful to provide context that the funding available in the Environmental Mitigation Program is five percent of the freeway revenues, which in 2005 dollars was \$243.5 million.

Proposed Modification (Plan, Pg. 9)

“Thirty million dollars for approximately 1,300 acres of land and \$10 million on 350 acres of habitat restoration have been funded through Measure M2. *The Measure provides five percent (\$243.5M in 2005 dollars) of the freeway revenues to fund this program.*”

On Page 16 the first paragraph indicates there are five adopted major conservation plans, but actually demonstrates in the text there are six. This should be corrected as follows:

Proposed Modification (N&FL Appendix, Pg. 16)

“Currently, there are ~~five~~ *six* adopted major conservation plans made up of multiple jurisdictions within SCAG’s boundaries (**EXHIBIT 5**).”

Within the OCTA Measure M2 NCCP/HCP, there have actually been 12 restoration projects funded. The addition of dam removal projects within the Cleveland National Forest were approved by OCTA’s Environmental Oversight Committee in May 2016 and the full OCTA board in February 2017.

Proposed Modification (N&FL Appendix, Pg. 16)

“Since the initial funding round in 2010, 1,300 acres of natural lands have been acquired and ~~eleven~~ *twelve* restoration projects have been funded.”

Exhibit 5 fails to include the Southern HCP in Orange County. Since the OCTA Plan overlays the entirety of both the Central-Coastal and Southern Plans, it may be helpful to have the OCTA plan displayed in a patterned texture on top of the other Orange County plans.

Opportunities

We are pleased to see the inclusion of an opportunities section within the Appendix (Pg. 18). However, we’d like to see this section expanded to more than just the Greenhouse Gas Reduction Fund (GGRF) Resources—there are many other tools, strategies, and techniques that can be utilized to conserve natural lands and simultaneously reduce GHG and VMT. Some other funding sources to conserve natural lands are listed in the Environmental Coalition letter to be submitted January 23, 2020.

Additionally, FHBP completed a study of innovative ways to link housing, transportation, and conservation through policies and funding mechanisms. This study is available for download at: <https://www.fhbp.org/resources/studies-reports/healthy-communities-toolkit/>.

The tools mentioned include items such as:

- Urban Growth Boundaries
- Crowdfunding
- Social Impact Bonds
- Real Estate Transfer Fees
- Community Benefit Fees
- Landfill Tipping Fees
- Differential Development Fees

We recommend extending past the GGRF as the only listed source to support the conservation of natural resources—as there are many others that currently exist at the local, regional, state, and federal level.

Recommended Policies

We have been a supporter of SCAG and its efforts to include natural land preservation in the RTP/SCS. However, we were disappointed to see that of the 10 policies recommended in the Natural and Farmlands Appendix all 10 policies were replicated word for word from the 2016 Appendix. It is as if no further thought into how the natural world has changed or where the locations of intense development pressure now exist. In the four years since the last plan, new policy recommendations could have been created and incorporated. New policies could be pulled from the list above described in the Opportunities section. We recognize that there may be an internal issue with adding “new” policies in an appendix that aren’t captured in the RTP or SCS itself. One solution to this is to rename the section “Strategies” because what is included in the list are actually implementation strategies for achieving a reduction in GHG and VMT using land conservation and restoration as a tool.

Next Steps

Of the five “Next Steps” described in the Appendix, three of them were from the 2016 plan. The only creative next step is the development of the regional greenprint, as SCAG is already engaging stakeholders via the Working Group. What we would have expected from the Next Steps section is a forward advancement of the 2016 activities. Our suggestions are below.

“Encourage Advance Mitigation Programs” could have forward motion by:

- Identifying infrastructure agencies about to adopt major programs/policies that could incorporate these advance mitigation programs.
- Working to retroactively adopt mitigation programs or policies within existing transportation measures.

“Align with Funding Opportunities and Pilot Programs” could have forward motion by:

- Assisting local agencies with tax increment financing measures that include conservation and parks as a key goal.
- Apply for state or federal conservation funding to complete projects of regional and/or statewide significance.
- Launch a pilot program that advances sustainable activities like water quality improvements, natural land acquisition, agricultural easement purchases, or restoration project implementation.
- Feature conservation funding in a Toolbox Tuesday for how local jurisdictions and/or non-profits can fund local projects.

“Provide Incentives for Jurisdictions to Work Across County Lines” could have forward motion by:

- Engaging with cross-jurisdictional conservation alliances to add support, value, and funding to the effort.
- Focus SCAG grants on conservation projects of regional significance as a tool for connecting habitat lands together cross-jurisdictionally.
- Identify locations where cross-jurisdictional alliances should exist and bring the parties together.

Thank you for the opportunity to comment the Connect SoCal documents. We hope our feedback is constructive and helps SCAG achieve its overarching goal of [REDACTED]

Sincerely,



Michael Wellborn
President

FRIENDS OF THE WHITTIER HILLS
[REDACTED]

January 21, 2020

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Friends of the Whittier Hills is now a part of this growing coalition in 2020.

Citizens created the Friends of Whittier Hills Association in 1984 after the successful Save Our Hills and Save Our Hills Again Referendums. We represent citizens of Whittier, La Habra Heights, Hacienda Height and other neighboring communities that are dedicated to education about the hills and continued protection of the habitat and the bio-diversity of its wildlife.

We offer the following comments on the Natural and Farmland policy, goals, and next steps.

Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long-term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The plan would be stronger if it supported the enhancement and/or protection of documented wildlife corridors *prior to commencing* impactful projects.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I can be reached at 626 622-6541. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [REDACTED]

Sincerely,
James B. Kelly Jr.
President
Friends of the Whittier Hills Association

FRIENDS OF THE WHITTIER HILLS
[REDACTED]

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Sincerely,
James B. Kelly Jr.
President
Friends of the Whittier Hills Association

JAN 2020

TO WHOM IT MAY CONCERN
 SUBJECT
 TRANSPORTATION IMPROVEMENT

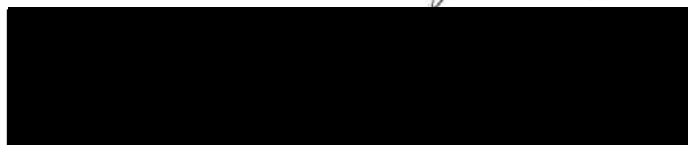
THE CHINO CHAMPIONS OF CHINO,
 CALIF. 91710 1-11-2020
 IT HAD A LIST OF PROJECTS
 THAT WAS BEING DONE

MAY I ADD ONE MORE TO YOUR LIST
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 WALNUT AVE AND MONTE VISTA AVE
 IN CHINO CA 91710
 THE TRAFFIC GETS HEAVY AFTER
 3 PM TO 6 PM

I HAVE LIVED AT MY ADDRESS
 12463 LEWIS AVE CHINO CA,
 FOR 48 YEARS

THANK YOU FOR YOUR
 ATTENTION

Garneth Wybenza



Since it appears the comment system is not working properly, please see attached for comments with proper line spacing.

Under the NextGen bus study, Los Angeles Metro is proposing eliminate almost all of its Rapid Bus routes, leaving only three (Wilshire, Vermont, and Van Nuys/Ventura/Sepulveda Pass). What implications will this have on FTIP and RTP/SCS conformity, given that signal synchronization and "rapid bus" improvements like shelters and signage were implemented on various corridors with federal funds? Metro is claiming to move to a "hybrid" bus system with stops spaced every quarter to half of a mile, which while making transit more competitive for short distance trips, will add 10-20% of commute time to the longer trips (8+ miles) which may make transit less competitive for those trips. To the extent that NextGen improves these corridors to provide BRT-like service at more stations than the previous Rapid Bus, this is a positive, but the impact of these changes will need to cycle through the technical working group and transportation modeling process.

It is important to note that Caltrans is requiring that agencies create a Local Road Safety Plan (LRSP) before getting any federal Highway Safety Improvement Program funding.
<https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/highway-safety-improvement-program/local-roadway-safety-plans> This can be fulfilled with a Vision Zero action plan or other plans. SCAG should assist jurisdictions in notifying them of this funding opportunity and support their applications for creating LRSP.

While I commend SCAG on having a comprehensive focus on safety, including separate sections for motorcyclists, bicyclists, commercial vehicles, aging people, and young people, there is no section on scooter safety. The increase in electric scooters is only going to grow. In addition to rental scooters, personal e-scooters are now extremely affordable, under \$150 at Walmart during the 2019 holiday season. There are concerns from some bicyclists about the use of 15-25 mph scooters on bike trails, while scooter riders are uncomfortable on arterials sharing roadways with SUVs and trucks.

I am pleased to hear that the State is "leading an initiative called the California Integrated Travel Project (Cal-ITP) to facilitate multimodal trip planning and payment to support state goals of increasing transit ridership, reaching environmental targets, lowering costs, creating efficiencies, improving customer experience and promoting equity. Current efforts focus on incentivizing statewide trip planning and fare payment standards and other integrated travel improvements over time." However, as in my past comments on previous cycles, SCAG also has a role in ensuring that state and federal funds are not wasted when multiple fare payment technologies are submitted for funding.

Currently, there is a disconnect in the region with the Inland Empire having a different 511 system from Los Angeles, Orange, and Ventura Counties, and in the 90's the regional SCAG carpool matching service was broken up and Balkanized into different counties. Today, multiple agencies use different apps for transit payment. SCAG can help facilitate differing agencies to come up with a standard that is used regionally for fare payment. This will also support transit ridership and greenhouse gas reduction goals.

The San Diego Association of Governments has taken on fare setting powers, partially because they recognize the feedback that sound fare policy has with providing sustainable and usable transit service. They are the lead agency on the COMPASS card and COMPASS Cloud, a single mobile fare payment system for all transit systems in the county. While SCAG may not wish to take on this role, they should at least ensure that Metrolink, Omnitrans, OCTA, and LA Metro have fare technologies that are compatible with each other, without kludges or passenger confusion.

Related to the comments on scooters, Wally Siembab at the South Bay COG has touted a "slow speed network" which could accommodate scooters, neighborhood electric vehicles, and other technologies. In Chapter 3 of the plan SCAG briefly mentions "neighborhood mobility areas" but this concept could be further developed. In particular, slow speed autonomous vehicles are likely to be much safer and provide a large benefit to the aging and disabled population, than being driven or driving in passenger cars. This concept can also have regional applications, such as with CV Link in the Coachella Valley connecting many cities in the area with an all weather, traffic free route.

SCAG's Technical Working Group has seen presentations regarding modeling for speculative technologies such as Uber Air. Any such service would have serious health, safety, and regulatory issues related to hundreds, if not thousands, of small aerial vehicles buzzing over our heads. It is important when SCAG staff and members hear these presentations to be mindful of all the challenges in implementation.

Is a real (i.e., after inflation) fare growth rate of 1.8% reasonable given declining farebox recovery ratios among all transit agencies, as recently studied in SCAG's own report on dropping ridership? Even if ridership stabilizes and grows, there will be pressure to hold nominal fares the same, since fare increases have been proven to cause declines in ridership.

Agencies nationwide have been looking into reducing fares for some groups, or overall. LA Metro's CEO is studying using congestion pricing as a full or partial replacement for current fare revenue, and their board recently passed exploring eliminating fares for all youth. The cost of fare collection, safety risk to drivers, and increasing dissatisfaction with the racially charged and possibly biased nature of enforcement all are leading to agencies to strongly consider not charging fares. Intercity Transit in Olympia, Washington recently found that NET fare revenue (fares minus the cost of collecting them, depositing them in the bank, printing fare media, etc.) accounted for less than 2% of its total revenue. Thus, going to a smart card or even an app for fare collection was not worth it.

<https://seattletransitblog.com/2020/01/01/intercity-transit-rolls-out-fare-freedom-and-schools-king-county-on-performance-metrics/>

Transit agencies need to seriously look at using NET fare revenue as their criteria when deciding to implement a new fare collection system, and determine if the increase in dwell time, enforcing fares, etc. are worth it.

Also, there are other taxes out there as well. The South Coast Air Quality Management District board has approved seeking legislative authority for an "air tax" to raise the sales tax for clean air improvements. What is SCAG's role in the air tax development? While speculative to include it is no more speculative than a TNC fee or local road charge, all of which would require 2/3 vote in the legislature.

Discuss in the document how the RTP/SCS will need to be amended to account for the changes made to general plans as a result of the RHNA allocation and the HCD determination. (It was made in a Technical Working Group presentation some time ago but should be in the RTP/SCS for the record.)

Overall, SCAG tried to dispel in the RHNA process how "local input" factored in to the RHNA distribution. But, for the RTP/SCS, it seems that SCAG is letting any project in, certainly in the strategic plan section. The FTIP and Financially Constrained Plans do have to have some financial backing, or documentation that it is funded, but please describe the level of oversight SCAG has in the projects in the list, or if it is just a "cut and paste" from the county transportation commissions once the modeling verifies that it will not exacerbate air quality conformity.

I think the telephone town hall was good, and SCAG should be commended on that. The number of community workshops on plan development provided land equity and coverage, but did not reach

people living in the urbanized core. They have meetings in Joshua Tree, Victorville, Palmdale, and El Centro.

Regarding ConnectSoCal meetings, the City of Los Angeles is 20% of the SCAG region. Yet there was exactly ONE meeting scheduled in the boundaries of the City of Los Angeles (Boyle Heights on May 30, 2019) posted on the list. One was later scheduled for June 6, 2019 at St. Annes Conference Center but it received no publicity from SCAG's Twitter - I was the only person to publicize it, after searching the list of meetings on the SCAG web site. <https://twitter.com/calwatch/status/1135797225055969286?s=20>

Los Angeles County has over half of the SCAG area's population yet only 27% of the workshops. There were no ConnectSoCal workshops in the San Fernando Valley (the closest ones were in Camarillo and Moorpark). The Arroyo Verdugo subregion also had no workshops. The only Saturday workshops were in Ventura and San Bernardino. The only opportunity for Westside, South Bay, and Gateway Cities residents to learn about Connect SoCal and ask questions about our region's SB 375 plan was to take time out of their workday, since those workshops were scheduled during the day.

None of the workshops in LA County (except Palmdale) were scheduled to run after 6 pm. How is someone supposed to attend and learn about this important planning document unless they leave work early? How does this meet the intent of SB 375 requirements of public consultation? This is unacceptable.

While the public hearings were scheduled in the evening and on weekends, the workshops are ways for the public to affect the plan before it is released. The number of public meetings in the future should better represent the proportion of residents in the region. A Saturday workshop must be held in a transit accessible location in central Los Angeles County, and evening workshops must be proportionally distributed by county population.

I also support the use of workshops as opposed to public hearing style, however the communication regarding workshops as drop in was not made clear on the flyer (it was later clarified on Twitter as "stop by any time").

In terms of transportation investments, Los Angeles County is doing most of the work regarding regional conformity and compliance with SB 32 greenhouse gas reduction requirements. Los Angeles is building transit through Measures M, R, A, and C; stormwater improvements through Measure W; bike lanes regionwide; and the City of Los Angeles is taking a greater share of housing construction than past years through the RHNA process. Meanwhile, Riverside and San Bernardino County are building more toll lanes and general purpose lanes, the Transportation Corridor Agency in Orange County is including widening of moderately used toll roads in the FTIP and Financially Constrained Project List, and OCTA is also moving through freeway widening. While some of these projects may reduce delay, increase travel speed, and reduce per vehicle emissions, they also increase VMT through induced travel and thus increase cumulative greenhouse gas and air pollution emissions. No TCA tollway has transit operating on it, and the Riverside and San Bernardino toll roads do not include transit facilities like direct access ramps, like in San Diego.

Under SB 32, it is required by law that we reduce our greenhouse gas emissions by 40% from 1990 levels by 2030, just ten short years from now. A greenhouse gas reduction of 40% is short of the 50% of greenhouse gas emission reductions that Stanford University has identified in order to meet the United Nations IPCC criteria, to avoid a 1.5 C (2.7 F) degree increase in global climate.

<https://earth.stanford.edu/news/roadmap-reducing-greenhouse-gas-emissions-50-percent-2030#gs.uglikb>

Why is Los Angeles County going to take on the vast majority of the greenhouse gas emission reduction responsibility when San Bernardino, Riverside, and Orange Counties are making transportation improvements that will place us in a situation where we are "three steps forward, two steps back"? As the author of the Sustainable Communities Strategy, SCAG has a role in vetting these projects. While they may not be able to overturn the will of the outer county voters for locally funded freeway expansion, they can certainly highlight the project impacts to the region not meeting its RTP/SCS goals and impacts to air quality conformity, and not include these projects on the FTIP for federal funding eligibility.

From an environmental justice perspective, workshop and meeting locations must reach low income, Latino, and Black communities. SCAG had workshops in Joshua Tree, Victorville, Palmdale, and El Centro, which are low income and have a greater percentage of Latinos and Blacks than most cities in the region. SCAG did outreach in the Coachella Valley, holding a special meeting with EJ groups in that area. SCAG should also be commended for its partnerships with groups like ActiveSGV and People for Mobility Justice, which reach youth and Latino, Asian, and Black communities.

However, more outreach should occur, particularly in heavily Latino areas like Southeast Los Angeles County which was neglected by SCAG in this cycle. SCAG should look at the demographics of the cities where meetings are and strive to hold workshops in areas that reflect the region's population.

Through use of the voter file and email addresses (which most voters now provide when they register to vote), combined with demographic information from polling firms and organizations such as Political Data, it is possible to send email polls or invitations to comment to underrepresented demographics such as Spanish speakers, Blacks, renters, youth, etc. <https://www.politicaldata.com/common-faqs/>

While this would only reflect citizens registered to vote, it would still provide an added dimension of information that could be used in the next cycle development to get more feedback from those who are only mildly engaged with their government.

In the 2016 RTP/SCS cycle, there was a controversy regarding SCAG releasing subjurisdictional growth forecast information to Climate Resolve. Climate Resolve claimed that elected officials on the SCAG board would "pull strings" on SCAG staff in order to get information to challenge Caltrans' analysis of the High Desert Corridor.

http://scag.granicus.com/MetaViewer.php?view_id=9&clip_id=998&meta_id=19923

SCAG created a "data distribution protocol" which required approval of jurisdictions in order to get subregional data. <http://www.scag.ca.gov/committees/CommitteeDocLibrary/twg091516fullagn.pdf>

I disagree with Climate Resolve and the signatories of the letter in the packet, which stated: "We recognize that some uses of data make agencies and other TWG members uncomfortable, but we also have to balance those concerns with the benefits of providing open access to data and information on our communities. Most of us are not engaged in political campaigns or using this data for nefarious purposes. In fact, many of us are 501(c)(3) organizations and expressly prohibited from engaging in political activities. Those of us in the nonprofit community are often on the outside of the planning process, and our real opportunity to influence the process comes on the back end when a plan is put out for review or a public workshop is conducted."

Furthermore, the groups contrasted themselves with "neighborhood associations" which want subjurisdictional (traffic analysis zone) data. I do not understand their concern. Are they afraid that local agency staffers will get bombarded with questions about what TAZs are?

Access to data is important for the public and interested parties to "fact check" SCAG's model and assumption, which became a point of contention in the RHNA process on "local input".

Please describe the current data distribution protocol, both at the jurisdictional and subjurisdictional level, and indicate the number and type of non-governmental requests which have been made since the protocol was adopted in 2016.

The intent of the use of the data should never be a criteria. For a public records request, whether the information is intended for political use, for a "hit piece" by the news media, for a gadfly to bring it up at a council meeting, or for a nonprofit interested in solving climate change, it doesn't matter. The law requires that the information be provided. If a favored nonprofit like Climate Resolve can get the data, then an adversarial nonprofit like Toll Free IE must also be able to get the data.

I recognize that subjurisdictional data is staff generated and likely has never been approved by electeds, which makes it sensitive. But if the purpose is to provide inputs to the SCAG RTP, then it should ONLY be used for that purpose and not be used by ANYONE to model anything outside of the strict parameters of RTP/SCS and related plans. This is technical data that is hard to understand, but any random member of the public should have access to it, provided they acknowledge the disclaimer on Page 27 of the appendix, "TAZ level data or any data at a geography smaller than the jurisdictional level has been utilized to conduct required modeling analyses and is therefore advisory only and non-binding, given that sub-jurisdictional forecasts are not adopted as part of Connect SoCal. TAZ level data may be used by jurisdictions in local planning as they deem appropriate. There is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with Connect SoCal."

If the modeling data SCAG generates at the subjurisdictional level is considered the jurisdiction's data, then SCAG and/or the jurisdictions must provide it equitably to all that ask for it, or else treat it as a draft work product, for internal use only.

Ideally, modeling data should be published on the SCAG open data web site, but as far as I can tell, even jurisdictional data is not available on the site (<http://gisdata-scag.opendata.arcgis.com/search?groupIds=57ba7b0e494f400ebd1abb89ccee201f>).

At a whole jurisdictional level, the minimum information should be provided, on SCAG's open data website, similar to the Climate Resolve request but at a jurisdictional level, which should be noncontroversial as it was derived through the local input process directly from jurisdictions.

From their request form:

Regional travel demand model files

- a. Jurisdiction (TAZ) layer – TransCAD or shapefile
- b. Household and jobs by jurisdiction Excel
 - i. baseline, all SCS scenarios modeled
- c. Network files – TransCAD
 - i. baseline, all SCS scenarios modeled
- d. Vehicle trip tables by time period – TransCAD
 - i. baseline, all SCS scenarios modeled
- e. Assigned traffic volumes by time period – TransCAD
 - i. baseline, all SCS scenarios modeled

Or will I have to sign a data protocol agreement for jurisdictional data too?

In 2016 RTP/SCS comments, I noted:

"MAP-21 calls for "reliability" as a measurement. In addition to traditional highway system reliability (i.e. travel time), transit reliability is important. Metrolink on time performance is dropping. LACMTA's on time performance goal for buses is 80% and is usually not met. Reliability is especially important for low wage workers who have shift-based schedules that require showing up on time to help customers or manufacture products. Poor reliability impacts people shifting trips to transit, since they perceive that a car trip is more

reliable, especially if transfers are involved. Policies such as dedicated bus lanes, smart cards, and off board fare payment can improve reliability."

SCAG notes in Connect SoCal, "Each transit agency must make its safety performance targets available to MPOs to assist in the planning process, and coordinate to the maximum extent practicable with the MPO in the selection of regional safety targets. The Final Rule will not take effect until after Connect SoCal is formally adopted. The 2024 RTP/SCS will be the first plan update to comply with this mandate.

While this is true, there are plenty of maps showing highway reliability improvements, but none on transit travel time. While transit reliability is a component of many factors, including labor availability, traffic congestion, state of good repair on rail, etc., it should be a goal of all transit systems to increase reliability. This means greater on time performance, reduced unscheduled maintenance, and proper labor availability to ensure all scheduled trips are covered. SCAG should, with input of local transit providers, set these goals for reliability, as that is an important factor for people to choose transit over driving on unmanaged, congested roadways. I suggest the use of on time performance, early trips (leaving one minute or more before scheduled departure time), miles between service calls, and percent of scheduled trips operated as criteria which could be gauged and compared between major operators in the region, and over time.

While there is a robust discussion of passenger rail and aviation in their respective sections, there is little discussion about the role intercity bus plays in reducing greenhouse gas emissions and as an alternative to planes and trains for medium distance travel. Southern California has a wide variety of intercity bus service, from longtime incumbents Greyhound and Megabus, to new entrants such as Flixbus, special intercity service such as the several companies operating between Las Vegas and Los Angeles or the Coachella Valley and Mexicali, and services tailored to ethnic groups like the Vietnamese operated service (Xe Do Hoang) from Orange County to the Bay Area, or El Paso-Los Angeles Limousine catering to Latinos in the I-10 market. In addition, recent legislation will open some Amtrak buses to regional traffic, and the San Joaquin JPA has recently obtained approval to pick up local passengers in the SCAG region along the Santa Barbara - Oxnard - Bakersfield and Bakersfield - Lancaster - Victorville routes.

A brief treatment should be included in Connect SoCal, and further expanded in future RTP/SCSs, ideally with the passenger rail section as it functions complementarily to it. Public transit is now also providing interregional connections. For instance, Kern Transit now operates several trips every weekday between Bakersfield and Santa Clarita, connecting that growing region with the LA Metro. Same with the newly expanded all day RTA CommuterLink from Escondido to Temecula, with express bus connections to San

Diego, Riverside and Corona; SunBus between Riverside and the Coachella Valley; and Coastal Express running seven days a week to Santa Barbara from Oxnard.

Transit agencies could do better to integrate their services with intercity bus much like they do intercity rail. Many companies like Greyhound are selling their stations, and local transit agencies should accommodate them, much like Megabus serves Union Station directly.

Cities should also not discourage casino buses from stopping in their communities, or using park and rides. These services are no different than vanpools, except they carry a less regular clientele. They reduce thousands of trips a day region wide and receive no government subsidy but are discriminated against by some cities, some because they have their own casinos, or others because of alleged passenger issues which could be handled (i.e. street parking, littering) without banning this valuable form of transit.

In the 2012 RTP/SCS, I had noted about considering making the truck only lanes “green lanes” for clean fuel and low emission trucks. This should be considered in any studies. Also, electrification of freight rail, while currently not funded in the short term, is a strategic long term improvement that should be strongly considered for implementation. This has the potential of eliminating a significant amount of emissions from diesel locomotives.

I am encouraged that SCAG has placed a more detailed discussion of the benefits and risks to freight rail electrification in the report. The report is informative in highlighting development of clean energy trucks and transport at the Ports of Los Angeles and Long Beach, but more clean trucks and trains are needed. Goods movement should also discuss AQMD's role in managing emissions at the port, and efforts made to reduce the use of dirty ship fuel when at or near port, which negatively affects nearby communities.

While Connect SoCal continues to include the East West Freight Corridor as a long term strategy, I believe that further study, the continued buildout of the ACE program in the San Gabriel Valley, and the lack of connectivity with the Metro Board approved I-710 corridor alignment (never mind the lack of funding) will determine that new truck lanes, on an elevated or tunnel structure, through built out areas are not feasible.

Historically, SCAG has felt more comfortable in a coordination and facilitation role. Recently, former SCAG President Alan Wapner said at a meeting that one of the values of SCAG is local input. While I appreciate that local input is important, simply compiling everyone's opinion may not be what is necessary to meet today's challenges of climate change, housing insecurity, and stagnant transportation safety. SCAG needs to take on a more robust role, lead rather than follow, and be bold, much like the former SCAG Executive Director is doing in his new position in San Diego at SANDAG.

There are simple ways where SCAG can make its voice heard regionally, to help improve our region's compliance with state and federal mandates. SCAG has facilitated in many cross-jurisdictional capital studies, like the West Santa Ana Branch, I-10 LA-SB Corridor, and Norwalk Green Line Extension studies.

But it could also look into operational coordination. For example, my parents live in Pomona, in Los Angeles County, and do not drive. Yet there is no single means of payment between Los Angeles, San Bernardino, and Orange Counties. They would have to have one fare card (the TAP card) and two apps (OCTA and Omnitrans) to pay without cash. Transfers are not accepted except at fixed locations, making short trips expensive even for seniors. Rather than ad hoc between agencies, facilitate studies between CTCs for operational concerns, because what happens there affects our region.

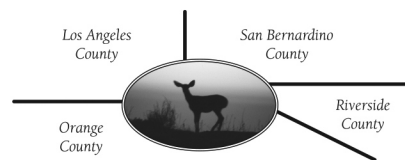
Similarly, Omnitrans (San Bernardino County's transit system) doesn't operate six days out of the year. Many low income workers have to work on days like Thanksgiving, New Years Day, and Memorial Day, and families who would like to go to a Labor Day picnic or Fourth of July fireworks are forced to find another ride or stay home. Some give up on transit and choose to buy a car, which results in greater pollution, greenhouse gas emissions, and congestion. This affects RTP/SCS goals and makes it harder to meet SB 375 targets. SCAG could use its pulpit to encourage agencies to adopt transit service standards regarding span of service and days of operation, and publicize those that don't. They could encourage Cal-ITP to come up with universal payment standards.

Regarding plan development, I agree with several Regional Council members that more robust discussion was needed on areas like transportation finance, high speed rail, and making transportation improvements correlate with housing growth.

Unfortunately, per the discussion at the November SCAG Regional Council meeting, there is a need to adopt this document quickly in order to maintain air quality conformity prior to the EPA deadline. I do hope that these changes can be incorporated, either in this draft, or in 2024 RTP/SCS development. Thank you for considering these comments.

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 22, 2020

Submitted through the Connect SoCal website:

<https://www.connectsocial.org/Pages/Connect-SoCal-Comment-System.aspx>

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

RE: Comments on the 2020 Draft Connect SoCal

Dear Connect SoCal Team:

Hills For Everyone (HFE) is an organization dedicated to the protection of the rare, unique, and disappearing landscapes of the Puente-Chino Hills Wildlife Corridor. We are writing to express our support for the natural and farmland policies included in the Draft Connect SoCal Plan.

By way of background, regional efforts to save the Puente-Chino Hills have been underway for more than four decades. Conservationists have been remarkably successful. In the western part of the Corridor, nearly 4,000 acres have been purchased mostly as mitigation lands. In the east, 14,000 acres have been set aside as Chino Hills State Park. The entire hillside system is now connected to the Cleveland National Forest at Coal Canyon under the 91 Freeway. The Corridor spans Los Angeles, Orange, Riverside, and San Bernardino Counties.

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). Since 2012, with release of the prior RTP/SCS, we've been part of the regional conservation coalition organized by Friends of Harbors, Beaches and Parks. Our collective goal was the inclusion of natural lands mitigation and policies within that SCAG plan.

As it relates to the Plan, we have comments on the following items:

Wildlife Corridors

Hills For Everyone partnered with California State Parks and numerous other entities to ensure permanent preservation of Coal Canyon Biological Corridor along the 91 Freeway. Without the Coal Canyon connection at the northern end of the Santa Ana Mountains, the entire Puente-Chino hillside system would have become "an island" and, over time, a steep decline in native species would have occurred due to a limited gene pool and loss of large predators. According to Drs. Reed Noss, Paul Beier, and Bill Shaw:

“Restoring a natural linkage in what is now a roaded underpass would set a global precedent. We are aware of no other restored biological corridor of this type and scale. Conservation-minded citizens throughout the world could look to Coal Canyon as an inspiring example of how an ecological error was corrected through thoughtful public action.”

This was a monumental effort, but our work is not done. Recent efforts to protect the Pechanga Corridor at the southern end of the Santa Ana Mountains is now at risk. Conservation groups and agencies are partnering to make this connection realized. Without this connection to the south, the top predator, the mountain lion, will become extinct in our area. Additional efforts are underway to protect the sub-species of mountain lion found in these and other local Southern California mountains. This is part of the reason why SCAG’s plan to de-emphasize growth in wildlife corridors (Appendix, Page 4) and policy to improve natural corridor connectivity (Appendix, Page 21) is so important to our region.

Significant Ecological Areas

Additionally, 3,000 acres of land in the unprotected middle of the Puente-Chino Hills Wildlife Corridor are an important connection needed to preserve the integrity of the 18,000 acres already protected. These 3,000 acres lie at the juncture of Orange and Los Angeles Counties. As noted in the draft Plan (Appendix, Page 14) Significant Ecological Areas (SEA) are a recently updated conservation strategy and policy in the region. Based on the Los Angeles County Board of Supervisors Resolution (from December 17, 2019), Conceptual SEAs have been eliminated as a category. As of January 16, 2020 (30 days after the ordinance was passed) the resolution is in full effect. This means all Conceptual SEAs are now simply considered adopted SEAs. See Item 3 under the Board of Supervisors Resolution from December 2019 (**Attachment 1**).

Further because the resolution is now implemented, Exhibit 4 on Page 15 of the Appendix is inaccurate. The two Conceptual SEAs are now SEAs and should be displayed as such.

Thank you for the opportunity to comment on this Plan. Should you have any questions, please reach out at [REDACTED]

Sincerely,

Claire Schlotterbeck

Claire Schlotterbeck
Executive Director

Attachment: 1 – Correspondence to LA County BOS re: SEA Modifications (12/17/19)



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL

[REDACTED]

MARY C. WICKHAM
County Counsel

December 17, 2019

TELEPHONE
[REDACTED]
FACSIMILE
[REDACTED]
TDD
[REDACTED]

Agenda No. 8
05/28/19

The Honorable Board of Supervisors 28 December 17, 2019
County of Los Angeles

[REDACTED]

**Re: SIGNIFICANT ECOLOGICAL AREAS PROGRAM UPDATE
PROJECT NO. 2017-003725-(1-5)
GENERAL PLAN AMENDMENT NO. RPPL2018003985
ADVANCE PLANNING NO. RPPL2017006228
ENVIRONMENTAL ASSESSMENT NO. RPPL2018004477
ALL SUPERVISORIAL DISTRICTS/THREE-VOTE MATTER**

Dear Supervisors:

Your Board previously held a duly-noticed public hearing on the above-referenced matter to consider the adoption of the Los Angeles County General Plan ("General Plan") amendment for the Conceptual Significant Ecological Areas ("SEA") update, amendment for the SEA Ordinance, and addendum to the Certified Final Environmental Impact Report ("EIR") for the General Plan Update Project 02-305 (collectively known as the "Project"). The Project is an update to the SEA Program in two components. The Conceptual SEA update is an amendment to the General Plan to make minor text and mapping changes that will designate Conceptual SEAs in Altadena, Rowland Heights, and Hacienda Heights as official SEAs and subject to the SEA Ordinance. The second Project component is the SEA Ordinance update. The SEA Ordinance update will fulfill Program C/NR-2 of the General Plan Implementation Program, which requires the SEA Ordinance update to implement the SEA Program in the General Plan. The SEA Ordinance update establishes permitting requirements, design standards, and review processes for development within SEAs.

The Honorable Board of Supervisors
December 17, 2019
Page 2

At the conclusion of the hearing, you indicated your intent to approve the Project and instructed our office to prepare the final ordinance and resolution for adoption, which are enclosed, along with the General Plan amendments.

Very truly yours,

MARY C. WICKHAM
County Counsel

By 
JILL M. JONES
Senior Deputy County Counsel
Property Division


APPROVED AND RELEASED:

THOMAS J. FAUGHNAN
Senior Assistant County Counsel

JJ:ss

Enclosures

c: Sachi A. Hamai, Chief Executive Officer
Celia A. Zavala, Executive Officer, Board of Supervisors
Amy Bodeck, Director of Regional Planning

RESOLUTION OF THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES
PROJECT NO. 2017-003725-(1-5)
ADVANCE PLANNING NO. RPPL2017006228
GENERAL PLAN AMENDMENT NO. RPPL2018003985
ENVIRONMENTAL ASSESSMENT NO. RPPL2018004477

WHEREAS, Article 6 of Chapter 3 of Division 1 of Title 7 of the Government Code of the State of California (commencing with section 65350) authorizes the County of Los Angeles ("County") to adopt amendments to its General Plan and elements thereof;

WHEREAS, Article 1 of Chapter 4 of Division 1 of Title 7 of the Government Code of the State of California (commencing with section 65800) and Chapter 22.232 of the Los Angeles County Code ("County Code") authorizes the County to adopt amendments to Title 22 of the County Code;

WHEREAS, the County Board of Supervisors ("Board") conducted a duly-noticed public hearing on May 28, 2019 to consider Project No. 2017-003725-(1-5) which includes amendments to the General Plan and County Code related to the Significant Ecological Areas ("SEA") Program update ("Project"); and

WHEREAS, the Board finds as follows:

1. The SEA Ordinance implements the goals and policies of the General Plan by establishing permitting requirements, design standards, and review processes for development within SEAs.
2. The SEA Ordinance is a County-wide ordinance that will apply to all areas mapped as SEAs within the General Plan SEAs and Coastal Resource Areas Policy Map (Figure 9.3), except for the Santa Monica Mountains SEA and Santa Catalina Island Coastal Resource Area ("CRA"). The Santa Monica Mountains SEA will be subject to the SEA ordinance in effect prior to the effective date of this SEA Ordinance update ("prior SEA Ordinance") until the Santa Monica Mountains North Area Community Standards District ("SMMNA CSD") is amended. The regulations in the SMMNA CSD will be more restrictive than the regulations proposed in this SEA Ordinance update. The Santa Catalina Island CRA will also be subject to the prior SEA Ordinance, until such time as the CRA is amended.
3. The Conceptual SEA update is an amendment to the General Plan to make minor text changes and mapping changes to make the Conceptual SEAs become full SEAs and subject to the SEA Ordinance update. During the General Plan adoption process, the Board designated certain proposed expanded SEAs as "Conceptual SEAs," pending further review for compatibility with community plans in Altadena, Rowland Heights, and Hacienda Heights. As part of the SEA Ordinance update and the East San Gabriel Valley Area Plan outreach, the County Department of Regional Planning ("Department") heard from many

constituents in the area who believed that the Conceptual SEAs should be officially adopted as a part of the SEA Ordinance update process.

4. The SEAs categorized as "Conceptual" amended per General Plan Amendment No. RPPL2018003985 are located in the communities of Altadena ("Altadena Foothills and Arroyos SEA"), and Hacienda Heights and Rowland Heights ("Puente Hills SEA").
5. The SEA Ordinance update proposes changes to the permitting and review processes, establishes new design and development standards, requires mandatory open space preservation, and enforces unpermitted activities in the SEAs. These include:

Development Standards and Thresholds

Standard industry-recognized concepts were used to create development standards for addressing identified SEA resources, SEA protected trees, water resources, and specific land uses. The development standards for the SEA resources have maximum thresholds of disturbances allowed for each SEA resource category. Development that meets these requirements will receive a streamlined ministerial SEA review. Development unable to meet the development standards will require a SEA Conditional Use Permit ("SEA CUP") process similar to the prior SEA Ordinance's CUP process.

Preliminary Biological Review

In the SEA Ordinance update, prospective applicants will be asked to identify existing SEA resources on-site in a Biological Constraints Map ("BCM") at the beginning of the design phase, prior to application submittal. Applicants must attend a SEA counseling meeting to receive guidance from staff on how the conceptual project design can avoid and minimize impacts to SEA resources.

Streamlined Review Process

The SEA counseling meeting paves a path for a streamlined review process. Although surveying and drafting a BCM will require an investment in time and resources early in the design process, it will result in better sited and designed projects to accommodate the biological constraints of the property. In the SEA Ordinance update, a ministerial SEA review will be processed as a biological review in conjunction with the appropriate land use permit. A staff biologist will conduct the biological review. Projects qualifying for a ministerial SEA review will not have to submit additional biological studies or documentation, nor be reviewed by the SEA Technical Advisory Committee ("SEATAC").

Natural Open Space Preservation

Both ministerial SEA reviews and SEA CUPs will be required to provide natural open space preservation. The ratios for open space preservation are based on the amount and type of SEA resources disturbed.

SEA Protected Trees

The SEA Protected Trees development standard and Protected Tree Permit were developed to better assess impacts on native trees in the SEAs. Mitigation ratios were developed for the Protected Tree Permit.

Enforcement

Any activity defined as development in the SEAs, undertaken prior to an approved permit, is prohibited. A Ministerial SEA Review or SEA CUP shall be obtained to assess the impacts of the unpermitted development and require necessary mitigations. If neither permit is obtained, a Restoration Permit shall be required to restore the disturbed area to a close resemblance of its original natural habitat.

6. The SEA Ordinance and Conceptual SEA updates work toward achieving General Plan Goal C/NR 3. The SEA Ordinance update is more protective of the natural habitats that comprise the SEAs. The SEA Ordinance update requires preliminary assessment of biological resources to guide sustainable development and provides for permanent preservation of sensitive habitats. The adoption of the Conceptual SEAs, as part of the SEA policy map, will ensure additional protections for those areas.
7. The SEA Ordinance update component of the Project qualifies for a Categorical Exemption (Class 8 Exemption, Actions by Regulatory Agencies for Protection of the Environment) under the California Environmental Quality Act (Pub. Resources Code § 21000 et seq.) ("CEQA"), the State CEQA Guidelines (Cal. Code Regs., Tit. 14, § 15000 et seq.) ("State CEQA Guidelines"), and the Environmental Document Reporting Procedures and Guidelines for the County. The SEA Ordinance update will reduce the environmental impacts to SEAs through the streamlined review process and development standards by guiding ground and vegetation disturbance to avoid or minimize impacts to the SEAs. The use of the development standards limits the development footprint, maintains wildlife movement corridors, and requires setbacks from SEA resources. The requirement of natural open space preservation enables permanent protection within the SEAs.
8. An Addendum to the Certified Final Environmental Impact Report ("EIR") for the General Plan Update, adopted on October 6, 2015, was prepared for the Conceptual SEAs update component of this Project in compliance with CEQA requirements. The Addendum was not required to be circulated for public review per Public Resources Code section 15164. Any impacts that could be associated with the proposed amendments to the General Plan were previously analyzed within the Final Programmatic EIR ("General Plan EIR"). The General Plan EIR fully analyzed the areas categorized as Conceptual SEAs, as part of the proposed Altadena Foothills and Arroyos, and Puente Hills SEAs. The General Plan EIR did not make any specific mention of Conceptual SEAs. A Modified Environmental Checklist Form (Initial Study) was not created for this

project because there are no potential project impacts that would require revisions to the General Plan EIR.

9. The County departments of Public Works, Public Health, Parks and Recreation, and Fire were consulted during the development of these updates. Comments and recommendations about review procedures for County projects were received from County departments and were incorporated into the Public Hearing Draft of the SEA Ordinance update and Implementation Guide.
10. On October 8, 2014, the County Regional Planning Commission ("Commission") conducted a continued public hearing for the General Plan 2035 Update. The SEA Program update was a part of the General Plan update, which included updated boundaries, policies, and an updated ordinance. Staff recommended that the SEA Ordinance update be taken off calendar to allow additional time to address stakeholders' concerns regarding the SEA Ordinance update, and to allow for more comprehensive community-level outreach; the remaining pieces of the SEA Program update progressed with the General Plan 2035 update. Thirteen individuals testified at the hearing. The majority opposed the expansion of SEAs on mining properties, agricultural areas, and Economic Opportunity Areas proposed in the Antelope Valley Area Plan Update, and expressed concerns over the implementation of the SEA Ordinance update. One individual spoke in support of the SEA Program, with recommendations to change the SEA Ordinance update. Three individuals inquired about zoning consistency and the impact on a specific property in Kinneloa Mesa.
11. On December 10, 2014, the Commission conducted a continued public hearing for the General Plan update. The Commission considered the General Plan update in its entirety and the Final EIR, closed the public hearing, and recommended the EIR and General Plan update to the Board for approval. Seven individuals testified at the hearing on various topics. Regarding SEAs, one individual expressed concerns over not having been notified of the changes to the SEA Program. Another individual commented on the importance of maintaining the proposed SEAs, and suggested that some large sites in the East San Gabriel Valley be designated Rural Land 40 (RL 40) to prevent parcel fragmentation. The Commission expressed concerns over the proposed SEAs in existing community plan areas. Before closing the public hearing related to SEAs, the Commission directed staff to designate proposed expanded SEAs within the communities of Altadena, Hacienda Heights, and Rowland Heights as "Conceptual SEAs," and add language to clarify that the Conceptual SEAs be further considered and effective upon the preparation of community-based planning efforts. It was noted that the existing adopted SEA boundaries within these areas will remain in place and will not be affected by the designation of proposed expanded SEAs as Conceptual SEAs.
12. On May 17, 2017, the Commission conducted a duly-noticed public hearing where staff presented on the history of the SEA Program and the latest updates to the SEA Ordinance. The Commission heard and continued the hearing to provide additional time for public review and comment and for staff to further

refine the draft language to be consistent with the technical update to Title 22 of the County Code. The Commission continued the public hearing to July 12, 2017, and requested that staff return with a document responding to the comment letters received.

13. On July 12, 2017, the Commission conducted a continued public hearing. The Commission requested further clarification on portions of the SEA Ordinance update. The Commission also had questions on the relationship between the SEA Ordinance and the then-pending Accessory Dwelling Units Ordinance. The Commission requested information on the number of permits processed, the draft Implementation Guide, and the overall intent and purpose of the SEA Ordinance update. The Commission also directed staff to conduct additional outreach, given that only one person wanted to provide testimony.
14. On November 8, 2017, the Commission conducted a continued public hearing. Staff provided additional information in response to questions and comments raised by the Commission at the July 12, 2017 public hearing. Staff also introduced an alternative approach for the SEA Ordinance update that would incorporate an early biological review to streamline the process and help design projects that avoid or minimize impacts. Staff requested that the SEA Ordinance update be taken off calendar to allow staff to revise the ordinance, complete the SEA Implementation Guide, allow the Santa Monica Mountains North Area Plan effort to proceed separately in developing more specific policies and standards for the Santa Monica Mountains SEA, based on habitat mapping, and allow for further outreach. The Commission took the matter off calendar.
15. On March 14, 2018, Staff presented an update on the SEA Ordinance to the Commission as a discussion item. Staff presented the public review draft of the SEA Ordinance update and Implementation Guide, and notified the Commission of the start of a 75-day public review period.
16. The Department conducted a robust public engagement campaign during the period from March to September 2018. The objectives of the engagement efforts were to provide general understanding of the SEA Program, discuss the SEA Ordinance update, and answer any specific questions from members of the public about the SEA Ordinance update.
17. On September 26, 2018, the Commission conducted a duly-noticed public hearing on the SEA Ordinance update and Implementation Guide. Staff introduced the Conceptual SEA update. Staff recommended that the Conceptual SEAs in the communities of Altadena, Rowland Heights, and Hacienda Heights be adopted as official SEAs. Staff reported that the recommendation was a result of constituents in those communities requesting that the conceptual SEAs become official SEAs. Nine members of the public testified. Several concerns voiced were the single-family residence exemptions for the Antelope Valley, how the SEA Ordinance update would affect existing water hauling businesses or CUPs, the SEA Ordinance update's application to already-submitted applications, and notifications of approved ministerial SEA reviews. The Commission

requested clarification on the definition of heritage trees, performance standards for mitigation trees, and cost estimates for additional County Foresters to properly implement the ordinance. Additional requests from the Commission included addressing public concerns with exempting single-family residences and disturbed farmland in the Antelope Valley, and adding a finding for SEA CUPs that would require siting of development in the least-sensitive location. The Commission continued the matter off calendar to allow staff to make the requested changes and address issues raised by the Commission and members of the public.

18. On February 27, 2019, the Commission conducted a duly-noticed public hearing on the SEA Ordinance and Conceptual SEA updates. Staff presented the changes and clarifications requested by the Commission on heritage trees, performance standards for mitigation trees, and cost estimates for additional staffing. Staff updated the Commission on meetings held with the public to further discuss concerns, such as exemptions for single-family residences in the Antelope Valley and CUP renewals. Seven members of the public testified. The testimonies included support for the Conceptual SEA update, support for and opposition to the Antelope Valley exemptions, and concerns regarding the open space preservation ratios. After hearing all testimony, the Commission closed the public hearing and recommended that the Board approve the SEA Program update.
19. Members of the public had four opportunities to comment on the draft SEA Ordinance since the project was separated from the General Plan Update. The first comment period for draft Nos. 7, 8, and 9 occurred during the May 17 and July 12, 2017 Commission public hearings. The second comment period for the Public Review Draft was from March 14 to May 31, 2018. The comments received included the Antelope Valley exemptions, protection of Conceptual SEAs, and applicability of the SEA Ordinance update. The third comment period for the public hearing draft was from August 27, 2018 to September 26, 2018. The fourth comment period for the public hearing draft was from January 28, 2019 to February 27, 2019.
20. Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the public hearing notice was published in the Los Angeles Daily News, Antelope Valley Press, and La Opinión.
21. Project information was made available to the public online and at nine County public libraries in the communities of East Los Angeles, Florence-Firestone, Topanga Canyon, Hacienda Heights, Rowland Heights, Altadena, Acton, Lake Los Angeles, and Lancaster. Project information and public hearing notice were also emailed to the those who subscribe to the SEA courtesy email list. Additional social media and blog posts have been posted weekly with links to project information.
22. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at

the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Environmental Planning and Sustainability section of the Department.

THEREFORE, BE IT RESOLVED THAT the Board:

1. Finds that the Addendum to the Certified Final EIR for the County General Plan Update Project 02-305 has been prepared in compliance with California Environmental Quality Act (Pub. Resources Code § 21000 et seq.), the State CEQA Guidelines (Cal. Code Regs., Tit. 14, § 15000 et seq.), and the Environmental Document Reporting Procedures and Guidelines for the County, and reflect the independent judgement of the Board;
2. Adopts the Conceptual SEAs update, General Plan Amendment No. RPPL2018003985, an amendment to the General Plan which designates the Altadena Foothills and Arroyos and the Puente Hills Conceptual SEAs as official SEAs and subject to the regulations of the SEA Ordinance update; and
3. Adopts the SEA Ordinance update, Advance Planning No. RPPL2017006228, containing the proposed amendments to Title 22 of the County Code, and determines that the amendments are compatible with and supportive of the goals and policies of the General Plan.

The foregoing resolution was on the 17th day of DECEMBER 2019, adopted by the Board and ex officio the governing body of all other special assessment and taxing districts, agencies, and authorities for which said Board so acts.



CELIA ZAVALA, Executive Officer of the Board of Supervisors of the County of Los Angeles

By [Signature]
Deputy

APPROVED AS TO FORM:

MARY C. WICKHAM
County Counsel

By [Signature]
Jill M. Jones
Senior Deputy County Counsel
Property Division

GENERAL PLAN AMENDMENT

SEA changes highlighted in Green.

Page 39: East San Gabriel Valley Planning Area - Planning Area Issues

Page 60: West San Gabriel Valley Planning Area – Planning Area Issues

Page 134: Figure 9.3 SEA and CRA Policy Map – remove footnote No. 1

Page 134: Footnote – remove footnote

Page 256: General Plan Implementation Program

Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map

Remove Conceptual SEAs category from legend and categorize all Conceptual SEAs as SEAs.

Total	234,251	100%
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Ethnicity	Unincorporated Area Population	Percentage
Hispanic or Latino	136,104	58%
Not Hispanic or Latino	98,147	42%
Total	234,251	100%

Source: 2010 U.S. Census

Geography

The Planning Area's geography is characterized by valleys and rolling, dry hills. The San Gabriel River runs along the Interstate-605 and the western boundary of the Planning Area. The Puente Hills form the southern border for the Planning Area, and include natural areas and recreational opportunities for the region. The northern portion of the Planning Area is characterized by the steep upgrade and urban-wildland interface with the Angeles National Forest and San Gabriel Mountains.

Transportation Infrastructure

The Planning Area is served by Interstate-10, Interstate/State Route-210 and State Route-60, which provide east-west access and the Interstate-605 and State Route-57, which provide north-south access. The Planning Area is also served by the Metrolink commuter rail Riverside and San Bernardino lines, and Foothill Transit local and regional bus services.

Planning Area Issues

The primary constraints in the Planning Area are a growing shortage of large blocks of developable land and worsening traffic congestion. Many of the traditional suburbs within the Planning Area are maturing and facing infrastructure capacity issues and limited mobility options. Specifically, solid waste and sewerage disposal are concerns. In addition, portions of the City of Diamond Bar, City of Pomona, City of San Dimas, City of Walnut, and the unincorporated areas are on septic systems, which are subject to failure and potential groundwater contamination if not properly maintained. Transportation improvements will be critical for the long-term economic health of the Planning Area. Traffic on the major east-west freeways, including the Interstate-10, Interstate-210 and State Route-60, is heavily congested during peak hours, with commuters generally traveling west in the morning for work and east in the evening to return home.

The Planning Area also includes environmental and hazard constraints. The Puente Hills, which include portions of Rowland Heights and Hacienda Heights, contain fault traces and wildfire threats. Wildfires and landslides also pose safety hazards in the foothill communities. In addition, the Planning Area contains SEAs ~~including Conceptual SEAs in Hacienda Heights and Rowland Heights.~~

Opportunity Areas

Figure 5.16: Opportunity Area Map—Avocado Heights

Total	122,834	100%
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Ethnicity	Unincorporated Area Population	Percentage
Hispanic or Latino	36,762	30%
Not Hispanic or Latino	86,072	70%
Total	122,834	100%

Source: 2010 U.S. Census

Geography

The Planning Area includes the San Gabriel Mountains and Angeles National Forest, and provides a large range of open space and recreational opportunities for area residents. The San Gabriel River flows north-south along the Planning Area's eastern border and Interstate-605. The Planning Area is almost entirely developed with historically suburban developments.

Transportation Infrastructure

Two major east-west freeways, Interstate-10 and Interstate/State Route-210, run through the Planning Area. In addition, the Metro Gold Line traverses the City of Pasadena and terminates adjacent to unincorporated East Pasadena-East San Gabriel. Metro has also approved the expansion of the Gold Line light rail to several communities in the Planning Area. Other available transit options include Foothill Transit, which operates multiple bus lines throughout the Planning Area. The El Monte Airport is also located in the Planning Area.

Planning Area Issues

The Planning Area is comprised of mature, suburban communities, including some in the foothills of the San Gabriel Mountains. Some of these communities contain environmental resources and others face hazardous constraints. Portions of the Altadena Foothills and Arroyos SEA, San Gabriel Canyon SEA, and Puente Hills SEA cover the Planning Area. **The community of Altadena includes Conceptual SEAs.** In addition, many of the foothill communities are designated Very High Fire Hazard Severity Zones, which reflects the increased threat of wildfires and subsequent mudslides within those areas.

Many of the unincorporated areas are isolated islands of almost entirely residential development. It is important to integrate these islands into the fabric of their surrounding communities, where many of the services and daily needs of the unincorporated residents are met.

Opportunity Areas

Figure 5.41: Opportunity Area Map—Altadena

Located in the heart of Altadena, Lake Avenue, between Altadena Drive and New York Drive, as shown in Figure 5.41, is a commercial corridor with various community-serving businesses, such as retail commercial, restaurants, services, and small professional offices.

Figure 5.42: Opportunity Area Map—East Pasadena-East San Gabriel

Mountains and the entirety of Santa Catalina Island are regulated through their individual local coastal programs.

The objective of the SEA Program is to conserve genetic and physical diversity by designating biological resource areas that are capable of sustaining themselves into the future. However, SEAs are not wilderness preserves. Much of the land in SEAs is privately-held, used for public recreation, or abuts developed areas. The SEA Program must therefore balance the overall objective of resource preservation against other critical public needs. The General Plan goals and policies are intended to ensure that privately-held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the long-term survival of the SEAs.

Certain uses of the SEAs are compatible by definition with the long-term sustainability of biological resources. Some examples of uses that do not conflict with the goals of the SEA Program include: regulated scientific study; passive recreation, including wildlife observation and photography; and limited picnicking, riding, hiking and overnight camping. Many other uses may also be compatible with the SEA Program, or may partially or fully mitigate against potential impacts through careful site design and stewardship. In particular, the following uses may be determined compatible by scientific review or biotic surveys, or through the addition of conditions that are intended to protect against site specific and cumulative impacts to biotic resources in the SEA:

- Low-density or clustered residential uses that are compatible with identified biotic resources present in or affected by the site.
- Low-intensity local or visitor-serving commercial uses.
- Essential public and semi-public uses that are necessary for health, safety and welfare, and that cannot be relocated to alternative sites.
- Agricultural uses that are compatible with identified biotic resources that are present on or near the site.
- Extractive uses, including oil and gas recovery, and rock, sand and gravel quarrying, which are compatible with identified biotic resources.

More complex or intensive types of developments within SEAs are not precluded from development, but may require additional technical review to ensure that projects properly identify existing resources and potential impacts. The Los Angeles County Department of Regional Planning (DRP) assumes a responsibility to assist these types of projects with site design in the early stages of the project to ensure that projects are sensitive to and compatible with the resources of the area. The process of analyzing impacts to existing biological resources and determining SEA compatibility is designed to

³-Conceptual SEAs are depicted to show proposed SEA Map updates based on the criteria for SEA designation established by the General Plan. Conceptual SEAs are to be considered and effective only through the preparation and adoption of community-based plans.

Program No.	Program Description	General Plan Goals and Policies	Lead and Partner Agencies	Timeframe
LU-1	<p>Planning Areas Framework Program</p> <p>The General Plan serves as the foundation for all community-based plans, such as area plans, community plans, and coastal land use plans. Area plans focus on land use and other policy issues that are specific to the Planning Area. The Planning Areas Framework Program shall entail the completion of an area plan for each of the 11 Planning Areas.</p> <p>Area plans will be tailored toward the unique geographic, demographic, and social diversity of each Planning Area; however, at a minimum, area plans shall be developed using the following guidelines:</p> <ul style="list-style-type: none"> • Involve major stakeholders, including but not limited to residents, businesses, property owners, County departments, regional agencies, and adjacent cities. • Explore the role of arts and culture, and consider beautification efforts. • Analyze the transportation network, and assess the transportation and community improvement needs. Utilize the street design considerations outlined in the Mobility Element as a tool for street improvements that meet the needs of all potential users, promote active transportation, and address the unique characteristics of the Planning Area. • Review and consider the identified opportunity areas and Conceptual SEAs, as applicable. • Develop a land use policy map that considers the local context, existing neighborhood character, and the General Plan Hazard, Environmental and Resource Constraints Map. • Consider the concurrent development of areawide zoning tools. • Update specific plans and zoning ordinances, as needed, to ensure consistency and plan implementation. <p>At a minimum, each area plan shall consist of the following components: 1) a comprehensive policy document with area-specific elements, as needed, that incorporates community-based plans as chapters; 2) a land use policy map that utilizes the General Plan Land Use Legend; 3) a zoning map that is consistent with the area plan; 4) a capital improvement plan</p>	Land Use Element: Goal LU 2	<p>Lead: DRP</p> <p>Partners: DPW, CEO, DPH, CDC, DPR, Arts Commission, Fire</p>	Years 1-2



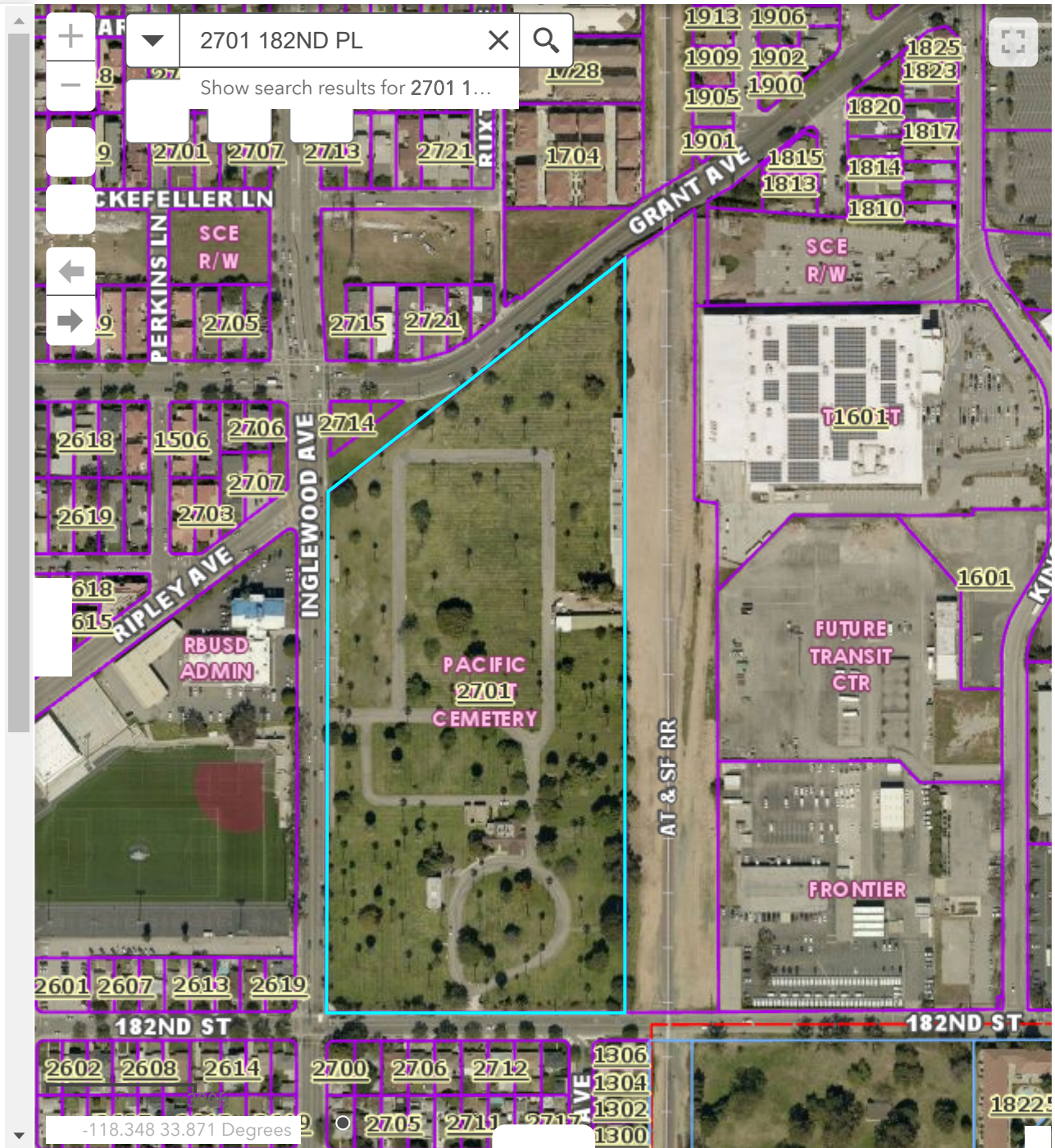
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2701 182ND ST
APN:4082020033
[Google Street View](#)

Lowest APN	4082020033
APN	4082020033
Land Use	Institutional
General Plan	R-1
Zoning	R-1
Condo	
Units	0
Landmark	
Assessor Area	16.93 ac
Redondo Parcel	Yes
Status	Active
Situs Address	2701 182ND ST
Situs City-State-Zip	REDONDO BEACH CA 90278
Mailing Address	2701 182ND ST
Mailing City-State-Zip	REDONDO BEACH CA 90278
1st Owner Name	PACIFIC CREST CEMETERY CO INC
1st Owner Overflow	
Special Name Legend	
Special Name Assee	
2nd Owner Assee	
Legal Desc 1	MR 15-21-22 3.74 ACSUNSOLD POR OF 16.94
Legal Desc 2	MORE OR LESS ACS POR OF LOT 7





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

January 24, 2020

RE: Draft Connect SoCal Plan Comments

To whom it may concern:

Thank you for the opportunity to provide comments on the Draft 2020 RTP/SCS, or Connect SoCal (Draft Plan). Leadership Counsel has worked in the Eastern Coachella Valley (ECV) for over six years, advocating at the local, regional, state, and federal levels on the overlapping issues of land use, transportation, climate change, safe and affordable drinking water, affordable housing, government accountability, and equitable investment in disadvantaged communities. We seek to advance environmental justice in some of the most vulnerable communities in California and we do so in partnership with frontline communities and community residents.

Southern California is home to a diverse geographic landscape with a population just as diverse. It's a region with immense opportunity and unique challenges. Planning, therefore, is an integral tool to ensuring a just and thriving region for all people. Through our comments, we seek to strengthen Connect SoCal's policies to create sustainable, equitable, and effective transportation that directly benefit all of SCAG's residents, regardless of race, socioeconomic status, language, or place. At the forefront of such a plan, SCAG must acknowledge the distinct issues faced in different parts of the region and assess the specific solutions needed to solve them. In our letter, we hope to provide such insight on rural, agricultural, and unincorporated communities that most face hardship with transportation, housing, and the impacts of climate change. This letter also provides specific insight on the particular issues faced in the Eastern Coachella Valley (ECV) in Riverside County.

Our comments to the Draft are informed and motivated by our work directly with low-income communities and communities of color in the ECV. Leadership Counsel works to ensure that the ECV receives the benefits of equitable investment and healthy development in order to enjoy healthy and safe places to live. Our direct partnership with community residents helps inform our approach with regional transportation planning. We have thus worked to elevate the prominent issues in the ECV with respect to mobility, safety, connectivity, access, and overall infrastructure

deficiencies that can be seen throughout different unincorporated, rural, agricultural, and low-income communities and communities of color.

We commend the staff for their continued engagement and efforts to connect with community-based and non-profit organizations, particularly in disadvantaged communities. We look forward to continued collaboration with staff and partners to ensure that Connect SoCal includes a comprehensive and equitable set of policies to address transportation, sustainability, and housing across the region.

Below is a list of recommendations captured by category that will help improve and strengthen the vision of Connect SoCal 2020:

Community Outreach and Engagement

Strategy recommendations:

- a. **Include stronger practices for meaningful community outreach and engagement.** We appreciate the level of engagement that staff conducted with community-based and nonprofit organizations working with environmental justice communities. These efforts should continue and can be improved upon with more direct partnerships. Organizations working on the ground are capable of having much more capacity by working together, especially if they work within the same region. Helping organizations build capacity and cross-sector collaborations can help advance the work much further. SCAG can help advance this by working with organizations and encouraging partnered outreach efforts to better reach community residents. This has worked with us in the ECV and we've been able to build our relationships with partners and align our efforts between organizations for one united cause.

Overall, SCAG is encouraged to rely on the support and guidance of community-based and non-profit organizations, but should still employ their responsibility as the region's Metropolitan Planning Organization to lead an effective and meaningful community engagement process. This includes conducting public community workshops and meetings that provide background information, full context, public comment and design opportunities, as well as follow-up opportunities with residents to maintain engagement throughout the entirety of the planning process.

In addition, these policies and practices should be outlined in the Draft for jurisdictions and planners to follow as they work to implement the vision of Connect SoCal through a community driven process.

- a. **Reinforce the importance of inter-agency and cross-sector collaboration to better facilitate project development, funding, implementation, and operations and maintenance.** To better support the community and Connect SoCal’s vision, there needs to be stronger collaboration and overall communication practices between the different agencies responsible for executing projects. It is equally important to integrate these efforts within the community engagement process to ensure that residents are a part of the conversation every step of the way.

Environmental Justice and Public Health

We appreciate that environmental justice is being increasingly acknowledged by SCAG in this years update as playing a vital role in all sectors of planning, as has long been advocated by environmental justice communities and organizations.

We are glad to see that an environmental justice toolkit has been developed and included in the Draft and that it draws from additional resources like the California Environmental Justice Alliance SB 1000 toolkit which was developed with the expertise of several environmental justice leaders from across the state.

Strategy recommendations:

- a. **Ensure a better understanding and inclusion of the serious needs and deficiencies of rural and unincorporated communities in the Draft.** Rural communities provide a unique landscape for planning and development. Given SCAG’s vast geography and growing needs in more densely populated areas, rural communities and subregions tend to see less investment and prioritization. Nonetheless, such communities, like those located more inland, play an important role in the character and economy of SCAG and the State of California.

It is incredibly important to understand the unique challenges faced in rural communities, especially ones in unincorporated and environmental justice areas. As such, unique solutions are necessary to ensure that communities are not being left behind, ignored, or further burdened by the growing need for transit, housing, and impacts of climate change.

Connect SoCal should independently discuss rural, unincorporated, and agriculturally rich communities and how this plan will help advance their specific community priorities through 2045.

- b. **Directly address urban greening deficiencies in environmental justice communities and transit access to parks and green spaces.** As stated in the Environmental Justice

Technical Report, “not all parks are created equal, however, and many neighborhoods do not have access to a variety of public resources” (pg. 73). This is particularly true for rural communities. Green spaces in the ECV are almost nonexistent and any new park projects that are planned and developed, they’re done so with a minimal capacity for carbon sequestration. SCAG should outline a strategy to incentivize jurisdictions to prioritize green space development and access to parks that have significant carbon sequestration potential and minimal impacts to the region's water supply.

Climate Change and Air Quality

Strategy recommendations:

- a. **Incorporate a “Just Transition” strategy to ensure compliance with the statewide efforts of reducing greenhouse gas emissions.** A Just Transition framework is an approach to shifting from an extractive and polluting economy to a more equitable, sustainable, and renewable one. This emphasizes the process of electrification while eliminating the reliance of traditional fossil fuels, including petroleum, natural gas, and coal. While certain fuels may be known to produce less GHGs, their reliance and usage, however, still contribute to climate change and the very issues that Connect SoCal is created to solve. Policies and strategies that contribute to such a vision can better meet the goals of a Sustainable Communities Strategy and take the vision of Connect SoCal a step further than just meeting the State’s requirements.
- b. **Support air quality mitigation strategies to protect public health in addition to emission reduction efforts.** As noted in the Draft Plan and Technical Reports, the SCAG region is designated as a federal non-attainment area, meaning that it fails to meet National Ambient Air Quality Standards (NAAQS) for criteria air pollutants that are harmful to human health. Areas like the Coachella Valley have also received this designation, not only because of its own local stationary and mobile sources of emissions, but also because of the high levels of emissions travelling to the area from the South Coast Air Basin. Through our advocacy with South Coast AQMD and the Community Air Protection Program (AB 617) we’ve been told that reducing emissions at the source is the only priority and way to reach attainment. Connect SoCal should acknowledge that such emissions are coming from a wide range of sources and there should be a mitigation strategy in place to assist communities that are also being impacted, even if the emissions are not being locally produced.
- c. **Incorporate effective preventative and response measures to unauthorized dumping and fires in EJ, unincorporated, and Tribal communities.** Illegal dumping and burning is a common practice in desert, unincorporated, and Tribal lands. This has led to

the spread of mulch fires and other types in the ECV. Fires and poor air quality greatly impact the residents in this region, especially because they don't have the necessary measures to protect them from harmful air. Mobile homes are poorly weatherized, farmworkers receive no protection, and children and seniors are seriously affected. From recent events, residents have asked for a stronger community engagement and communications plan, a stronger protocol for responding to such hazards, and for more government accountability and preventative measures to both the illegal dumping and burning, and other environmental hazards that happen in the community, including tribal land.

Active Transportation and Public Transit

Active transportation and public transit infrastructure is highly important for residents to better navigate their communities, improve their health and safety, and to more effectively reduce their contributions to greenhouse gas emissions.

Strategy recommendations:

- a. **Provide stronger solutions and policies for improving transit, mobility, and infrastructure in underdeveloped regions.** Communities like the Eastern Coachella Valley have greatly lack the necessary infrastructure for residents to travel within the area in a safe and easy way. Effective transit, mobility, and other supporting infrastructure is nearly nonexistent in the majority of the region and residents' quality of life and health are greatly impacted.
- b. **Prioritize funding projects that most benefit DACs and DUCs.** Projects that help increase access to active transportation infrastructure and public transit heavily rely on population density and other urban characteristics of a community to receive grant funding. Some of these projects, as a result, don't benefit the most vulnerable communities. CV Link is an example of how communities in the ECV are always the last to receive investment and infrastructure. Connect SoCal should do better by elevating true community-led and driven efforts on mobility justice. The current projects that are listed for the ECV region do not include any significant investments for active transportation or other mobility projects that have been identified by community residents. Please refer to the ECV Regional and Neighborhood Mobility Plans¹ that we have been developing with residents for over two years.

¹ Eastern Coachella Valley Regional Mobility Plan
(<https://rctlma.org/trans/Project-Information/Transportation-Planning-Projects>)

- c. **Support appropriate mobility options that best fit the community.** Mobility in rural areas looks much different than urban areas. Therefore, Connect SoCal should better support diverse, environmentally friendly mobility options that are appropriate to the community. This includes more zero-emission cars, e-scooters and e-bikes, micro-transit, and all the supporting infrastructure needed to support these alternatives. Such infrastructure should also make sure to address and mitigate the impacts of any extreme weather conditions experienced in a community.
- d. **Align your transportation expenditures to meet the needs of low-wage workers and inclusion of public transit and active mobility projects.** Although SCAG acknowledges that low-wage workers who experience longer distance commutes, especially in the inland region, the investments outlined in your financing and expenditure plans are not reflective of the need to improve public transit and alternate modes of transportation. Rather, SCAG prioritizes highway expansions and undermines the potential for disadvantaged communities to receive stronger mobility investments. SCAG should make a better effort at ensuring that investments are directed towards more mobility projects, especially in transit deficient and disadvantaged communities, that are frequent, reliable, reduce emissions and people's reliance on personal occupancy vehicles. Such investments should prioritize zero-emission transit and supporting infrastructure projects.
- e. **SCAG should implement the strategies above to frontload these projects and prioritize these investments in the early stages of implementing Connect SoCal.** With this strategy, Connect SoCall will be able to better meet it's GHG reduction goals as well as other climate targets faster. It will also support more equitable planning and land use practices that are drastically needed in rural and underdeveloped communities.

Land-Use

Strategy recommendations:

- a. **Enhance the inclusivity of rural communities in your TOD and HQTA framework.** Similar to the first strategy recommendation under Environmental Justice, a specialized analysis of rural needs and conditions should be developed to better prioritize investments in rural communities and develop specific policies and strategies tailored to such communities. Connect SoCal should identify ways in which to address this. Chapter 3 emphasizes that "priority must be placed...on urban and suburban infill" (pg. 50, Connect SoCal). Areas that are identified for Transit Oriented Development and as High Quality Transit Areas, while beneficial to development in urban regions, still further perpetuates the lack of investment in rural communities that don't already have good

transit infrastructure. The current framework is set to continue the disenfranchisement and underdevelopment of communities across SCAG because of their given landscape and geography. One avenue includes strengthening the Neighborhood Planning Areas to be more inclusive and adaptable to the ECV communities while also adopting policies and actions to support the expected housing and job growth. This analysis, especially for your Neighborhood Planning Areas, should be matched with the appropriate investments for implementation.

b. **Integrate stronger Connect SoCal should better outline anti-displacement policies and ordinances that can help prevent the negative outcomes of gentrification.**

Although the Draft acknowledges the possibility of gentrification with infill development, it doesn't, however, outline practices or policies for jurisdictions to follow that clearly state how and why planners should more effectively prevent the process of gentrification.

c. **Emphasize the protection of natural lands to deter unwanted and unnecessary luxury development that does not address the housing crisis in California or other EJ priorities.**

Under the Natural Lands section of the Draft Plan presents the fact that such lands exist only in "remote desert areas far from incorporated areas" therefore reducing the concern of natural lands for urban areas (pg. 32). This type of language is another example of how disregarded rural areas are in such significant plans. Given the significance of natural lands in the desert region, the Draft Plan should also develop an analysis of existing habitat and conservation plans and more effectively promote policies that help deter unwanted luxury development that don't serve nearby environmental justice communities. Farmlands in the ECV are extremely vulnerable to rezoning in order to allow more development into the area, but these changes have never been for the purpose of increasing affordable housing development, but rather exclusive and luxury developments for more affluent communities.

d. **SCAG should be more inclusive of indigenous and Native American communities and the role they play in land-use planning and decision-making processes.**

Increasing inclusivity will all members of a region is highly important, especially with the various Tribes in the SCAG's geography. First and foremost, Tribal sovereignty and autonomy should be fully respected, but SCAG should also identify ways in which it is engaging with Tribal communities. The ECV, for example, is home to the Torres Martinez Desert Cahuilla Indians who are extremely engaged in different community efforts to advance environmental justice. SCAG should identify a protocol for how to engage with support indigenous communities in environmental justice communities.

Goods Movement

Strategy recommendations:

- a. **Better highlight the impacts that the goods movement industry has on environmental justice communities and include mitigation measures.** While the goods movement does provide some economic benefits to workers in the industry, the Draft Plan's tone, specifically in the Goods Movement Technical Report, on this topic minimizes the public health impacts that it has on people and the environment at every point of the freight transportation system. Although we commend the Draft Plan's path to electrification of the industry, there are still land-use and planning practices that facilitate goods movement and the siting of warehouses that consequently harm and impact people's health. The Draft should clearly prioritize public health over profit and economic development, but also propose creative solutions for residents to be able to have clean air and clean jobs. Stronger and more thorough mitigation and adaptation policies should also be developed to address the existing on ongoing impacts of the freight and logistics industry until a fully electric system has been implemented.

- b. **Create a precedent for good land-use policies and practices.** Warehouses can be primarily found in low-income communities and communities of color that face a number of other EJ issues. The placement of warehouses in their communities demonstrates a long history of environmental racism and although this industry helps strengthen the region's economy, it has in fact been a major contributor to the declining air quality in the region, and one of the responsible entities for the growing percentage in respiratory illnesses in neighboring communities. An example to follow would be the General Plan Guidelines for Economic Development created by the Office of Planning and Research². The Economic Development chapter includes good language on how to ensure that economic development aligns with the objectives of creating healthy communities.

Funding and Resources:

Strategy recommendations:

- a. **Create a technical assistance guide that captures all available funding programs to assist jurisdictions in the application process.** Jurisdictions are often hesitant or reluctant to applying for planning or infrastructure implementation grants for disadvantaged and environmental justice communities. This often attests to the lack of

² Chapter 7. Economic Development and the General Plan. Governor's Office of Planning and Research. <http://opr.ca.gov/planning/general-plan/guidelines.html>

capacity, limited political will, or the belief that a project, especially in a rural community, would never be competitive enough to be awarded. Connect SoCal can help change this narrative by creating a detailed technical assistance guide to all available funding programs -- including local, regional, state, and federal -- for jurisdictions to better identify opportunities for their region and implement Connect SoCal policies. This can create a simplified pathway for jurisdictions to better follow Connect SoCal's vision.

- b. **Utilize additional tools and resources to more equitably identify and assist environmental justice (EJ) communities.** The ECV is a unique region that is not well represented due to a lack of data and a population that is considered "hard to count" and therefore poorly represented on data tools like CalEnviroScreen 3.0. Communities should be able to provide supporting documentation like studies, reports, community science data, and other resources that will help elevate the EJ issues in their communities to better capture the impacts they face.
- c. **Provide guidance on how jurisdictions can better plan and address operations and maintenance costs for projects.** One of the reasons jurisdictions often don't push for projects is because they are concerned about the high costs of operations and maintenance a project would incur. Similar to the first recommendation under this section, a resource or technical assistance guide should be developed to identify opportunities that jurisdictions can leverage to better address the high costs of operations and maintenance.

Again, we thank you for the opportunity to comment on the Draft Connect SoCal 2020 Plan (RTP/SCS), for the continued partnership with SCAG, and for Staff's receptiveness to previous comments and recommendations we've made throughout the development of the Draft Plan. We look forward to working with you all on the inclusion of these recommended policies and strategies and their implementation. For further discussion, questions, or other requests, please do not hesitate to contact Rebecca Zaragoza at [REDACTED] email [REDACTED]

Respectfully,

Rebecca Zaragoza
 Senior Policy Advocate
 Leadership Counsel for Justice and Accountability



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

January 24, 2020

RE: Draft Connect SoCal Plan Comments

To whom it may concern:

Thank you for the opportunity to provide comments on the Draft 2020 RTP/SCS, or Connect SoCal (Draft Plan). Leadership Counsel has worked in the Eastern Coachella Valley (ECV) for over six years, advocating at the local, regional, state, and federal levels on the overlapping issues of land use, transportation, climate change, safe and affordable drinking water, affordable housing, government accountability, and equitable investment in disadvantaged communities. We seek to advance environmental justice in some of the most vulnerable communities in California and we do so in partnership with frontline communities and community residents.

Southern California is home to a diverse geographic landscape with a population just as diverse. It's a region with immense opportunity and unique challenges. Planning, therefore, is an integral tool to ensuring a just and thriving region for all people. Through our comments, we seek to strengthen Connect SoCal's policies to create sustainable, equitable, and effective transportation that directly benefit all of SCAG's residents, regardless of race, socioeconomic status, language, or place. At the forefront of such a plan, SCAG must acknowledge the distinct issues faced in different parts of the region and assess the specific solutions needed to solve them. In our letter, we hope to provide such insight on rural, agricultural, and unincorporated communities that most face hardship with transportation, housing, and the impacts of climate change. This letter also provides specific insight on the particular issues faced in the Eastern Coachella Valley (ECV) in Riverside County.

Our comments to the Draft are informed and motivated by our work directly with low-income communities and communities of color in the ECV. Leadership Counsel works to ensure that the ECV receives the benefits of equitable investment and healthy development in order to enjoy healthy and safe places to live. Our direct partnership with community residents helps inform our approach with regional transportation planning. We have thus worked to elevate the prominent issues in the ECV with respect to mobility, safety, connectivity, access, and overall infrastructure

deficiencies that can be seen throughout different unincorporated, rural, agricultural, and low-income communities and communities of color.

We commend the staff for their continued engagement and efforts to connect with community-based and non-profit organizations, particularly in disadvantaged communities. We look forward to continued collaboration with staff and partners to ensure that Connect SoCal includes a comprehensive and equitable set of policies to address transportation, sustainability, and housing across the region.

Below is a list of recommendations captured by category that will help improve and strengthen the vision of Connect SoCal 2020:

Community Outreach and Engagement

Strategy recommendations:

- a. **Include stronger practices for meaningful community outreach and engagement.** We appreciate the level of engagement that staff conducted with community-based and nonprofit organizations working with environmental justice communities. These efforts should continue and can be improved upon with more direct partnerships. Organizations working on the ground are capable of having much more capacity by working together, especially if they work within the same region. Helping organizations build capacity and cross-sector collaborations can help advance the work much further. SCAG can help advance this by working with organizations and encouraging partnered outreach efforts to better reach community residents. This has worked with us in the ECV and we've been able to build our relationships with partners and align our efforts between organizations for one united cause.

Overall, SCAG is encouraged to rely on the support and guidance of community-based and non-profit organizations, but should still employ their responsibility as the region's Metropolitan Planning Organization to lead an effective and meaningful community engagement process. This includes conducting public community workshops and meetings that provide background information, full context, public comment and design opportunities, as well as follow-up opportunities with residents to maintain engagement throughout the entirety of the planning process.

In addition, these policies and practices should be outlined in the Draft for jurisdictions and planners to follow as they work to implement the vision of Connect SoCal through a community driven process.

- a. **Reinforce the importance of inter-agency and cross-sector collaboration to better facilitate project development, funding, implementation, and operations and maintenance.** To better support the community and Connect SoCal’s vision, there needs to be stronger collaboration and overall communication practices between the different agencies responsible for executing projects. It is equally important to integrate these efforts within the community engagement process to ensure that residents are a part of the conversation every step of the way.

Environmental Justice and Public Health

We appreciate that environmental justice is being increasingly acknowledged by SCAG in this years update as playing a vital role in all sectors of planning, as has long been advocated by environmental justice communities and organizations.

We are glad to see that an environmental justice toolkit has been developed and included in the Draft and that it draws from additional resources like the California Environmental Justice Alliance SB 1000 toolkit which was developed with the expertise of several environmental justice leaders from across the state.

Strategy recommendations:

- a. **Ensure a better understanding and inclusion of the serious needs and deficiencies of rural and unincorporated communities in the Draft.** Rural communities provide a unique landscape for planning and development. Given SCAG’s vast geography and growing needs in more densely populated areas, rural communities and subregions tend to see less investment and prioritization. Nonetheless, such communities, like those located more inland, play an important role in the character and economy of SCAG and the State of California.

It is incredibly important to understand the unique challenges faced in rural communities, especially ones in unincorporated and environmental justice areas. As such, unique solutions are necessary to ensure that communities are not being left behind, ignored, or further burdened by the growing need for transit, housing, and impacts of climate change.

Connect SoCal should independently discuss rural, unincorporated, and agriculturally rich communities and how this plan will help advance their specific community priorities through 2045.

- b. **Directly address urban greening deficiencies in environmental justice communities and transit access to parks and green spaces.** As stated in the Environmental Justice

Technical Report, “not all parks are created equal, however, and many neighborhoods do not have access to a variety of public resources” (pg. 73). This is particularly true for rural communities. Green spaces in the ECV are almost nonexistent and any new park projects that are planned and developed, they’re done so with a minimal capacity for carbon sequestration. SCAG should outline a strategy to incentivize jurisdictions to prioritize green space development and access to parks that have significant carbon sequestration potential and minimal impacts to the region's water supply.

Climate Change and Air Quality

Strategy recommendations:

- a. **Incorporate a “Just Transition” strategy to ensure compliance with the statewide efforts of reducing greenhouse gas emissions.** A Just Transition framework is an approach to shifting from an extractive and polluting economy to a more equitable, sustainable, and renewable one. This emphasizes the process of electrification while eliminating the reliance of traditional fossil fuels, including petroleum, natural gas, and coal. While certain fuels may be known to produce less GHGs, their reliance and usage, however, still contribute to climate change and the very issues that Connect SoCal is created to solve. Policies and strategies that contribute to such a vision can better meet the goals of a Sustainable Communities Strategy and take the vision of Connect SoCal a step further than just meeting the State’s requirements.
- b. **Support air quality mitigation strategies to protect public health in addition to emission reduction efforts.** As noted in the Draft Plan and Technical Reports, the SCAG region is designated as a federal non-attainment area, meaning that it fails to meet National Ambient Air Quality Standards (NAAQS) for criteria air pollutants that are harmful to human health. Areas like the Coachella Valley have also received this designation, not only because of its own local stationary and mobile sources of emissions, but also because of the high levels of emissions travelling to the area from the South Coast Air Basin. Through our advocacy with South Coast AQMD and the Community Air Protection Program (AB 617) we’ve been told that reducing emissions at the source is the only priority and way to reach attainment. Connect SoCal should acknowledge that such emissions are coming from a wide range of sources and there should be a mitigation strategy in place to assist communities that are also being impacted, even if the emissions are not being locally produced.
- c. **Incorporate effective preventative and response measures to unauthorized dumping and fires in EJ, unincorporated, and Tribal communities.** Illegal dumping and burning is a common practice in desert, unincorporated, and Tribal lands. This has led to

the spread of mulch fires and other types in the ECV. Fires and poor air quality greatly impact the residents in this region, especially because they don't have the necessary measures to protect them from harmful air. Mobile homes are poorly weatherized, farmworkers receive no protection, and children and seniors are seriously affected. From recent events, residents have asked for a stronger community engagement and communications plan, a stronger protocol for responding to such hazards, and for more government accountability and preventative measures to both the illegal dumping and burning, and other environmental hazards that happen in the community, including tribal land.

Active Transportation and Public Transit

Active transportation and public transit infrastructure is highly important for residents to better navigate their communities, improve their health and safety, and to more effectively reduce their contributions to greenhouse gas emissions.

Strategy recommendations:

- a. **Provide stronger solutions and policies for improving transit, mobility, and infrastructure in underdeveloped regions.** Communities like the Eastern Coachella Valley have greatly lack the necessary infrastructure for residents to travel within the area in a safe and easy way. Effective transit, mobility, and other supporting infrastructure is nearly nonexistent in the majority of the region and residents' quality of life and health are greatly impacted.
- b. **Prioritize funding projects that most benefit DACs and DUCs.** Projects that help increase access to active transportation infrastructure and public transit heavily rely on population density and other urban characteristics of a community to receive grant funding. Some of these projects, as a result, don't benefit the most vulnerable communities. CV Link is an example of how communities in the ECV are always the last to receive investment and infrastructure. Connect SoCal should do better by elevating true community-led and driven efforts on mobility justice. The current projects that are listed for the ECV region do not include any significant investments for active transportation or other mobility projects that have been identified by community residents. Please refer to the ECV Regional and Neighborhood Mobility Plans¹ that we have been developing with residents for over two years.

¹ Eastern Coachella Valley Regional Mobility Plan
(<https://rctlma.org/trans/Project-Information/Transportation-Planning-Projects>)

- c. **Support appropriate mobility options that best fit the community.** Mobility in rural areas looks much different than urban areas. Therefore, Connect SoCal should better support diverse, environmentally friendly mobility options that are appropriate to the community. This includes more zero-emission cars, e-scooters and e-bikes, micro-transit, and all the supporting infrastructure needed to support these alternatives. Such infrastructure should also make sure to address and mitigate the impacts of any extreme weather conditions experienced in a community.
- d. **Align your transportation expenditures to meet the needs of low-wage workers and inclusion of public transit and active mobility projects.** Although SCAG acknowledges that low-wage workers who experience longer distance commutes, especially in the inland region, the investments outlined in your financing and expenditure plans are not reflective of the need to improve public transit and alternate modes of transportation. Rather, SCAG prioritizes highway expansions and undermines the potential for disadvantaged communities to receive stronger mobility investments. SCAG should make a better effort at ensuring that investments are directed towards more mobility projects, especially in transit deficient and disadvantaged communities, that are frequent, reliable, reduce emissions and people's reliance on personal occupancy vehicles. Such investments should prioritize zero-emission transit and supporting infrastructure projects.
- e. **SCAG should implement the strategies above to frontload these projects and prioritize these investments in the early stages of implementing Connect SoCal.** With this strategy, Connect SoCall will be able to better meet it's GHG reduction goals as well as other climate targets faster. It will also support more equitable planning and land use practices that are drastically needed in rural and underdeveloped communities.

Land-Use

Strategy recommendations:

- a. **Enhance the inclusivity of rural communities in your TOD and HQTA framework.** Similar to the first strategy recommendation under Environmental Justice, a specialized analysis of rural needs and conditions should be developed to better prioritize investments in rural communities and develop specific policies and strategies tailored to such communities. Connect SoCal should identify ways in which to address this. Chapter 3 emphasizes that "priority must be placed...on urban and suburban infill" (pg. 50, Connect SoCal). Areas that are identified for Transit Oriented Development and as High Quality Transit Areas, while beneficial to development in urban regions, still further perpetuates the lack of investment in rural communities that don't already have good

transit infrastructure. The current framework is set to continue the disenfranchisement and underdevelopment of communities across SCAG because of their given landscape and geography. One avenue includes strengthening the Neighborhood Planning Areas to be more inclusive and adaptable to the ECV communities while also adopting policies and actions to support the expected housing and job growth. This analysis, especially for your Neighborhood Planning Areas, should be matched with the appropriate investments for implementation.

b. **Integrate stronger Connect SoCal should better outline anti-displacement policies and ordinances that can help prevent the negative outcomes of gentrification.**

Although the Draft acknowledges the possibility of gentrification with infill development, it doesn't, however, outline practices or policies for jurisdictions to follow that clearly state how and why planners should more effectively prevent the process of gentrification.

c. **Emphasize the protection of natural lands to deter unwanted and unnecessary luxury development that does not address the housing crisis in California or other EJ priorities.**

Under the Natural Lands section of the Draft Plan presents the fact that such lands exist only in "remote desert areas far from incorporated areas" therefore reducing the concern of natural lands for urban areas (pg. 32). This type of language is another example of how disregarded rural areas are in such significant plans. Given the significance of natural lands in the desert region, the Draft Plan should also develop an analysis of existing habitat and conservation plans and more effectively promote policies that help deter unwanted luxury development that don't serve nearby environmental justice communities. Farmlands in the ECV are extremely vulnerable to rezoning in order to allow more development into the area, but these changes have never been for the purpose of increasing affordable housing development, but rather exclusive and luxury developments for more affluent communities.

d. **SCAG should be more inclusive of indigenous and Native American communities and the role they play in land-use planning and decision-making processes.**

Increasing inclusivity will all members of a region is highly important, especially with the various Tribes in the SCAG's geography. First and foremost, Tribal sovereignty and autonomy should be fully respected, but SCAG should also identify ways in which it is engaging with Tribal communities. The ECV, for example, is home to the Torres Martinez Desert Cahuilla Indians who are extremely engaged in different community efforts to advance environmental justice. SCAG should identify a protocol for how to engage with support indigenous communities in environmental justice communities.

Goods Movement

Strategy recommendations:

- a. **Better highlight the impacts that the goods movement industry has on environmental justice communities and include mitigation measures.** While the goods movement does provide some economic benefits to workers in the industry, the Draft Plan's tone, specifically in the Goods Movement Technical Report, on this topic minimizes the public health impacts that it has on people and the environment at every point of the freight transportation system. Although we commend the Draft Plan's path to electrification of the industry, there are still land-use and planning practices that facilitate goods movement and the siting of warehouses that consequently harm and impact people's health. The Draft should clearly prioritize public health over profit and economic development, but also propose creative solutions for residents to be able to have clean air and clean jobs. Stronger and more thorough mitigation and adaptation policies should also be developed to address the existing on ongoing impacts of the freight and logistics industry until a fully electric system has been implemented.

- b. **Create a precedent for good land-use policies and practices.** Warehouses can be primarily found in low-income communities and communities of color that face a number of other EJ issues. The placement of warehouses in their communities demonstrates a long history of environmental racism and although this industry helps strengthen the region's economy, it has in fact been a major contributor to the declining air quality in the region, and one of the responsible entities for the growing percentage in respiratory illnesses in neighboring communities. An example to follow would be the General Plan Guidelines for Economic Development created by the Office of Planning and Research². The Economic Development chapter includes good language on how to ensure that economic development aligns with the objectives of creating healthy communities.

Funding and Resources:

Strategy recommendations:

- a. **Create a technical assistance guide that captures all available funding programs to assist jurisdictions in the application process.** Jurisdictions are often hesitant or reluctant to applying for planning or infrastructure implementation grants for disadvantaged and environmental justice communities. This often attests to the lack of

² Chapter 7. Economic Development and the General Plan. Governor's Office of Planning and Research. <http://opr.ca.gov/planning/general-plan/guidelines.html>

capacity, limited political will, or the belief that a project, especially in a rural community, would never be competitive enough to be awarded. Connect SoCal can help change this narrative by creating a detailed technical assistance guide to all available funding programs -- including local, regional, state, and federal -- for jurisdictions to better identify opportunities for their region and implement Connect SoCal policies. This can create a simplified pathway for jurisdictions to better follow Connect SoCal's vision.

- b. **Utilize additional tools and resources to more equitably identify and assist environmental justice (EJ) communities.** The ECV is a unique region that is not well represented due to a lack of data and a population that is considered "hard to count" and therefore poorly represented on data tools like CalEnviroScreen 3.0. Communities should be able to provide supporting documentation like studies, reports, community science data, and other resources that will help elevate the EJ issues in their communities to better capture the impacts they face.
- c. **Provide guidance on how jurisdictions can better plan and address operations and maintenance costs for projects.** One of the reasons jurisdictions often don't push for projects is because they are concerned about the high costs of operations and maintenance a project would incur. Similar to the first recommendation under this section, a resource or technical assistance guide should be developed to identify opportunities that jurisdictions can leverage to better address the high costs of operations and maintenance.

Again, we thank you for the opportunity to comment on the Draft Connect SoCal 2020 Plan (RTP/SCS), for the continued partnership with SCAG, and for Staff's receptiveness to previous comments and recommendations we've made throughout the development of the Draft Plan. We look forward to working with you all on the inclusion of these recommended policies and strategies and their implementation. For further discussion, questions, or other requests, please do not hesitate to contact Rebecca Zaragoza at [REDACTED] email [REDACTED]

Respectfully,

Rebecca Zaragoza
 Senior Policy Advocate
 Leadership Counsel for Justice and Accountability

January 24, 2020

Roland Ok
Southern California Association of Governments
900 Wilshire Blvd, Suite 1700
Los Angeles, CA 90017

SUBJECT: "Connect SoCal" DEIR Comments

On behalf of BizFed, a grassroots alliance of more than 190 business organizations representing 400,000 employers with over 3.5 million employees in Los Angeles County, we want to thank SCAG for the great work in presenting this plan to many diverse stakeholders in Southern California.

We see great things in the plan that we strongly support, such as increasing housing production, leveraging investments from enhanced infrastructure financing districts (EIFD), supporting 5G Smart Cities, and supporting increased public transit and Metrolink service. However, we heed caution to the calls for imposing vehicle miles travelled (VMT) reduction targets and the fees attached to them as a strategy for greenhouse gas (GHG) reduction. This strategy and its fees have negative impacts on disadvantaged communities. We view this as counterproductive to BizFed's anti-poverty goal of lifting one million persons in Los Angeles County out of poverty over this decade.

California ranks at the top in the United States for poverty and homelessness – both of which are attributable directly to the housing supply shortage, high housing prices that are nearly three times above the national average, and longer commutes where working families are "driving until they qualify" for housing that they can rent or buy.

The call for user based vehicle mileage travel fees - in Chapter 5 of the Environmental Justice section of the plan - will hurt the very people who are most disadvantaged. These workers are paying more as they travel farther to work at a good paying job and afford a place to live, thereby spending more of their income on basic necessities such as transportation and shelter.

BizFed recognizes the call for increased public transit service and multi-family transit-oriented housing production as a strategy to mitigate those concerns. We believe the implementation of these goals will be hampered by CEQA lawsuit abuses. Since 2013, over 70% of these CEQA lawsuits are targeted at stopping infill, multi-family, and transit-oriented housing. According to CARB, these are housing types are needed to invest and support our environmental goals.

In 2012 and 2016, SCAG's two prior RTP/SCS met the required GHG reduction targets. The RTP/SCS were the result of local input on land use planning, full respect for voter-approved funded transportation infrastructure projects as required by longstanding laws for efficient transportation and goods movement solutions.

These voter approved transportation projects are mostly funded from sales taxes which can be volatile to outside triggers such as the recession of 2008-10, resulting in a decrease of sales tax receipts. If these assumptions on VMT reductions, in the RTP/SCS, are to be delivered, we may see dramatic reductions in goods movement infrastructure and sales tax receipts, which are critical to the state's economy. The last time a significant reduction in VMTs occurred was during the recession of 2008-2010. However, with the current trends in e-commerce as well as alternative transportation mobility options such as Uber and Lyft, we have seen VMT's increase.

BizFed believes there is an opportunity to include in this plan strategies that will help deliver our housing and mobility goals. We want to partner with SCAG in making these goals a reality. We believe that policy tools such as; the return of community redevelopment agencies, leveraging tax increment financing to invest in affordable housing projects, and CEQA reforms against lawsuit abuses for transportation infrastructure projects and housing developments of all kinds both urban and rural, are essential to the conversation that will successfully implement this bold, economically and environmentally sustainable vision SCAG has laid out in the plan.

We appreciate SCAG's steadfast efforts to assure that SB 375 can be implemented, complying with its statutory protections for a healthy economy and growing population.

BizFed will help SCAG with the above solutions to truly connect all Southern Californians.

Sincerely,



Sandy Sanchez
BizFed Chair
FivePoint



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

BizFed Association Members

Action Apartment Association
 Alhambra Chamber of Commerce
 American Beverage Association
 American Hotel & Lodging Association
 American Institute of Architects – Los Angeles
 Angeles Emeralds
 Apartment Association, California Southern Cities
 Apartment Association of Greater Los Angeles
 Arcadia Association of REALTORS
 AREAA North Los Angeles SFV SCV
 Asian Business Association
 Association of Club Executives
 Association of Independent Commercial Producers
 Azusa Chamber of Commerce
 Bell Gardens Chamber of Commerce
 Beverly Hills Bar Association
 Beverly Hills Chamber of Commerce
 BNI4SUCCESS
 Boyle Heights Chamber of Commerce
 Building Industry Association, LA / Ventura
 Building Industry Association, Baldyview
 Building Owners & Managers Association, Greater LA
 Burbank Association of REALTORS
 Burbank Chamber of Commerce
 Business & Industry Council for Emergency Planning & Preparedness
 Business Resource Group
 CalAsian Chamber
 CalCFA
 California Apartment Association, Los Angeles
 California Asphalt Pavement Association
 California Association of Food Banks
 California Bankers Association
 California Bus Association
 California Business Roundtable
 California Cannabis Industry Association
 California Construction and Industry Materials Association
 California Contract Cities Association
 California Fashion Association
 California Gaming Association
 California Grocers Association
 California Hispanic Chamber of Commerce
 California Hotel & Lodging Association
 California Independent Oil Marketers Association
 California Independent Petroleum Association
 California Life Sciences Association
 California Manufacturers & Technology Association
 California Metals Coalition
 California Restaurant Association
 California Retailers Association
 California Small Business Alliance
 California Society of CPAs -Los Angeles Chapter
 California Sportfishing League
 California Trucking Association
 Carson Chamber of Commerce
 Carson Dominguez Employers Alliance
 CDC Small Business Finance
 Central City Association
 Century City Chamber of Commerce
 Cerritos Regional Chamber of Commerce
 Citrus Valley Association of REALTORS
 Commercial Industrial Council/Chamber of Commerce
 Construction Industry Air Quality Coalition
 Construction Industry Coalition on Water Quality
 Council on Trade and Investment for

Filipino Americans
 Covina Chamber of Commerce
 Culver City Chamber of Commerce
 Downey Association of REALTORS
 Downey Chamber of Commerce
 Downtown Long Beach Alliance
 El Monte/South El Monte Chamber
 El Segundo Chamber of Commerce
 Employers Group
 Engineering Contractor's Association
 EXP
 F.A.S.T. - Fixing Angelenos Stuck In Traffic
 FilmLA
 Friends of Hollywood Central Park
 Fur Information Council of America
 FuturePorts
 Gardena Valley Chamber of Commerce
 Gateway to LA
 Glendale Association of REALTORS
 Glendale Chamber of Commerce
 Glendora Chamber of Commerce
 Greater Antelope Valley Association of REALTORS
 Greater Lakewood Chamber of Commerce
 Greater Los Angeles African American Chamber
 Greater Los Angeles Association of REALTORS
 Greater Los Angeles New Car Dealers Association
 Harbor Trucking Association
 Historic Core Business Improvement District
 Hollywood Chamber of Commerce
 Hollywood Property Owners Alliance
 Hong Kong Trade Development Council
 Hospital Association of Southern California
 Hotel Association of Los Angeles
 Huntington Park Area Chamber of Commerce
 Independent Cities Association
 Industry Manufacturers Council
 Inglewood Airport Area Chamber of Commerce
 Inland Empire Economic Partnership
 International Warehouse Logistics Association
 Irwindale Chamber of Commerce
 La Cañada Flintridge Chamber of Commerce
 L.A. County Medical Association
 L.A. Fashion District BID
 L.A. South Chamber of Commerce
 Larchmont Boulevard Association
 Latino Food Industry Association
 LAX Coastal Area Chamber of Commerce
 League of California Cities
 Long Beach Area Chamber of Commerce
 Los Angeles Area Chamber of Commerce
 Los Angeles County Board of Real Estate
 Los Angeles County Waste Management Association
 Los Angeles Gateway Chamber of Commerce
 Los Angeles Gay and Lesbian Chamber of Commerce
 Los Angeles Latino Chamber of Commerce
 Los Angeles Parking Association
 Maple Business Council
 Motion Picture Association of America
 MoveLA a Project of Community
 NAJOP Southern California Chapter
 National Association of Royalty Owners
 National Association of Tobacco Outlets
 National Association of Women Business Owners
 National Association of Women Business Owners – Los Angeles

National Hispanic Medical Association
 National Latina Business Women
 Orange County Business Council
 Pacific Merchant Shipping Association
 Pacific Palisades Chamber of Commerce
 Panorama City Chamber of Commerce
 Paramount Chamber of Commerce
 Pasadena Chamber of Commerce
 Pasadena-Foothills Association of Realtors
 PhRMA
 Planned Parenthood Southern Affiliates of California
 Pomona Chamber of Commerce
 Propel L.A.
 Rancho Southeast Association of REALTORS
 Recording Industry Association of America
 Regional Black Chamber - San Fernando Valley
 Regional Chamber of Commerce-San Gabriel Valley
 Rosemead Chamber of Commerce
 San Dimas Chamber of Commerce
 San Gabriel Chamber of Commerce
 San Gabriel Valley Economic Partnership
 San Pedro Peninsula Chamber of Commerce
 Santa Clarita Valley Chamber of Commerce
 Santa Clarita Valley Economic Development Corp.
 Santa Monica Chamber of Commerce
 Sherman Oaks Chamber of Commerce
 South Bay Association of Chambers
 South Bay Association of REALTORS
 South Gate Chamber of Commerce
 Southern California Contractors Association
 Southern California Golf Association
 Southern California Grant Makers
 Southern California Leadership Council
 Southern California Minority Suppliers Development Council Inc. +
 Southern California Water Coalition
 Southland Regional Association of REALTORS
 Sunland-Tujunga Chamber of Commerce
 The Young Professionals at the Petroleum Club
 Torrance Area Chamber
 Town Hall Los Angeles
 Tri-Counties Association of REALTORS
 United Chambers San Fernando Valley & Region
 United States-Mexico Chamber
 Unmanned Autonomous Vehicle Systems Association
 US Resiliency Council
 Valley Economic Alliance
 Valley Industry & Commerce Association
 Vernon Chamber of Commerce
 Vietnamese American Chamber of Commerce
 Warner Center Association
 West Hollywood Chamber of Commerce
 West Los Angeles Chamber of Commerce
 West San Gabriel Valley Association of REALTORS
 West Valley/Warner Center Association Chamber
 Western Manufactured Housing Association
 Western States Petroleum Association
 Westside Council of Chambers
 Westwood Community Council
 Westwood Village Rotary Club
 Whittier Chamber of Commerce
 Wilmington Chamber of Commerce
 World Trade Center Los Angeles
 Young Professionals in Energy - LA Chapter

2020 RTP/SCS Projects - Proposed Changes

County	Display Category	RTP ID	Lead Agency	System	Route #	Route Name	From	To	Description	Completion Year	Construction Start Year	Cost Basis Year	Project Cost (\$1,000's)	Additional Model Details
Los Angeles	RTP	1200S001	LOS ANGELES COUNTY MTA (METRO)	State Highway	10	I-10	I-605	LA/San Bernardino County Line	I-10 ExpressLanes from I-605 to LA/San Bernardino County Line.	2028	2026	2016 YOE	\$196,840	One ExpressLane in each direction. In addition to signage improvements beginning at PM LA 28.9 through PM SBD 2.03
Los Angeles	RTP	1200S005	LOS ANGELES COUNTY MTA (METRO)	State Highway	605	I-605	I-105	LA/Orange County Line	I-605 ExpressLanes from I-105 to Orange County Line.	2031	2029	2016 YOE	\$100,850	One ExpressLane in each direction. In addition to signage improvements beginning at PM ORA 3.156 through PM LA 9.7
Los Angeles	RTP	1162S011	LOS ANGELES COUNTY MTA (METRO)	State Highway	105	105	I-405	I-605 Studebaker Rd.	I-105 Express Lane from I-405 to I-605 Studebaker Rd	2029 2027			\$228,500 \$520,900	PM 1.63/17.82. 18.1 EA 31450. Existing 1 HOV and 3 to 4 Mixed Flow lanes in each direction. Restriping existing HOV lane to create 2 ExpressLanes each direction. In addition to signage improvements between PM 0.5 and PM 18.1
Los Angeles	RTP	1162S012	LOS ANGELES COUNTY MTA (METRO)	State Highway	405	405	I-10	US-101	Sepulveda Pass Transit Corridor (Ph 1) includes highway-ExpressLanes I-405 Sepulveda Pass (Phase 1) ExpressLanes	2026 2027			\$340,500 \$260,000	Existing 4 Mixed Flow lanes and 1 HOV lane in each direction. Restriping the HOV lane with existing ROW to convert into 2 ExpressLanes in each direction.

RED TEXT = proposed changes to be submitted during 2020 RTP/SCS comment period.
 STRIKETHROUGH TEXT = Delete

New 2020 RTP/SCS Strategic (Unconstrained) Projects

County	System	RTP ID	Route #	Route Name	From	To	Description	Lead Agency	Metro CR Staff Comment	Board Report
Los Angeles	State Highway	TBD	5	I-5	I-605	LA/OC county line	I-5 add Express Lanes between I-605 & LA/OC county line	LOS ANGELESCOUNTY MTA	Tier II Strategic Plan ExpressLanes Projects	https://metro.legistar.com/ViewReport.ashx?M=R&N=TextL5&GID=557&ID=3795&GUID=LA-TEST&Title=Board+Report
Los Angeles	State Highway	TBD	5	I-5	SR-170	SR-134	I-5 add Express Lanes between SR-170 & SR-134	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	57	SR-57	SR-60	LA/OC county line	SR-57 add Express Lanes between SR-60 & LA/OC county line	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	91	SR-91	I-110	LA/OC county line	SR-91 add Express Lanes between I-110 & LA/OC county line	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	134	SR-134	I-210	SR-170	SR-134 add Express Lanes between I-210 & SR-170	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	405	I-405	US-101	I-5	I-405 add Express Lanes between US-101 and I-5	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	5	I-5	SR-170	Parker Road	I-5 add Express Lanes between SR-170 and Parker Road	LOS ANGELESCOUNTY MTA	Tier III Strategic Plan ExpressLanes Projects	
Los Angeles	State Highway	TBD	14	SR-14	Avenue P8	I-5	SR-14 add Express Lanes between Avenue P8 & I-5	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	60	SR-60	I-605	LA/SB county line	SR-60 add Express Lanes between I-605 & LA/SB county line	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	118	SR-118	I-5	LA/Ventura county line	SR-118 add Express Lanes between I-5 & LA/Ventura county line	LOS ANGELESCOUNTY MTA		
Los Angeles	State Highway	TBD	170	SR-170	I-5	SR-134	SR-170 add Express Lanes between I-5 & SR-134	LOS ANGELESCOUNTY MTA		

Existing 2020 RTP/SCS Strategic Projects

Delete the following projects:

LOS ANGELES	STATE HIGHWAY	S1160255	105	I-105		I-405	I-605	I-105- ADD HOT LANE ON I-105 FROM 405 TO 605. PM 4.63/47.82. EA 31450	CALTRANS, LOS ANGELES, LA COUNTY, HAWTHORNE, LYNWOOD, PARAMOUNT, SOUTH GATE, DOWNEY, NORWALK
LOS ANGELES	STATE HIGHWAY	S1160256	405	I-405		I-110	I-105	I-405- ADD EXPRESS LANES ON I-405 BETWEEN I-110 AND I-105	CALTRANS, SBCCOG, LOS ANGELES, HAWTHORNE, LAWDALE, REDONDO BEACH, TORRANCE

TABLE 3.1 Selected Transit Capital Projects

County	Project
Los Angeles	Airport Metro Connector
Los Angeles	BRT Connector – Orange/Red Line to Gold Line
Los Angeles	Crenshaw/LAX Transit Corridor
Los Angeles	Historic Los Angeles Streetcar
Los Angeles	East San Fernando Valley Transit Corridor
Los Angeles	Gold Line Eastside Extension Phase 2 to South El Monte
Los Angeles	Gold Line Foothill Extension – Azusa to Claremont
Los Angeles	Green Line Extension to Torrance
Los Angeles	LAX Automated People Mover
Los Angeles	North San Fernando Valley Transit Corridor
Los Angeles	Orange Line BRT Improvements
Los Angeles	Purple Line Westside Subway Extension to La Cienega, Century City, Westwood
Los Angeles	Regional Connector
Los Angeles	Sepulveda Pass Transit Corridor (Phase 2)
Los Angeles	Vermont Transit Corridor
Los Angeles	West Santa Ana Branch Transit Corridor
Los Angeles	Green Line Extension to Norwalk/Santa Fe Springs Metrolink Station
Los Angeles	Red Line Extension to Hollywood Burbank Airport
Los Angeles	Slauson Light Rail – Crenshaw/LAX Transit Corridor to Blue Line
Orange	OC Streetcar
Orange	OC Transit Vision
Riverside	Coachella Valley BRT
Riverside	Rapid Commuter Corridor from Perris to San Jacinto
Riverside	RapidLink Service – Riverside, Moreno Valley, Perris
San Bernardino	Foothill/San Bernardino BRT
San Bernardino	Gold Line Extension to Montclair
San Bernardino	Passenger Rail Service from San Bernardino Metrolink Line to Ontario Airport
San Bernardino	Redlands Passenger Rail
San Bernardino	West Valley Connector Phase 1

Source: SCAG

Agustin Barajas

From: Tran, Daniel [REDACTED]
Sent: Wednesday, December 18, 2019 5:20 PM
To: Lee, Steven
Cc: Wong, Philbert
Subject: RE: Express Lanes Updates for Draft RTP
Attachments: SCAG 105 2 DT PW.jpg

Hi Steven,

As discussed, attached is the marked up map for the 105 ExpressLanes Project (RTP 1162S011) for SCAG modeling staff to clean up the project in the 2020 RTP/SCS. Per the attached map, there are arrows to help indicate which/how portions of 105 should be coded. Below is the breakdown

105 Eastbound

- Between arrows 4 and 5 – Code as ExpressLanes only, remove GP lane
- Between arrows 5 and 6 – Code GP lane to allow extension of GP on ramp onto to Studebaker

105 Westbound

- Between arrows 1 and 2 – Code as ExpressLanes, we believe is already reflected in the model, but please have SCAG confirm
- Between arrows 2 and 3 – Code as GP lanes

If it's easier we will be glad to talk to SCAG modeling staff to walk them through the markups. Let me know if you have questions.

Thanks,
Daniel

From: Tran, Daniel
Sent: Thursday, December 12, 2019 9:59 AM
To: Lee, Steven [REDACTED]
Cc: Yamarone, Mark [REDACTED]; Linsenmayer, Mark [REDACTED]; Wong, Philbert [REDACTED]
Subject: RE: Express Lanes Updates for Draft RTP

Hi Steven,

As discussed, attached is the updated the spreadsheet which includes a link to the I-105 CTC tolling application and includes updated project costs for I-105. In regards to the actual Countywide ExpressLanes Strategic Plan (Plan), within the board report there a link to the full Plan and appendices. Page 23 of the Plan includes project costs for the Tier I network, however since we split up certain projects into segments (i.e., I-405 and I-605) we have adjusted the costs accordingly. SCAG may have also escalated the costs accordingly as well based on completion year.

If you have any other questions in the meantime please let us know.

Thanks,

Daniel

From: Yamarone, Mark
Sent: Thursday, December 12, 2019 8:40 AM
To: Tran, Daniel <[REDACTED]>
Cc: Lee, Steven <[REDACTED]>
Subject: RE: Express Lanes Updates for Draft RTP

Thank you Daniel. We will review and follow-up with any questions.

Mark

Mark Yamarone

LA Metro

Deputy Executive Officer

Countywide Planning and Development / Long Range Planning

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Metro's mission is to provide world-class transportation for all.

From: Tran, Daniel
Sent: Wednesday, December 11, 2019 5:43 PM
To: Yamarone, Mark
Cc: Lee, Steven; Wong, Philbert; Linsenmayer, Mark; Tolar, Alice
Subject: RE: Express Lanes Updates for Draft RTP

Hi Mark,

The attached spreadsheet includes our 2020 RTP/SCS project changes for the ExpressLanes projects, including changes to constrained and unconstrained projects (please see separate tabs). For the constrained projects, we will only be making minor changes to the current projects listed in the draft 2020 RTP/SCS Project List and are not planning on submitting any new projects. As for the unconstrained project list (Strategic), we would like to submit our Tier II and III ExpressLanes projects as new projects to be included as part of SCAG's Strategic Project, in addition would also like to remove the I-105 and I-405 ExpressLanes projects from the strategic list since they are now part of SCAG's constrained RTP/SCS. Within the spreadsheet, I have also included links to Metro Board Reports, which provides rationale/justification for the projects.

Please feel free to reach out should you have any questions.

Thanks,

Daniel Tran

LA Metro

Manager, Transportation Planning

Congestion Reduction

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Metro's mission is to provide world-class transportation for all.

From: Yamarone, Mark
Sent: Wednesday, November 20, 2019 8:52 AM

To: Tran, Daniel <[REDACTED]>
Cc: Lee, Steven <[REDACTED]> Wong, Philbert <[REDACTED]> Linsenmayer, Mark
[REDACTED]
Subject: Express Lanes Updates for Draft RTP

Daniel:

To update Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), we are coordinating with all Metro departments for transportation projects with funding commitments between 2018-2057 to be submitted during SCAG’s Draft 2020 RTP/SCS comment period.

At this time, we are reaching out to you to review the attached 2020 RTP/SCS project list and submit either **changes to existing projects or new projects to be included**. If the projects listed are accurate and have not changed, please confirm that no change is needed.

Direct link to the full project list: https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Project-List.pdf

Please submit the following information to me by no later than **December 20, 2019**.

Information needed to revise or add projects in 2020 RTP/SCS:

- Project title and description (route name, from and to, project costs, opening year, modeling details, etc.)
- Provide a justification for why the project is being submitted or revised along with Metro Board action on project funding or adopted budget.
- Maps and/or preliminary engineering designs highlighting project improvements should also be provided since this will help SCAG modeling staff.

If you have any questions and/or comments regarding this matter, please contact me or Steven Lee at [REDACTED] or [REDACTED]

Thank you for your prompt response to this request.
Mark

Mark Yamarone
LA Metro
Deputy Executive Officer
Countywide Planning and Development / Long Range Planning
[REDACTED]
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RTP ID	Lead Agency	Route Name	From	To	Description	Completion Year	Project Cost (\$1,000's)	Additional Model Details
1162T029	LOS ANGELES COUNTY MTA (METRO)	VERMONT TRANSIT CORRIDOR	VERMONT/HOLLYWOOD	VERMONT/120TH	VERMONT TRANSIT CORRIDOR	2028	\$530,100	
1162T023	LOS ANGELES COUNTY MTA (METRO)	NORTH SAN FERNANDO VALLEY BUS RAPID TRANSIT IMPROVEMENTS	ORANGE/RED LINE NOHO STATION	ORANGE LINE CHATSWORTH STATION	NORTH SAN FERNANDO VALLEY BUS RAPID TRANSIT IMPROVEMENTS	2023	\$222,830	
1TR0706	LOS ANGELES COUNTY MTA (METRO)	EAST SAN FERNANDO VALLEY LRT	ORANGE LINE VAN NUYS STATION	SYLMAR/SAN FERNANDO METROLINK STATION	EAST SAN FERNANDO VALLEY LRT	2028	\$1,572,500	
1160001	LOS ANGELES COUNTY MTA (METRO)	SEPULVEDA TRANSIT CORRIDOR	SAN FERNANDO VALLEY	WESTSIDE	SEPULVEDA PASS TRANSIT CORRIDOR (PHASE 2)	2033	\$7,804,800	9.2 miles extending north from the Metro Orange Line, to the Sylmar/San Fernando Metrolink station.
1162T017	LOS ANGELES COUNTY MTA (METRO)	BRT CONNECTOR ORANGE/RED LINE TO GOLD LINE	ORANGE/RED LINE NORTH HOLLYWOOD STATION	PASADENA CITY COLLEGE	BRT CONNECTOR ORANGE/RED LINE TO GOLD LINE	2024	\$267,000	

RED TEXT = proposed changes to be submitted during 2020 RTP/SCS comment period.
 STRIKETHROUGH TEXT = Delete

Unconstrained RTP ID# S1160325

Remove; this is a duplicate project of RTP ID# 1160001

Unconstrained RTP ID# S1160342

Remove; this is a duplicate project of RTP ID# 1160001

Metro Highway Program Projects - Formal Comments - Draft Connect SoCal 2020 RTP/SCS Project List

Lead Agency	RTP ID	FTIP ID	Project Title	Route Name	From	To	Postmiles		RTP Project Cost	FTIP Project Cost	Completion Year	Highway Program Formal Comment	
							From	To				FTIP Projects (Starting on page 2) Comment	Financially-Constrained RTP/SCS Projects (Starting on page 117) Comment
							FOUND IN BOTH "FTIP PROJECTS" AND "FINANCIALLY-CONSTRAINED RTP/SCS" LISTS						
LOS ANGELES COUNTY MTA (METRO)	1C0401	LA08952	I-710 Corridor Project	I-710	Pico/Anaheim	SR-60	5	25	\$5,941,000	\$56,500	2040	<p>1. Change RTP ID from 1C0401 to LA08952.</p> <p>2. Change project cost from \$56,500 to \$97,608.</p> <p>3. Change project description from "I-710 CORRIDOR CAPACITY ENHANCEMENT - ADD 1 MIXED FLOW LANES BETWEEN SHORELINE DR AND SR-91 (EACH DIRECTION), ADD 2 TRUCK LANES BETWEEN WILLOW ST AND DEL AMO BLVD (EACH DIRECTION), ADD 1 MIXED FLOW LANES BETWEEN I-105 AND SR-60 (EACH DIRECTION), AND INTERCHANGE IMPROVEMENTS BETWEEN OCEAN BLVD IN LONG BEACH AND SR-60 IN EAST LOS ANGELES" to "Add 1 mixed flow lane in each direction between Shoreline Dr and SR-91 and between I-105 and SR-60; add 2 truck lanes in each direction between Willow St and Del Amo Blvd; and improve interchanges between Ocean Blvd in Long Beach and SR-60 in East Los Angeles."</p> <p>4. Change completion date from 2030 to 2035.</p>	<p>1. Change RTP ID from 1C0401 to LA08952.</p> <p>2. Change project description from "I-710 CORRIDOR CAPACITY ENHANCEMENT - ADD 1 MIXED FLOW LANES BETWEEN OCEAN BLVD AND SR-1 (EACH DIRECTION), ADD 2 TRUCK LANES BETWEEN WILLOW ST AND DEL AMO BLVD (EACH DIRECTION), ADD 1 MIXED FLOW LANES BETWEEN I-105 AND SR-60 (EACH DIRECTION), AND INTERCHANGE IMPROVEMENTS BETWEEN OCEAN BLVD IN LONG BEACH AND SR-60 IN EAST LOS ANGELES" to "Add 1 mixed flow lane in each direction between Shoreline Dr and SR-91 and between I-105 and SR-60; add 2 truck lanes in each direction between Willow St and Del Amo Blvd; and improve interchanges between Ocean Blvd in Long Beach and SR-60 in East Los Angeles."</p> <p>3. Change completion date from 2040 to 2035.</p>
LOS ANGELES COUNTY MTA (METRO)	11635003	LA0G1451	SB I-605 at Beverly Interchange Improvements	I-605	SB I-605 RAMPS	Beverly Blvd	14.1	14.6	\$25,607	\$10,757	2022	<p>1. Change project cost from \$10,757 to \$3,500.</p>	<p>1. Change project description from "The SB I-605 loop on and off ramps are to be removed and reconfigured interchange, and the SB I-605 collector road is to be removed from the mainline. Intersection improvements at Beverly Blvd and SB I-605 ramps will add a left turn lanes on WB Beverly Blvd. Class II Bike lanes to be added through the interchange matching the rail bridge which has been recently widened over UP to the north. Reconfigure to either a diamond or d-ramp interchange at Beverly Blvd." to "SB I-605 loop on and off ramp removal and reconfiguration of the existing interchange at Beverly Blvd. The southbound I-605 collector-distributor road will be removed from the mainline and the new ramps will merge/diverge directly from the mainline."</p>
LOS ANGELES COUNTY MTA (METRO)	11635004	LA0G1452	I-605 South Street	I-605	605	605	3.7	4.5	\$11,239	\$36,001	2022	<p>1. Change project cost from \$36,001 to \$22,261.</p> <p>2. Change project description from "SB I-605 at South Street Improvements Project Proposed improvements on the I-605 connector South St. off ramp by adding storage capacity and improving operations." to "Proposed improvements on the I-605 connector South St. off ramp by adding storage capacity and improving operations."</p>	<p>1. Change RTP project cost from \$11,239 to \$22,261.</p> <p>2. Change project description from "SB I-605 at South Street. The proposed project will reconfigure the off-ramp lanes so that one lane opens to dual left turn lanes and the other opens to dual right turn lanes." to "Proposed improvements on the I-605 connector South St. off ramp by adding storage capacity and improving operations."</p>
LOS ANGELES COUNTY MTA (METRO)	11635009	LA0G1457	I-605 Valley Blvd Interchange Improvements	I-605	VALLEY BLVD	TEMPLE BLVD	18.9	19.5	\$21,126	\$17,031	2024	<p>1. Change project description from "Reconfigure ramps to improve mobility and freeway/arterial operations. The project involves the reconfiguration of SB I-605 ramp by removing the horseshoe on-ramp and adding two lanes to the on-ramp. The project will also reconstruct the SB I-605 loop off and on-ramps. Lastly, the project will add a WB through lane on Valley Blvd west of Temple Ave and add a two lane left turn pocket for SB I-605 on-ramp on WB Valley Blvd." to "Reconfigure the SB I-605 on-ramp by replacing the horseshoe on-ramp with a three lane on-ramp, widen the SB loop off-ramp to three lanes, widen the NB I-605 off-ramp, modify the NB I-605 loop on-ramp, and add a lane to directly connect the NB I-605 on-ramp to both Valley Blvd and Temple Ave. Add a WB through lane on Valley Blvd west of Temple Ave, add a three-lane left turn pocket for the SB I-605 on-ramp, widen SB Temple Ave to three lanes through the Valley Blvd signalized intersection."</p>	<p>1. Change project description from "Reconfigure ramps to improve mobility and freeway/arterial operations. The project involves the reconfiguration of SB I-605 ramp by removing the horseshoe on-ramp and adding two lanes to the on-ramp. The project will also reconstruct the SB I-605 loop off and on-ramps. Lastly, the project will add a WB through lane on Valley Blvd west of Temple Ave and add a two lane left turn pocket for SB I-605 on-ramp on WB Valley Blvd." to "Reconfigure the SB I-605 on-ramp by replacing the horseshoe on-ramp with a three lane on-ramp, widen the SB loop off-ramp to three lanes, widen the NB I-605 off-ramp, modify the NB I-605 loop on-ramp, and add a lane to directly connect the NB I-605 on-ramp to both Valley Blvd and Temple Ave. Add a WB through lane on Valley Blvd west of Temple Ave, add a three-lane left turn pocket for the SB I-605 on-ramp, widen SB Temple Ave to three lanes through the Valley Blvd signalized intersection."</p>
LOS ANGELES COUNTY MTA (METRO)	11635010	LA0G1118	I-605 Corridor Improvement Project	I-605/I-5/I-105	I-105	Slauson Avenue	6.3	11.4	\$2,200,000	\$22,768	2031	<p>1. Change project cost from \$22,768 to \$46,894.</p> <p>2. Change project description from "Improvements to I-605 from Slauson Avenue to I-105 and I-5 from Florence to Paramount Boulevard, which include one additional general purpose lane or HOT lane in each direction and continuing the HOV lane through the I-605/I-5 interchange. Improvements made to the mainline, ramp, freeway-to-freeway and local interchanges, and addition of auxiliary lanes. LA-605 PM R6.3/R21/1. LA-5 PM 5.8/9.5.LA-105 PM R16.6/R18.2" to "I-605 from Fairton St. UC to Bradwell OH: add GP lane, HOT, or HOV lane &/or convert HOV to HOT lane. I-105 from Bellflower Blvd OC to Studebaker Rd: add HOV lane both directions through the I-605/I-5 interchange. I-5 from Florence Ave OC to Rio Honda Channel: add HOT/HOV direct connectors at I-605/I-105 interchange (NB to WB, WB to NB & SB to WB, WB to SB). Improve I-605 & I-5 mainline, ramps, interchanges, & aux lanes."</p>	<p>1. Change project description from "Improvements to I-605, I-105 and I-5 which may include one additional general purpose, Express Lane, or HOV lane in each direction. Improvements will be incorporated at the mainline, ramps, freeway-to-freeway and local interchanges, and addition of auxiliary lanes for each of the corridors. (P&E only)" to "I-605 from Fairton St. UC to Bradwell OH: add GP lane, HOT, or HOV lane &/or convert HOV to HOT lane. I-105 from Bellflower Blvd OC to Studebaker Rd: add HOV lane both directions through the I-605/I-5 interchange. I-5 from Florence Ave OC to Rio Honda Channel: add HOT/HOV direct connectors at I-605/I-105 interchange (NB to WB, WB to NB & SB to WB, WB to SB). Improve I-605 & I-5 mainline, ramps, interchanges, & aux lanes."</p>

Metro Highway Program Projects - Formal Comments - Draft Connect SoCal 2020 RTP/SCS Project List

Lead Agency	RTP ID	FTIP ID	Project Title	Route Name	From	To	Postmiles		RTP Project Cost	FTIP Project Cost	Completion Year	Highway Program Formal Comment	
							From	To				FTIP Projects (Starting on page 2) Comment	Financially-Constrained RTP/SCS Projects (Starting on page 117) Comment
LOS ANGELES COUNTY MTA (METRO)	11635011	LA0G1115	I-605 Corridor Improvement Project	I-605/I-10	Slauson Avenue	I-10	11.4	21.1	\$2,200,000	\$37,650	2031	<p>1. Change project cost from \$37,650 to \$38,559.</p> <p>2. Change project description from "Improvements to I-605, SR-60 and I-10 which may include one additional general purpose, Express Lane, or HOV lane in each direction. Improvements will be incorporated at the mainline, ramps, freeway-to-freeway and local interchanges, and addition of auxiliary lanes for each of the corridors. (PA&ED only)" to "I-605 Bradwell OH to 0.5 mile north of I-10: add GP, HOT, or HOV lane &/or convert HOV to HOT lane. SR-60 Santa Anita Ave OC to 0.5 mile east of Turnbull Cyn Rd UC: add GP lane both directions through I-605/SR-60 interchange, aux lanes from I-605/SR-60 interchange to 7th Ave in EB & Hacienda Blvd in WB. I-10 0.5 mile west of Peck Rd UC to Amar Rd OC: add HOT/HOV direct connector at I-605/I-10 interchange (NB to WB/WB to NB). Improve I-605 & SR-60 mainline, ramps, interchanges, & aux lanes."</p>	<p>1. Change project description from "Improvements to I-605 from Telegraph Road to I-10, which may include one additional general purpose lane in each direction or HOT lane in each direction and continuing the HOV lane through the I-605/I-10 interchange. Improvements made to the mainline, ramp, freeway-to-freeway and local interchanges, and additions of auxiliary lanes along SR-60 from Santa Anita Avenue to Turnbull Canyon Road.LA-605 PM R6.3/R21/1.LA-60 PM 10.2/15.6 -I-10 PM 28.9/31.6" to "I-605 Bradwell OH to 0.5 mile north of I-10: add GP, HOT, or HOV lane &/or convert HOV to HOT lane. SR-60 Santa Anita Ave OC to 0.5 mile east of Turnbull Cyn Rd UC: add GP lane both directions through I-605/SR-60 interchange, aux lanes from I-605/SR-60 interchange to 7th Ave in EB & Hacienda Blvd in WB. I-10 0.5 mile west of Peck Rd UC to Amar Rd OC: add HOT/HOV direct connector at I-605/I-10 interchange (NB to WB/WB to NB). Improve I-605 & SR-60 mainline, ramps, interchanges, & aux lanes."</p>
LOS ANGELES COUNTY MTA (METRO)	1M0104	LA0G1541	57/60 Confluence Chokepoint	SR-57/SR-60	PM 4.3 on SR-57 & PM 23.5 on SR-60	PM 4.8 on SR-57 & PM 26.5 on SR-60	34	33	\$300,000	\$288,600	2028	<p>1. Change project cost from \$288,600 to \$61,404.</p> <p>2. Change completion date from 2028 to 2026.</p>	<p>1. Change project description from "SR-57/SR-60 Interchange improvement" to "Route 57/60 Confluence Chokepoint Relief Program. Reconstruct Grand Avenue Overcrossing. Reconstruct northbound SR-57 connector to eastbound SR-60. Construct eastbound SR-60 bypass off-ramp to Grand Avenue. Construct southbound Grand Avenue loop entrance ramp to eastbound SR-60. Construct Grand Avenue to eastbound SR-60 entrance ramp. Reconstruct the Diamond Bar Golf Course tunnel and golf course. Reconstruct Diamond Bar Boulevard entrance ramp to eastbound SR-60. ADDING ROW & CONSTRUCTION."</p> <p>2. Change completion date from 2028 to 2026.</p>
Caltrans	101002	LA0G1511							\$347,500	\$24,649		<p>No comment.</p>	<p>1. Change lead agency listed from Metro to Caltrans.</p>
LOS ANGELES COUNTY MTA (METRO)	11635005	LA0G1453		91	ATLANTIC AVE	CHERRY AVE	11.85	13.35	\$83,923	\$84,878	2024	<p>1. Change RTP ID from 1M1003 to 11635005.</p> <p>2. Change project cost from \$84,878 to \$8,349.</p> <p>3. Change project description from "EB SR-91 Atlantic Ave to Cherry Ave. Add one eastbound auxiliary lane from I-710 ramps at Atlantic Avenue to past Cherry Avenue undercrossing." to "Add one eastbound auxiliary lane from I-710 ramps at Atlantic Avenue to past Cherry Avenue undercrossing."</p>	<p>1. Change project description from "Addition of one auxiliary lane in the eastbound direction, extending the outside #5 lane beyond the Atlantic Ave EB off ramp to Cherry Ave, then dropping it before the Cherry Ave. undercrossing, widening the Orange Ave. and Walnut Ave. undercrossing, and potential reconfiguration of local interchanges." to "Add one eastbound auxiliary lane from I-710 ramps at Atlantic Avenue to past Cherry Avenue undercrossing."</p>
LOS ANGELES COUNTY MTA (METRO)	11635006	LA0G1454		91	CENTRAL AVE	NB I-710 to WB SR-91 connector	9.8	9.8	\$49,000	\$50,697	2024	<p>1. Change project description from "SR-91 Central Ave Interchange Improvements Proposed improvements would reconfigure Central Ave. interchange to a modified DDI (diverging diamond interchange)." to "SR-91 Central Ave Interchange Improvements Proposed improvements would reconfigure Central Ave. interchange to a modified DDI (diverging diamond interchange). Project falls under LA0G1563 scope."</p>	<p>1. Change RTP ID from 11635006 to 1M1003.</p> <p>2. Change project cost from \$49,000 to \$50,697.</p> <p>3. Change project description from "Proposed improvements would reconfigure Central Ave. interchange to a modified DDI (diverging diamond interchange)." to "SR-91 Central Ave Interchange Improvements Proposed improvements would reconfigure Central Ave. interchange to a modified DDI (diverging diamond interchange). Project falls under LA0G1563 scope."</p>

Metro Highway Program Projects - Formal Comments - Draft Connect SoCal 2020 RTP/SCS Project List

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							From	To				FTIP Projects (Starting on page 2) Comment	Financially-Constrained RTP/SCS Projects (Starting on page 117) Comment
LOS ANGELES COUNTY MTA (METRO)	11635007	LA0G1455		91	WILMINGTON AVE	NB I-710 to WB SR-91 connector	8.4	9.8	\$49,000	\$42,000	2023	<p>1. Change project description from "SR-91 Wilmington Ave. Interchange Proposed improvements would reconfigure Wilmington Ave. interchange to a modified DDI (diverging diamond interchange)." to " SR-91 Wilmington Ave. Interchange Proposed improvements would reconfigure Wilmington Ave. interchange to a modified DDI (diverging diamond interchange). This project is a portion of parent project, FTIP ID# LA0G1563 which includes the capacity components."</p> <p>2. Change post miles from 8.4-9.8 to 9.16-9.16.</p>	<p>1. Change RTP ID from 11635007 to 1M1003.</p> <p>2. Change project description from "Proposed improvements would reconfigure Wilmington Ave. interchange to a modified DDI (diverging diamond interchange)." to "SR-91 Wilmington Ave. Interchange Proposed improvements would reconfigure Wilmington Ave. interchange to a modified DDI (diverging diamond interchange). This project is a portion of parent project, FTIP ID# LA0G1563 which includes the capacity components."</p>
LOS ANGELES COUNTY MTA (METRO)	11635012	LA0G1119		91	605 PM 5.0 /91 PM 16.9	605 PM 5.8 / 91 PM 19.8	16.9	19.8	\$187,800	\$187,800	2025	<p>1. Change project cost from \$187,800 to \$174,800.</p> <p>2. Change project description from "WB SR-91 improvement Project – Alondra Blvd to Shoemaker Ave Add general purpose lane, auxiliary lanes, on/off ramp improvements. The Westbound State Route 91 (SR-91) Improvement Project (project) proposes to widen and improve approximately 4 miles of freeway along westbound SR-91 between approximately Shoemaker Avenue and Interstate 605 (I-605) interchange. The study area includes westbound SR 91 and northbound I-605 and traverses the cities of Cerritos and Artesia. The project includes the Build Alternative with the design option for the Reduced Lane/Shoulder Width and the design option for Pioneer Boulevard Westbound Ramps/168th Alignment which proposes to align the SR-91 westbound ramps with 168th Street in Artesia at the Pioneer Boulevard interchange. This design option would create a four-legged intersection with Pioneer Boulevard as the north and south legs, the westbound ramps as the east leg, and 168th Street as the west leg." to "Improvements consist of adding an additional general purpose lane and on/off ramp improvements."</p>	<p>1. Change project cost from \$187,800 to \$174,800.</p> <p>2. Change project description from "WB SR-91 improvement Project – Alondra Blvd to Shoemaker Ave Add general purpose lane, auxiliary lanes, on/off ramp improvements. The Westbound State Route 91 (SR-91) Improvement Project (project) proposes to widen and improve approximately 4 miles of freeway along westbound SR-91 between approximately Shoemaker Avenue and Interstate 605 (I-605) interchange. The study area includes westbound SR 91 and northbound I-605 and traverses the cities of Cerritos and Artesia. The project includes the Build Alternative with the design option for the Reduced Lane/Shoulder Width and the design option for Pioneer Boulevard Westbound Ramps/168th Alignment which proposes to align the SR-91 westbound ramps with 168th Street in Artesia at the Pioneer Boulevard interchange. This design option would create a four-legged intersection with Pioneer Boulevard as the north and south legs, the westbound ramps as the east leg, and 168th Street as the west leg." to "Improvements consist of adding an additional general purpose lane and on/off ramp improvements."</p>
LOS ANGELES COUNTY MTA (METRO)	11635008	LA0G1456		60	SR-60/7th Avenue Interchange PM R14.3	SR-60/7th Avenue Interchange PM R14.3			\$21,000	\$23,075	2024	<p>1. Change RTP ID from 1ALD4 to 11635008.</p> <p>2. Change project description from "SR-60/7th Avenue Interchange Improvement Project" to "Improve 7th Avenue off ramp at WB SR-60. Reconfigure on and off ramps to improve mobility and freeway/arterial operations."</p>	<p>1. Change project cost from \$21,000 to \$23,075.</p>
FOUND IN "FINANCIALLY-CONSTRAINED RTP/SCS" LIST, NOT IN "FTIP PROJECTS" LIST													
LOS ANGELES COUNTY MTA (METRO)	11625010			I-5	SR-14	Kern County Line			\$373,100		2039	<p>1. Delete project. Project exists as FTIP ID # LA0G440.</p>	<p>1. Delete project. Project exists as FTIP ID # LA0G440.</p>
LOS ANGELES COUNTY MTA (METRO)	11625013			Various	0	0			\$223,976		2040	<p>Not applicable.</p>	<p>1. Change Lead Agency from Los Angeles County MTA (METRO) to City of Long Beach.</p>

Metro Highway Program Projects - Formal Comments - Draft Connect SoCal 2020 RTP/SCS Project List

Lead Agency	RTP ID	FTIP ID	Project Title	Route Name	From	To	Postmiles		RTP Project Cost	FTIP Project Cost	Completion Year	Highway Program Formal Comment	
							From	To				FTIP Projects (Starting on page 2) Comment	Financially-Constrained RTP/SCS Projects (Starting on page 117) Comment
SOUTH BAY COUNCIL OF GOVERNMENTS	1M1003			91/105/110/405					\$1,508,900		2016	Not applicable.	1. Lead agency should update the completion year.
LOS ANGELES COUNTY MTA (METRO)	11625014			Various	0	0			\$191,649		2032	Not applicable.	1. Metro is not the lead agency. Metro is the sponsoring agency.
LOS ANGELES COUNTY MTA (METRO)	11625016			Various	0	0			\$1,066,554		2040	Not applicable.	1. Metro is not the lead agency. Metro is the sponsoring agency.
LOS ANGELES COUNTY MTA (METRO)	1H0101			SR-14	Ave. P-8	Ave. L			\$120,000		2027	Not applicable.	1. Metro is not the lead agency. 2. Move project to Strategic Projects list.
LOS ANGELES COUNTY MTA (METRO)	1H0103			I-5/I-405	South	North			\$330,000		2029	Not applicable.	Robert: check with Metro Planning re: project responsible agency and project details.

Metro Highway Program Projects - Formal Comments - Draft Connect SoCal 2020 RTP/SCS Project List

Lead Agency	RTP ID	FTIP ID	Project Title	Route Name	From	To	Postmiles		RTP Project Cost	FTIP Project Cost	Completion Year	Highway Program Formal Comment	
							From	To				FTIP Projects (Starting on page 2) Comment	Financially-Constrained RTP/SCS Projects (Starting on page 117) Comment
LOS ANGELES COUNTY MTA (METRO)	1M1002			I-710					\$711,600		2022	Not applicable.	1. Delete project. Project exists as RTP ID# LA08952 & FTIP ID # LA08952.
FOUND IN "FTIP PROJECTS" LIST, NOT IN "FINANCIALLY-CONSTRAINED RTP/SCS" LIST													
LOS ANGELES COUNTY MTA (METRO)		LA0G440		I-5	SR-14	Parker Road	45.4	59.5		\$539,200	2024	1. Change project cost from \$539,200 to \$679,630.	Not applicable.
LOS ANGELES COUNTY MTA (METRO)		LA0G1563		91	Central Avenue	Acacia Avenue	8.4	9.8		\$180,000	2024	1. Change project description from "Add auxiliary lane between gore points, improving interchanges westbound from Acacia Avenue to Central Avenue. Project scope includes FTIP projects LA0G1454 and LA0G1455." to "improve the weaving conflict on SR-91 between Central Avenue to Acacia Court by adding a two lane C-D road in each direction. Project includes proposed improvements to the truck turning radii at SR-91 Wilmington Avenue and Central Avenue Interchanges." 2. Change post miles from 8.4-9.8 to 7-11.04. 3. Change project cost from \$180,000 to \$20,455.	Not applicable.
LOS ANGELES COUNTY MTA (METRO)		LA0G1562		405	Artesia Blvd	I-405/I-105 Separation	16.4	21.2		\$70,000	2026	1. Change project cost from \$70,000 to \$18,534.	Not applicable.

Metro Highway Program Projects - Formal Comments - Draft Connect SoCal 2020 RTP/SCS Project List

Lead Agency	RTP ID	FTIP ID	Project Title	Route Name	From	To	Postmiles		RTP Project Cost	FTIP Project Cost	Completion Year	Highway Program Formal Comment			
							From	To				FTIP Projects (Starting on page 2) Comment		Financially-Constrained RTP/SCS Projects (Starting on page 117) Comment	

Agustin Barajas

From: Lee, Steven [REDACTED]
Sent: Monday, December 30, 2019 2:46 PM
To: Agustin Barajas
Cc: Yamarone, Mark; [REDACTED] Chio, Man San (Vincent); Balderrama, Brian
Subject: RE: SCAG RTP Project List Comments

Hi Augustin,

As mentioned, the following is the revision needed for RTP ID 7120010 project description:

“Phase A would include construction of the full viaduct structure over the US-101 freeway that accommodates up to nine (9) new run-through tracks with two (2) run-through tracks in the interim, track, signal and communication work in the throat area, run through platform, quiet zone ready improvements at Main Street grade crossing and active transportation improvements.”

Please let us know if there is a character limit and we can revise the description.

Thank you,

Steven T. Lee

LA Metro

Manager, Transportation Planning

Long Range Planning

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Metro’s mission is to provide world-class transportation for all.

From: Lee, Steven
Sent: Thursday, December 26, 2019 2:34 PM
To: Agustin Barajas [REDACTED]
Cc: Yamarone, Mark; Lum, Rena [REDACTED]
Subject: SCAG RTP Project List Comments

Hi Augustin,

Please see attached spreadsheets for project change submittals. All changes are in red, and for Highway projects, please refer to the RTP comments on the far right column. There are some Strategic Unfunded project changes in separate tabs of the spreadsheet. We are still waiting for Regional Rail to submit their changes and will forward to you once we receive and review. Please do not hesitate to contact me if you have any questions regarding this matter.

Also, the attached PDF is a page from SCAG’s Connect Social doc for Transit Capital Projects. Could you please verify who the project sponsors are for the two projects in question:

- Red Line Extension to Hollywood Burbank Airport
- Los Angeles Slauson Light Rail – Crenshaw/LAX Transit Corridor to Blue Line

These are not Metro funded projects.

Thank you,

Steven T. Lee

LA Metro

Manager, Transportation Planning

Long Range Planning

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Metro's mission is to provide world-class transportation for all.

Agustin Barajas

From: Lee, Steven [REDACTED]
Sent: Thursday, January 9, 2020 2:36 PM
To: Agustin Barajas
Cc: Yamarone, Mark; [REDACTED]; Liu, Ying-Hsiu (Jill)
Subject: Fwd: Grade Sep add to RTP Strategic Plan

Hi Agustin,

Could you please include the project described below to be included in the Unfunded Strategic list in the RTP?

Thank you,

Steven T. Lee
 LA Metro
 Manager, Transportation Planning
 Long Range Planning
 [REDACTED]

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Metro provides excellence in service and support.

Begin forwarded message:

From: "Liu, Ying-Hsiu (Jill)" [REDACTED]
Date: January 9, 2020 at 11:30:53 AM PST
To: "Lee, Steven" [REDACTED]
Cc: "Lum, Rena" [REDACTED]; "Yamarone, Mark" <[REDACTED]>;
 "Roybal, Dolores" <[REDACTED]>; "Mieger, David" <[REDACTED]>
Subject: RE: Grade Sep add to RTP Strategic Plan

Steven:

Here is the information for the Centinela project.

County:	Los Angeles County
System	Local Highway/Arterial
Project Title:	Centinela Florence Grade Separation
Project Description/Scope:	Proposed Grade Separation of the Crenshaw/LAX light rail transit line at the intersection of Centinela Avenue and Florence Avenue
Project Location:	This crossing within one-quarter mile of the Crenshaw/LAX line Downtown Inglewood station and 1.5 miles northwest of the Inglewood NFL Stadium (under construction) and the Hollywood Park Development Area.

Project Finish:	Year 2025 (estimated completion date of construction, pending Board approval for project definition in Spring 2020, project funding availability, and opening date of Crenshaw/LAX line construction)
Lead Agency:	Regional (to be determined, as it will be a joint effort between Metro and the City of Inglewood)
Metro PM:	Dolores Roybal (213) 922-3024

Project is not included in the adopted 2009 LRTP nor in the Measure M Expenditure Plan, and therefore, is currently unfunded. Metro is conducting a 15% conceptual design study to develop design options and cost estimates and conduct targeted stakeholder outreach for this potential project. Metro and the City of Inglewood have on-going discussions on exploring opportunities in state or federal grants and local match funds for this project.

Jill Y. Liu, PTP, ENV SP

LA Metro

Senior Manager

Countywide Planning & Development | Long-Range Planning

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Agustin Barajas

From: Lee, Steven [REDACTED]
Sent: Monday, January 6, 2020 8:30 AM
To: Agustin Barajas
Cc: Yamarone, Mark
Subject: FW: Highway Program - Project List Changes

FYI

Thank you,

Steven T. Lee

LA Metro
Manager, Transportation Planning
Long Range Planning
[REDACTED]

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Metro’s mission is to provide world-class transportation for all.

From: Machuca, Roberto
Sent: Thursday, January 02, 2020 9:17 AM
To: Lee, Steven
Cc: Yamarone, Mark; Chaves, Ernesto; Perucho, Julio
Subject: RE: Highway Program - Project List Changes

Happy New Year Steven,

The RTP IDs listed below are for program amounts designated to subregions (1162S013 – San Gabriel Valley COG, 1162S014 – Las Virgenes Malibu COG and 1162S016 – South Bay COG). Each subregion goes through individual procedures that either; have allocated or will allocate funds from the program amounts to individual projects and their respective city.

Hence our recommendation is that Metro not be listed as the lead, but that COGs/various cities be identified as lead.

If needed, I’m available to discuss and with SCAG to further clarify.
Thanks

Roberto Machuca

Sr. Director
[REDACTED]

Metro’s mission is to provide world-class transportation for all.

From: Lee, Steven [REDACTED]
Sent: Tuesday, December 31, 2019 2:13 PM
To: Machuca, Roberto [REDACTED] >
Cc: Yamarone, Mark [REDACTED] >; Chaves, Ernesto [REDACTED] >
Subject: FW: Highway Program - Project List Changes

Hi Robert,

Could you please help with the lead agency for the projects addressed below?

Thank you,

Steven T. Lee

LA Metro

Manager, Transportation Planning

Long Range Planning



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Metro's mission is to provide world-class transportation for all.

From: Agustin Barajas [Redacted]

Sent: Tuesday, December 31, 2019 12:36 PM

To: Lee, Steven

Subject: Highway Program - Project List Changes

Hi Steven,

For Projects in the Highway Program Public Comment table, RTP ID's 1162S013, 1162S014 and 1162S016, can you provide us with the lead agency? The project input we receive all goes through Metro. We can't designate a lead agency unless it is a regional initiative.

Thanks,



Agustin Barajas
Associate Regional Planner



SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017



CONNECT SoCal

Take the survey. ✓
Attend a workshop. ✓
Get connected. ✓

We need your input to shape SoCal's future! For more info, visit ConnectSoCal.org



Los Angeles County
Metropolitan Transportation Authority

Metro

January 21, 2020

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

Dear Connect SoCal Team:

The Los Angeles Metropolitan Transportation Authority (Metro) appreciates the opportunity to review and comment on the draft Connect SoCal plan.

The Connect SoCal plan aligns closely with many Metro plans and policies, including Metro's Vision 2028 Plan and 2020 Long Range Transportation Plan (LRTP). Collectively, our plans share many of the stated goals of Connect SoCal to improve mobility, accessibility, safety and resiliency of our transportation system while reducing greenhouse gas emissions (GHG) and supporting healthy equitable communities.

As the largest provider of public transportation in the Southern California Association of Governments (SCAG) region, Metro recognizes the critical role we play as a partner in achieving the ambitious GHG and vehicle miles travelled (VMT) reduction targets identified in the Connect SoCal plan. Metro is fully committed to supporting SCAG in reaching these targets through the investment and deployment of mobility solutions.

Cities, through their public engagement processes, land use authority and management of their street network, similarly will be critical to achieving the targets set in the Connect SoCal plan. To this end, Metro recommends that SCAG consider a more robust plan to support cities with SB 743 implementation. As you are aware July 1, 2020 is the statewide implementation date for public agencies to adopt VMT as a metric for identifying and mitigating transportation impacts within CEQA. To date, very few cities in Los Angeles County have adopted the required changes. SCAG should consider providing technical assistance to cities directly, or at the subregional level, regarding the assessment of VMT, the development of thresholds of significance and mitigation measures. A regional approach to SB 743 implementation would not only provide consistency but may also support the further development of a quantifiable set of mitigation measures over time that reliably reduce VMT.

Thank you again for the opportunity to comment. I look forward to our continued collaboration in advancing sustainable mobility strategies throughout the region.

Sincerely,

Kalieh Honish
Executive Officer, Long Range Planning
Metro Countywide Planning & Development

Comment Number	Agency	Dept	Document	Page	Comment
1	LA Metro	Hwy Pro	Draft Plan	10	Consider revising to include "reduced recurrent and non-recurrent congestion" under the Connect SoCal Guiding Principles.
2	LA Metro	Hwy Pro	Draft Plan	10	Consider emphasizing the role and connection between zero-emission/near-zero-emission technologies & reducing GHG emissions.
3	LA Metro	Hwy Pro	Draft Plan	28	Consider breaking out "transit" into bus and rail modes so as to show how much the roadway network is depended on e.g. 3.3% by bus and 0.5% by rail.
4	LA Metro	Hwy Pro	Draft Plan	28, 30, 31, 37, 39	Consider adding sources and years for each slice of data/statistics. Is the "existing" or "now" 2019? Or 2015? Unclear.
5	LA Metro	Hwy Pro	Draft Plan	37	Consider including other reasons for collisions along with their respective percentages. Also consider adding what type of collisions result in fatalities and serious injuries, consistent with MAP-21/FAST Act requirements.
6	LA Metro	Hwy Pro	Draft Plan	38	Consider the future effects of connected and automated vehicles in improving safety.
7	LA Metro	Hwy Pro	Draft Plan	38	Consider adding "strategic" before "complete streets". Not every street within the roadway network is a viable or logical candidate for complete streets concepts.
8	LA Metro	Hwy Pro	Draft Plan	40	Consider adding the date of SB-1 passage (2017).
9	LA Metro	Hwy Pro	Draft Plan	42	Consider adding a source for the claim that "ride-hailing and automated vehicles, will increase VMT and GHG emissions if their business models do not adapt". Both have a possibility of reducing VMT (as first-last mile options) and emissions (zero-emission/near-zero-emission technologies and slipstreaming/platooning). Additionally, consider explaining what their business models are, supporting the claim for their need to adapt, and what they will need to adapt to.
10	LA Metro	Hwy Pro	Draft Plan	48	Revise to read "in areas vulnerable to rising seas."
11	LA Metro	Hwy Pro	Draft Plan	48	This draft plan will be adopted in 2020. Consider adding actual GHG reductions, if any, for the first target year given the goal of 8 percent per capita by 2020.
12	LA Metro	Hwy Pro	Draft Plan	51	Consider adding what trip purposes are associated with the "three miles or less" statistic, why "78 percent of these short trips [three miles or less] are made by driving", and why these trips may not be able to be effectively accommodated by "foot, bicycle, micro-mobility devices and slow speed electric vehicles..."
13	LA Metro	Hwy Pro	Draft Plan	54	Consider explaining why "increased density at nodes along key corridors" is related to "Livable Corridors". Does higher-density development necessarily lead to "Livable Corridors"? Is the concept and definition of "Livable Corridors" universal to all residents within the SCAG region? How is "under-performing auto-oriented retail" defined and substantiated?
14	LA Metro	Hwy Pro	Draft Plan	56	Consider the effect "Parking Requirements Reform" will have on automotive idling, deadheading, and street parking.
15	LA Metro	Hwy Pro	Draft Plan	60	Consider further quantifying the economic benefits and disbenefits of implementing cordon/area pricing.
16	LA Metro	Hwy Pro	Draft Plan	61	Consider adding sources for each study included to support the implementation of user-fees and pricing strategies. Additionally, with the assumed future implementation of user-fees and pricing strategies, will SCAG advocate for the corresponding rescission of gas taxes and SB-1 given their ability to "more easily address the actual cost of driving"?
17	LA Metro	Hwy Pro	Draft Plan	74	Consider adding "Improve economic productivity" and "Increase freight mobility" under the "Focus on adding capacity" bullet point.
18	LA Metro	Hwy Pro	Draft Plan	76	Consider adding I-710 Corridor Project to the list.

19	LA Metro	Hwy Pro	Draft Plan	78	Consider adding "Add strategic highway operational and capacity improvements" under the "Truck Bottleneck Relief Strategy" bullet points.
20	LA Metro	Hwy Pro	Draft Plan	129	Consider the effect that zero-emission/near-zero-emission technologies will have on SB 743 objectives of reducing VMT as a proxy to GHG emissions.
21					
22	LA Metro	Hwy Pro	Goods Movement	72 - 91	For Table 9, please ensure consistency with formal comments submitted on complete project list.
23	LA Metro	Hwy Pro	Tech Report - Highway/Arterials	2	Consider deleting "reduce the number of single occupancy vehicle (SOV) trips on our roadways so that we can" and identify the reduction of SOV trips as a bullet below as a strategy for reducing congestion.
24	LA Metro	Hwy Pro	Tech Report - Highway/Arterials	3	Operational Improvements narrative is not included or discusses, as there are significant advances that are/continue being analyzed and made to improve efficiency and safety of travel trips, which is inclusive of all modes of transportation. Consider including narrative for Operational improvements, may be inclusive of auxiliary lanes, appropriate curb turning radii, sight distance and ramp configuration corrections.
25	LA Metro	Hwy Pro	Tech Report - Highway/Arterials	4	Consider renaming the header "Regional Significance" with Highway and Arterial Regional Significance". This paragraph discusses importance of highway/arterial backbone significance for mobility in LA County. However, after this paragraph there is no mention of highway/arterials, it goes straight to transit and other modes of transportation. Transit and other modes of transportation rely on the highway/arterial infrastructure.
26	LA Metro	Hwy Pro	Tech Report - Highway/Arterials	5	Consider rephrasing or deleting "Active Transportation is low-cost"
27	LA Metro	Hwy Pro	Tech Report - Highway/Arterials	5	Consider rephrasing or deleting "active transportation infrastructure also improve safety for all roadway users"

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Comment Number	Agency	Dept	Technical Document	Page	Comment
1	LA Metro	Hwy Pro	Congestion Management	25	Consider removing the DCCM initiative if it is not in operation.
2	LA Metro	Hwy Pro	Congestion Management	25	<p>Consider revising the sentence on Metro TSP to: "Metro implemented its first Metro Rapid lines in 2000 that use transit signal priority (TSP) technology in City of Los Angeles and other agencies in Los Angeles County"</p> <p>Metro TSP is not only provided by ATSAC, but by other agencies in Los Angeles County. In addition, other transit agencies in the Los Angeles County primarily use Metro's TSP (known as Metro Countywide Signal Priority) standards. Please contact Eva Moon, Metro Countywide Signal Priority Program Manager at PanMoonE@metro.net, for further information.</p>
3	LA Metro	Hwy Pro	Congestion Management	25	Consider revising the sentence regarding TMCs: "In addition, the four Caltrans Districts (7,8,11, and 12) and most medium to large sized jurisdictions have Traffic Management Centers (TMCs) to monitor its traffic signal systems and ITS devices, and to manage natural and manmade disasters if that need were to arise."
4	LA Metro	Hwy Pro	Congestion Management	25	Didn't SCAG update its Regional ITS Architecture in 2018? The last update in the text said 2011.
5	LA Metro	Hwy Pro	Congestion Management	25	<p>Please note that "Connect-IT" is Metro's/Los Angeles County ITS Architecture. It is not just a website, but the ITS Architecture available via website. Consider revising:</p> <p>"A more exhaustive list of ITS Examples in the SCAG region can be found in county's ITS Architectures. For example, Los Angeles County's ITS Architecture, named "Connect-IT", has been updated and posted on a website for easier access to agencies."</p>
6	LA Metro	Hwy Pro	Congestion Management	26	Traffic Signal Priority/Preemption: This section sounds more "preemption" than priority. This section needs to separate "Transit Signal Priority" and Signal Preemption to not confuse the readers of the two strategies.
7	LA Metro	Hwy Pro	Congestion Management	26	Typo on acronym: "STSP" should be "TSP"
8	LA Metro	Hwy Pro	Congestion Management	27	Instead of focusing on ATSAC, this bullet point should focus on "Central Traffic Control Systems" since most counties and cities in the SCAG region have these systems in place, not just LADOT.
9	LA Metro	Hwy Pro	Congestion Management	27	May want to include County of Los Angeles Information Exchange Network (IEN) as an Arterial, Highway and Freeway ITS Strategy. Several Los Angeles County agencies are connected to IEN to share traffic control data. Please contact Eva Moon, Metro IEN Project Manager at PanMoonE@metro.net, for further information.
10	LA Metro	Hwy Pro	Congestion Management	28	Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.
11	LA Metro	Hwy Pro	Congestion Management	29	Roadways: This section is titled "Roadways", however, it discusses more the freeway system and how information is fed to Caltrans and CHP TMC. There are other agencies and jurisdictions that operate and maintain TMCs along roadways and freeways. Consider changing this section to reflect both the local roadways and freeways.
12	LA Metro	Hwy Pro	Congestion Management	29	Transit: Other transit operators that have TSP on local lines, and are not necessarily "Rapid Lines". Consider removing "Rapid lines" or differentiating between "local" and "rapid". Metro and Torrance Transit are "rapid", Foothill Transit and Culver City Bus is "local"
13	LA Metro	Hwy Pro	Congestion Management	29	Please add G-Trans (Gardena) and Pasadena Transit to the list of TSP (in development) as local lines. These agencies are using Metro's signal priority standards.

					Table 4: Metro project. Please remove FRATIS Expansion and replace with the following: "Drayage, Freight, and Logistics Exchange (DRAYFLEX) - Development of a goods movement optimization tool to improve container movements. In addition, the development of a freight travel application for real-time route guidance and congestion alerts."
14	LA Metro	Hwy Pro	Congestion Management	34	Project Status - Existing, Timeframe: Short
15	LA Metro	Hwy Pro	Congestion Management	37	Table 4: RIITS should be "Existing" and not "Planned" In addition, RIITS should be included in the body of the text in this document. Consider adding RIITS to the Arterial, Highway, and Freeway ITS Strategies section. Please contact Kali Fogel, RIITS Program Manager, at fogelk@metro.net to verify the language.
16	LA Metro	Hwy Pro	Highways and Arterials	15	Integrated Corridor Management: Please consider adding towards the end of the paragraph as Metro has completed a regional study for future ICM strategies. "Metro prepared the Regional ICM Assessment that analyzed all freeways and adjacent arterials in Los Angeles County for potential ICM implementation. This study is being further evaluated by Caltrans District 7 for prioritization of future ICM corridors."
17	LA Metro	Hwy Pro	Highways and Arterials	17	I-105 ATM Congestion Relief Analysis Study (2014): With the I-105 Expresslane in the environmental phase, it is highly unlikely that the I-105 ATM strategies would be implemented based on the footprint of the Expresslanes project.
18	LA Metro	Hwy Pro	Highways and Arterials	26	Adaptive Traffic Control Systems: This section tends to focus on Caltrans, when other local agencies have deployed adaptive systems with different vendors. Caltrans and LADOT are running the same adaptive system. Other agencies have deployed adaptive systems from other vendors like Econolite and McCain. This section may want to focus more on the overall concept of Adaptive Traffic Control, as well as Traffic Responsive Strategies, and mention Caltrans and LADOT as implementers. In addition, the statistics shown for the benefits of ATCS are over 10 years old. With traffic volumes increasing, are these numbers still accurate?
19	LA Metro	Hwy Pro	Emerging Technologies	2	Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.
20	LA Metro	Hwy Pro	Emerging Technologies	9	Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.
21	LA Metro	Hwy Pro	Emerging Technologies	9	Consider renaming "Advanced ITS" to just "Connected Vehicles"
22	LA Metro	Hwy Pro	Emerging Technologies	19	Consider renaming "Advanced ITS" to just "Connected Vehicles"
23	LA Metro	Hwy Pro	Emerging Technologies	19	Advanced ITS: Please remove the projects being conducted by Metro. Some of these are conventional traffic engineering practices and ITS strategies.
24	LA Metro	Hwy Pro	Emerging Technologies	19	Advanced ITS: Please replace with: "Some of the projects conducted by Metro and local agency partners include: Drayage, Freight, and Logistics Exchange (DrayFLEX); Signal Phase and Timing (SPaT) pilot demonstrations (Eco-Drive, Metro OrangeLine); Partial Automation of Truck Platooning; and Predictive Data-Driven Vehicle Dynamics and Powertrain Control."
25	LA Metro	Hwy Pro	Emerging Technologies	19	Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.
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29	LA Metro	Hwy Pro	Goods Movement	90	Table 9: Goods Movement Project List - Please remove I-105 ICM/ATM Elements from the list as this is not a Goods Movement project. This project will be led by Metro.
30	LA Metro	Hwy Pro	Goods Movement	90	Table 9: Goods Movement Project List - Please update FRATIS to DrayFLEX. DrayFLEX is a Metro-led project. FRATIS is an old program from Federal Highway Administration.
31	LA Metro	Hwy Pro	Transit	52	The paragraphs and language that describe Metro and LADOT TSP are not accurate and needs to be updated. Please contact Eva Moon, Metro Countywide Signal Priority Program Manager at PanMoonE@metro.net, to clarify the technologies between the two systems.

Connect SoCal Plan

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Natural Lands Coalition Comments on 2020 Natural & Farmland Policies

January 23, 2020

Submitted through the Connect SoCal website:

<https://www.connectsocial.org/Pages/Connect-SoCal-Comment-System.aspx>

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

RE: Comments on the 2020 Draft Connect SoCal

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) called Connect SoCal. In 2012, with release of that RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and associated policies within the SCAG plan. This 2020 Coalition was specifically formed to focus on the natural and farmland policies within Connect SoCal and the associated Natural and Farmland Appendix. This year, the Coalition is more diverse, more inclusive, and more geographically distributed than the 2012 and 2016 Coalitions—**with every county being represented. Our 48-member alliance includes unincorporated community groups at the local level all the way up to national conservation non-profits.**

We are pleased to see SCAG advancing the preservation of natural and farmlands by including it as one of the 10 goals for the plan for the first time in your organization's 55-year history. We believe this is a step in the right direction. We've reviewed the RTP/SCS and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify or strengthen the language in Plan and/or the Appendix, as well as link the goals of the RTP to SCAG's aim of reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT).

SUCCESSSES SINCE 2016 AND LOOKING AHEAD

Much work has been done over the last four years by the SCAG and consultants as it relates to the Natural and Farmlands Program—thanks to the staff's attention and the continued efforts of the Working Group. We are excited to see The Nature Conservancy begin its work to develop a six-county wide GreenPrint that focuses on important natural resource, climate, and risk areas. We stand ready to assist in this effort when the need arises.

SCAG has a tremendous opportunity with the 2020 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 sequester carbon. Further, most greenfield developments are at the urban fringe—far from services, transit, and amenities, thus increasing both GHG emissions and VMTs. Preservation of those fringe greenfield 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.

Further, we appreciate SCAG’s recognition of areas that should not be developed. Specifically, the language on Page 47 that states Connect SoCal will “de-prioritize growth on lands that are vulnerable to wildfire, flooding and near term sea-level rise.” Building in locations with these significant vulnerabilities ignores public safety, the human and financial costs, and the realities that face our region.

Much of the last four years has been spent researching, gathering and vetting the data, surveying local jurisdictions, and preparing for the regional GreenPrint. 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 natural resource agencies to now transition to actually implementing conservation activities. This is your opportunity to walk the walk, instead of simply talking about it. Again, we stand ready to help conserve land throughout Southern California for the benefit of its millions of residents.

CHAPTER 2: SOCAL TODAY

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, and does not build on greenfield sites or high risk areas (like those prone to wildfires or sea level rise).

We concur with the Plan’s conclusion that our natural and farmlands are under severe development pressure. However, it worth noting that for every dollar invested in conserving natural lands, an estimated \$2.37 is generated through local sales, recreation purchases, gas, and snack/food purchases from outdoor enthusiasts. Therefore, conservation is an economic pump too.

We agree that many counties and cities have done commendable activities to preserve natural and farmlands within the region. However, one key element missing from this equation is the conservation community. There are scores of non-profits, community groups, and land trusts that have preserved thousands upon thousands of acres across the Southland. Acknowledgement of the contributions of the non-profit world have been completely omitted from the SoCal Connect Plan. And, as you know, the mission of our cities and counties is not to protect land, and that’s why the need for the conservation non-profits is so important. Please don’t ignore our work.

Further, it seems rather naïve to believe that plans and policies preserve habitats or farmlands over the long term as the document indicates (Page 36). Plans and policies change at the whim of the elected body. The only way to have land permanently preserved is through acquisition, easements, or enrolling it in a state/federally adopted Conservation Plan.

CHAPTER 3 – A PATH TO GREATER ACCESS, MOBILITY & SUSTAINABILITY

On page 47, the Plan notes that regional challenges are being addressed to identify opportunities and barriers to development. Since conservation is now in the top 10 goals, we'd ask that you also identify the opportunities and barriers to conservation.

For example, the strategies identified in the document to promote a Green Region could be expanded to include Enhanced Infrastructure Finance Districts (EIFD). EIFDs can also be used to conserve natural lands—open space is part of the public infrastructure as well as roads, libraries, and transit centers—all of which provide a community-wide benefit.

CHAPTER 5 – MEASURING OUR PROGRESS

Within Chapter 5, the document concludes that greenfield development can be reduced by 36% (Page 118 and 128) by focusing development in higher density areas where infrastructure already exists. We agree, in part. Some formal conservation action needs to occur to those greenfield properties in order to permanently protect them (such as through acquisition or a conservation easement), otherwise the can is being kicked down the proverbial road where a new development project will be proposed for that greenfield land in the future.

NATURAL AND FARMLAND APPENDIX

Policies

There are five policies included in the Appendix specifically related to natural and farmlands. On the whole, we are disappointed that three of the policies (3, 4, and 5) are repeated from the 2016 Plan. This implies that no progress has been made on them. If this is true, reflecting on the reasons for the lack of progress may be beneficial before suggesting a repeat of the same policies. Alternatively, adding language that implies forward progress would be an improvement.

That said, the Natural Lands Coalition supports the inclusion and intent of natural and farmland policies, but offers the following suggestions on the existing policy language:

Additions shown as *italics*

Deletions shown as ~~striketrough~~

Policy #1 – Continue to Engage Stakeholders

We support expanding and deepening relationships and would suggest SCAG focus on innovative conservation acquisition, restoration, and funding activities being done throughout the state for inclusion in future Natural and Farmland Working Group meetings. For example, the creation of the Martis Fund near Lake Tahoe. The Fund's primary role is managing and dispersing financial resources raised in connection with real estate sales at Martis Camp. The mission of the Fund is to support programs to conserve open space; manage and restore habitat and forest lands; and promote opportunities for workforce housing and related community purposes in the Martis Valley region. Other examples, are the use of EIFDs to fund conservation projects locally as part of the community-wide benefit or public-private partnerships to conserve and restore lands, like the newly created Los Cerritos Wetlands Fund.

Therefore, we propose the following language be added to the first policy:

- *Provide substantive examples of conservation funding, public-private partnerships, and policies that promote adding lands into protected status, improving the ecological integrity of the land, and helping finance transactional and long-term management costs.*

Policy #2 – Develop Regional GreenPrint

This is a great next step to the 2016 Plan and we support this policy as is.

Policy #3 – Encourage Advance Mitigation Programs

This is a repeated policy from 2016's Plan. No new transportation measures have been adopted since the last Plan, and based on the Connect SoCal document (Pages 99 and 100), all of the eight already adopted transportation measures have decades to go before they will sunset or be considered for renewal. Meanwhile other infrastructure projects and programs being developed could include a Regional Advance Mitigation Program (RAMP). Those opportunities need to be considered early (i.e., prior to adoption). Looking forward at other possible ways RAMPs can be included regionally would be a step forward—as opposed to repeating the same goal as 2016.

Consequently, we propose the following language be added to the third policy:

- *Engage with agencies developing infrastructure plans to promote the inclusion of a RAMP prior to adoption.*

Further, it is unclear how the RAMP initiative will “support long-term management and stewardship of mitigated properties.” In most instances, the lands acquired or restored are part of a Natural Community Conservation Plan and/or Habitat Conservation Plan and as such are required to provide a non-wasting endowment that covers stewardship, access, emergencies, and changed circumstances.

Unless it is clarified and because this can be misconstrued as providing financial, management, or ownership support, we suggest deleting the sentence:

- ~~The initiative will also support long-term management and stewardship of mitigated properties.~~

Policy #4 – Align with Funding Opportunities and Pilot Programs

This is a repeated policy from 2016's Plan. How can this policy be reframed to be more future oriented? As mentioned above, local agencies are certainly not the only ones seeking funds for conservation activities—and sometimes conservation is not the local agency's priority at all. Additionally, if we continue to “seek planning funds” conservation goals *may never be achieved*. We don't have time to lose as development pressures continue to threaten important landscapes.

Consequently, we propose the following language be modified in the fourth policy:

- SCAG aims to help local agencies *and non-governmental organizations* seek planning ~~and implementation funds grants, such as including, but not limited to Cap-and-Trade auction proceeds that could advance help prepare for local action on acquisition and restoration projects locally and regionally.~~

We suggest the following language be included at the end of the sentence above:

- *Support, such as letters and testimony, for agencies and non-governmental organizations applying for local, regional, state or federal funding to preserve lands through willing-seller acquisitions or by restoring ecosystems to their native habitat.*

Further, the policy focuses on Pilot Programs and yet no commitment is made to that end. What exactly will SCAG do to launch a Pilot Program related to conservation of our natural and farmlands? Since we are unclear as to the intent, either the title needs to be adjusted or the policy language needs to be modified to capture the intent.

Policy #5 – Provide Incentives for Jurisdictions to Work Across County Lines

This is a repeated policy from 2016’s Plan. We’d like to understand how this policy can be reframed in terms of a “next step” for the 2020 Plan. Since the 2016 Plan, SCAG has publicly supported the Liberty Canyon Wildlife Bridge in Los Angeles County, and also benefiting Ventura County. Since then, several critical wildlife corridors are even more threatened with development pressure including the Pechanga Corridor in Riverside County, which if it lost to development, could impact conserved lands in Los Angeles, Orange, San Bernardino, Riverside and San Diego Counties. Additionally, the San Bernardino Mountain – San Jacinto Mountain connection across the 10 Freeway impacts multiple landscapes as well.

We suggest the following language be included at the end of the fifth policy:

- *Working collaboratively across jurisdictions with multiple agencies and stakeholders to identify the most important wildlife corridors is essential.*

New Opportunities

We were pleased to see the new section “Opportunities” in the Appendix. Based on the FY2020-2021 Governor’s Budget, it appears some funding is available statewide for natural lands in either the Cap and Trade funds or the Climate Resiliency Bonds. However, the Greenhouse Gas Reduction Fund is only one source and it isn’t a reliable funding source for conservation. Consequently, we hope SCAG considers bolstering this section to include other funding partners such as the Wildlife Conservation Board, California Department of Parks and Recreation, the Coastal Conservancy, Rivers and Mountains Conservancy, Coachella Valley Mountains Conservancy, etc. and their associated grant programs.

Our natural lands are among the most unique in the world. As a global hotspot of biodiversity—where our landscapes and the plants and animals in them are threatened with urbanization—time is of the essence to take action. We recognize the many co-benefits that come with land conservation, such as recreational opportunities, outdoor education, improved water quality, preservation of cultural resources, protection of habitat for threatened and endangered species, etc. And, similarly, preservation of our agricultural lands has many co-benefits as well, such as wildlife movement areas, pollinator habitat, local food supply, and 4-H type activities.

We individually and collectively offer our assistance to SCAG as this process unfolds and as the Plan is considered for adoption. Similar to the letter submitted in 2016 from the Coalition, we urge SCAG to consider implementing a program like the One Bay Area Grant program to align

conservation and development priorities across the region. Details have been included of that language as an enclosure.

Again, thank you for the opportunity to comment and provide substantive input. Should you have any questions, please reach out to this coalition coordinator, Melanie Schlotterbeck of Friends of Harbors, Beaches and Parks at 714-779-7561.

Sincerely,

Amigos de Bolsa Chica • Amigos de los Rios • Ballona Wetlands Land Trust • Banning Ranch Conservancy • Bolsa Chica Land Trust • California Chaparral Institute • California Cultural Resource Preservation Alliance • California Native Plant Society - Orange County Chapter • California Wildlife Foundation/California Oaks • Center for Biological Diversity • Coachella Valley Waterkeeper • Defenders of Wildlife • Diamond Bar-Pomona Valley Task Force of the Sierra Club • Endangered Habitats League • Fallbrook Land Conservancy • Friends of Coyote Hills • Friends of Harbors, Beaches and Parks • Friends of Whittier Hills • Hills For Everyone • Hobo Aliso Task Force of the Sierra Club • Huntington Beach Tree Society, Inc. • Inland Empire Waterkeeper • Laguna Ocean Foundation • League of Women Voters of Orange Coast • Los Angeles, Santa Monica Chapters of the California Native Plant Society • Los Cerritos Wetlands Land Trust • Natural Resources Defense Council • Naturalist For You - Santa Ana Mountains Wild Heritage Project • Orange Coast River Park • Orange County Interfaith Coalition for the Environment • Orange County League of Conservation Voters • Orange County Coastkeeper • Pomona Valley Audubon Society • Puente-Chino Hills Task Force of the Sierra Club • Residents for Responsible Desalination • Responsible Land Use (Diamond Bar) • Rio Hondo Group of the Sierra Club • Rural Canyons Conservation Fund • Saddleback Canyons Conservancy • Sea and Sage Audubon • Surfrider - Newport Beach Chapter • Surfrider - South Orange County Chapter • Surfrider LA • The Trust for Public Land • Tri-County Conservation League • Ventura Land Trust • Wild Heritage Planners • Women 4 Orange County

Attachment: 1 – Plan Bay Area 2040 Description (*Excerpt from 1/29/16 Coalition Letter*)

ATTACHMENT 1 – Excerpt from the January 29, 2016 Coalition Letter

An Implementation Example of a Multi-County Conservation Program

The Bay Area's Metropolitan Transportation Commission (MTC) spans nine counties. The Commission plans, invests, and coordinates to ensure a mobile, sustainable, and prosperous Bay Area. Through a creative partnership with the Association of Bay Area Governments (ABAG) a program called "Plan Bay Area 2040" was developed to promote conservation and infill projects simultaneously. Plan Bay Area allows cities and counties to plan for transportation needs and preserve the character of its communities while accommodating future population growth.

The Plan anticipates population growth of over two million people, one million jobs and more than 650,000 housing units over the next 30 years. Because of Plan Bay Area, two types of priority areas were identified. First, Priority Development Areas (PDAs) are areas designated by local jurisdictions to be appropriate for residential or commercial development. These are infill development sites located near transit. Eighty percent of the anticipated growth in this Plan will happen in the PDAs. Second, Priority Conservation Areas (PCAs) were created based on consensus and with local assistance from the regional non-profit Greenbelt Alliance. PCAs include four designations: Natural Landscapes, Agricultural Lands, Urban Greening, and Regional Recreation. These greenfield lands are in need of protection due to urban development pressures. Each designation type has an instrumental role in supporting the region's natural systems, rural economy, and human health.

To fund this work, MTC created the One Bay Area Grant program. It essentially aligns the MTC investments with support for focused growth—it is both a regional and county program. One Bay Area Grants allow MTC to meet its regional transportation priorities while simultaneously advancing the region's land use and housing goals. The Grant program targets investment in PDAs and rewards cities that (1) approve new housing construction, and (2) accept allocations through the Regional Housing Needs Assessment process. The rewards come in the form of funds to allow other conservation-focused investments, such as the permanent protection of PCAs.

In 2013, funded through federal dollars made available to MTC and additional funds from the State Coastal Conservancy), 23 PCA projects were funded totaling nearly \$12 million. For use in 2018, MTC has already authorized \$16.4 million for PCA funding with an anticipated call for projects in early 2017. The PCAs are also eligible for other sources of local, regional, state, and federal funding to leverage the MTC One Bay Area Grant program dollars.

SCAG with its natural lands and infill focus is uniquely situated to replicate this type of program for the Southern California region. Much of the baseline work of understanding where the high value habitat areas are located has already been completed since the 2016 RTP/SCS. While there continue to be other filters that can inform decisions, SCAG has a nearly complete Regional Conservation Plan that could be used to launch a similar program here. Additionally, the majority of development sites targeted for the anticipated population growth here are less than a mile from transit. This piece is also already in place. The Southern California Conservation Coalition wholly supports this type of unique program and funding mechanism to achieve both

compact infill developments where transit and employment centers already exist, while simultaneously funding conservation work to protect greenfield sites at the fringe (where less dense, more auto-dependent, and fire-prone development pressures exist).

While we recognize that MTC is both a Metropolitan Planning Organization and a regional transportation agency for the nine-Bay Area Counties and has taxing authority, it is actually utilizing federal funds to meet the needs of the grant program. We believe SCAG could also use federal funds and other state funding sources to create such a program. This is an opportunity for creative and innovative funding to develop such a program in Southern California. We believe tools and funding mechanism are available to build off existing local efforts, coordinate the entire region, and get conservation moving forward in this unique and highly biodiverse area of the world. This coalition is willing to provide information, tools, and help identify possible funding through our own expertise.

January 24, 2020

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

**RE: Comments on Southern California's Transportation Future: Draft
Connect SoCal Plan**

Dear Director Ajise,

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) Draft Connect SoCal Plan ("the Plan"). Orange County Business Council (OCBC) appreciates your consideration of all stakeholders' public comments.

OCBC represents and promotes the business community, working with government and academia, to enhance Orange County's economic development and prosperity in order to preserve a high quality of life. OCBC serves as an influential voice for solving Orange County's transportation challenges in collaborative, effective ways. OCBC advocates for equitable funding from state and federal sources for highway and transit improvement projects, more efficient interoperability between transportation modes and other objectives that support Orange County's infrastructure.

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) offers an excellent opportunity for SCAG's six counties to address the region's intersecting transportation, housing and climate challenges. OCBC is submitting the following comments.

1. General Comments

OCBC applauds SCAG's attempt at reducing daily per capita vehicle miles traveled (VMT) by improving transit reliability and encouraging congestion pricing through express lanes and "go zones". Generally, OCBC is supportive of these strategies. The region needs a strong, aspirational vision for reaching VMT reduction targets, and the Plan provides that vision thoroughly.

OCBC also commends SCAG for recognizing that, while building new roads is not a sole solution to congestion relief, ongoing maintenance and capital improvements for existing infrastructure are sorely needed throughout the region. OCBC agrees that gaps and choke points in the region's transportation infrastructure must be addressed.

Mr. Kome Ajise
 January 24, 2020
 Page 2 of 3

OCBC understands that SCAG must account for the needs of six counties when drafting the RTP. Each county has specific needs, and OCBC acknowledges that SCAG makes every effort to equitably support each county. While Los Angeles County is more populous, it is roughly three-fourths as dense as Orange County. Orange County is the densest county within SCAG's jurisdiction by a wide margin. The upcoming Regional Housing Needs Assessment (RHNA) cycle will concentrate density in Orange County even further. OCBC recommends that SCAG reconsider any other qualifying transit capital projects in Orange County to ensure that funding is distributed as equitably as possible, considering its density. Furthermore, housing needs **cannot** be met by densification alone. Providing for just one percent more land in "edge development"—specifically in Inland Empire—must be reconsidered.

2. Specific Comments on Connect SoCal

The following are OCBC's comments on specific components of the RTP:

Pages 65 to 69 detail the Plan's vision for **regional transit**. OCBC concurs with SCAG that mobility and sustainability goals depend on increasing transit accessibility and ridership. Regional agencies have invested billions into improving and expanding services to achieve this outcome. Yet, ridership continues to decline despite these investments. The RTP notes on Page 65 that first/last mile connections to rail stations, support for Metrolink's Southern California Optimized Rail Expansion, and extensive local investments in transit and rail networks are essential for transit to thrive. SCAG estimates that the Plan will increase transit use for work trips by three percent. OCBC applauds the Plan for reversing the trend of ridership decline and offers the comments below for SCAG's consideration to further enhance the Plan's impact on transit ridership:

Public Perception is a Root Cause of Ridership Decline: The aforementioned strategies are undoubtedly necessary, but OCBC recommends that SCAG evaluate other strategies to address the causes of ridership decline. Page 131 of the Plan states that better, more reliable transit service would encourage commuters to choose transit instead. However, there are significant cultural barriers that permeate throughout the region. The perception of transit as unreliable and unsafe—regardless of empirical data proving or disproving these perceptions—threatens to limit the effectiveness of accessibility and reliability improvements. Negative perceptions of transit persist despite ongoing, heavy investment in transit. Therefore, OCBC recommends that SCAG explore options to assist regional agencies and local governments in changing these perceptions through tangible safety improvements, public relations campaigns and innovative experimentation.

Potential Grassroots Solution: OCBC and its partners have proposed a grassroots campaign titled "Just One Trip a Week". The campaign would be a new movement to encourage alternative modes of mobility, including transit and active transportation, in a new way. The campaign invites workers and residents to take just one trip a week with a different mode of transportation

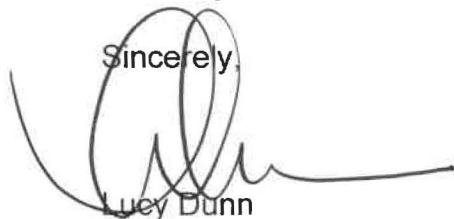
Mr. Kome Ajise
January 24, 2020
Page 3 of 3

than their car. Importantly, cities could collaborate with the business community to implement an app-based, locally-centered rewards program for campaign participants. With proper marketing and implementation, the campaign offers an incentive to utilize alternative modes of transportation while promoting their environmental and societal benefits. A grassroots campaign like **Just One Trip a Week** is unprecedented in the SCAG region, but blueprints to model the program can be found in other parts of the nation and the world. OCBC encourages SCAG to further examine the program's potential to create a sizeable dent in VMT and greenhouse gas emissions reduction targets with technical and financial support. Attached is a summary of the program.

3. Conclusion

OCBC appreciates the opportunity to offer input on the Draft Connect SoCal Plan. The RTP is the result of careful, comprehensive research. OCBC is proud to partner with SCAG on shared initiatives and looks forward to hosting Director Ajise in late February to discuss the Plan and RHNA further.

Sincerely,



Lucy Dunn
President and CEO
Orange County Business Council

Attachment: "**Just One Trip a Week**" Proposal



Just One Trip a Week.

Do your part.

#climatechange #justonetripaweek
#makeadifference #trysomethingnew
#getfreestuff #reduceVMT



Irvine Inspires with a New Movement: *Just a Trip a Week!*

TITLE OPTION:

Just a Trip a Week: Join the Local Movement for Global Sustainability

CONCEPT:

A clean environment, a strong economy, and active communities: these are the building blocks of healthy sustainability. You do not have to be 16-year-old climate change activist Greta Thunberg to make a positive impact to address climate change; or Jillian Michaels to lose weight and gain fitness; or Warren Buffet to grow a local economy. Every one of us can make a difference. But very few know *how*.

“Just a Trip a Week” offers a new approach for everyday people to make real change in their communities. By taking public transit, biking, or walking **just one trip a week**, individuals will reduce both carbon emissions and traffic, while exploring their city in a new way, gaining fitness in an easy way. It’s not every day. And it’s not every trip. It’s just one trip a week. And participants will be rewarded by local businesses with special discounts for joining the movement. Free pint from the local pub, anyone? Free movie tickets?

Similar campaigns in Italy and Australia have already shown success. Bologna created a tracking app called "Bella Mossa" recording people who biked, walked, or trained rather than drove, and rewarded them for it. Over 100 local businesses signed up to give away vouchers. 16,000 of those were claimed. And more than 3.7 million km were recorded through the app. Check out this video: <https://tinyurl.com/y8bqgu64>

We believe that Irvine is perfectly primed to spearhead this initiative in the United States. Our roads are congested. Our commuters are fed up. Our local businesses want more love. And Irvine has innovative transportation systems in place, which take nearly 2 million car trips off the road each year, ready to explore and grow. We already have the interest and momentum. Now we need to create the movement.

Blunt warning says Californians must step up to meet climate goals



CAPITOL ALERT



Californians not giving up trucks, SUVs – setting state up for failure on climate goals

RE ANDREW SHELLER

OCTOBER 08, 2019 05:00 AM (UPDATED OCTOBER 14, 2019 12:42 AM)

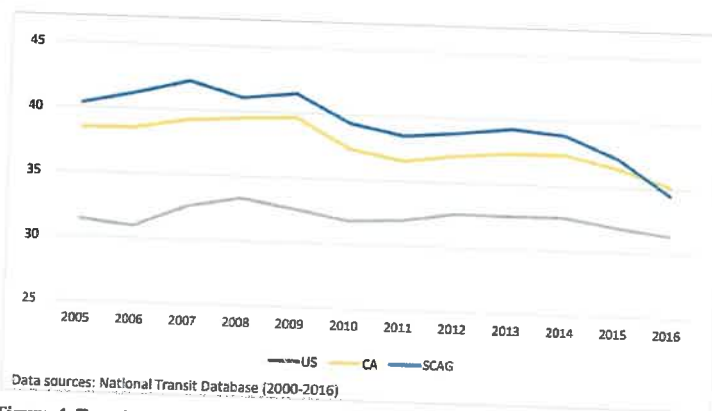


Figure 4. Transit trips per capita. Relatively flat nationally, but down in California since 2009.

PROPOSAL:

Create "Just a Trip a Week" movement to introduce and encourage exploring alternative modes of transit to help clean the air, clear the roads, and boost local businesses—while encouraging a healthy lifestyle.

The campaign will use a mobile phone app to tally bus, train, biking, or walking trips, assign points to these trips, and redeem the points for food, goods, entertainment, and services. While most travelers may prefer to drive alone in their car (car sales are up and transit riders are down), we believe that by "game-ifying" and rewarding commuters for their good actions, they'll become good habits — especially when they're rewarded with free ice cream, discounts on movie tickets, and special sales reserved just for participants like them.

By encouraging fewer single person-trips by car, congestion will be diminished, vehicle miles traveled (VMT) will be reduced, and greenhouse gas (GHG) emissions will be less. On top of all this, travelers will get to see their city through a different lens, learn new skills (like how to read

a bus schedule), allay fears of the unknown, stoke a sense of adventure within, and foster connection and community.

Win-win-win.

SUMMARY OF GOALS:

1. Reduce vehicle miles traveled--VMT
2. Reduce traffic congestion
3. Reduce greenhouse gases
4. Cause behavior shifts in trip making
5. Explore mobility alternatives in a fun way
6. Provide potential VMT mitigation with SB 743 CEQA changes
7. Promote local businesses/economic development
8. Help fight climate change, one individual at a time
9. Clean the air
10. Live a healthy, more active lifestyle
11. Fight childhood obesity (rising in OC)

TIMELINE

This is a perfect Earth Day 2020 Campaign to begin a year-long movement in Irvine. We need an app and website where people can find the information, and a marketing plan to help spread the movement far and wide. (Implementation details outlined below.)

We begin in Irvine—with their robust mobility systems, public and private sector engagement, show a successful reduction in VMT and GhG, and then help other cities emulate this initiative.



POTENTIAL SUPPORTERS AND SPONSORS

In order to bring this campaign to life, we have to secure grant funding or other outside funding sources.

<p>POTENTIAL SUPPORTERS NRDC Bicycle Coalition Surfriders Sierra Club School Ecology Clubs</p>	<p>POTENTIAL SPONSORS: OCTA Caltrans District 12 TCA City of Irvine Spectrumotion Irvine Chamber of Commerce OCBC Irvine Company Irvine Unified School District UCI Irvine Valley College Metrolink Amtrak Health care providers CARB AQMD SCAG Local Irvine Businesses (incentives)</p>
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IMPLEMENTATION:

So how will we make this happen? In this section, we've outlined the key players and processes necessary to get Just a Trip a Week up and running.

The City of Irvine will act as program lead and will hire a consultant as Program Administrator for the duration of the 1-year demonstration project. This Program Administrator will oversee the customization of MILES (an existing app that accumulates points) to tally bus, train, biking, or walking trips around the city of Irvine, and will manage the program's development and app maintenance. The Administrator will manage a public relations plan that includes social media and traditional media outlets focused on raising awareness and educating the public about the benefits of the movement. This person will oversee the creation and replenishment of an incentive plan, regularly seeking new benefits that participants desire (discounts for coffee, food, and clothing). Periodically, the Administrator will review program participation and submit an evaluation and monitoring report to the City demonstrating the level of participation and estimated VMT reduction. Based on the evaluation and monitoring, modifications will be made to the program to increase participation and success.

We'll also need to hire an App Developer to modify the MILES app according to direction from the Program Administrator. The App Developer will present a schedule for app completion and launch to the Program Administrator. After app modification and launch, the App Developer will be the primary support for the app through the duration of the demonstration period. The App Developer will also manage the rewards program and will add local vendors and services as they are identified by the Greater Irvine Chamber of Commerce or the Program Administrator.

The Greater Irvine Chamber of Commerce will support local vendor and service recruiting. The Chamber will identify an Incentive Coordinator on staff, responsible for providing committed local business contacts and connections to the App Developer. The Chamber Incentive Coordinator may use networking meetings, the results of the app survey, and other Chamber resources to engage local businesses and make initial contact to secure their involvement. Once the contact is committed, the incentive coordinator will pass the contact on to the App Developer, who will be responsible for adding and monitoring the new rewards.

Both the Incentive Coordinator and the App Developer will be responsible for reporting regularly to the Program Administrator on the use of rewards, the turnover of products and services, and the refreshing of the incentive pool. The Administrator will compile app use and reward program results and include them in regular reports to the City.

BUDGET

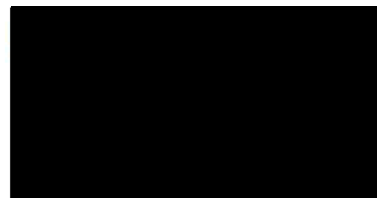
Budget Item	Fee
App development and maintenance/operation (at \$2,500 per month for 12 months)	\$30,000
Program Administrator management (at 8 hours per week)	\$65,000
Marketing/advertising support	\$150,000
Gift cards	\$20,000
Contingency	\$35,000
Total	\$300,000
Other Resources	
Chamber of Commerce man-hours	Priceless

NEXT STEPS

Identify public agency and private sector interest.
Identify grant opportunities and sponsorships.

CONTACT

Jaimee Bourgeois, Irvine
Mike Davis, Irvine
Lucy Dunn, Orange County Business Council
Tony Petros, LSA
Les Card, LSA





January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bd [REDACTED] ting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to and jobs closer together, making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTAs. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	<p>“Support statewide legislation that reduces barriers to new construction...”</p> <p>Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”</p>
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	<p>“... in areas subject to future two-foot sea level rise.”</p> <p>Cite the source used. Indicate where map is showing sea level rise and HQTAs.</p>
53	Clarification	p. 56, paragraph 1	<p>“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.”</p> <p>Local jurisdictions don’t build housing.</p>
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	“PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
19	Clarification	Table ES-5 p. 2.0-33	“PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
20	Clarification	Table ES-5 p. 2.0-34	“PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	“PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
23	Clarification	Table ES-5 p. 2.0-37	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
24	Clarification	ES-5 Table Geology and Soils	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



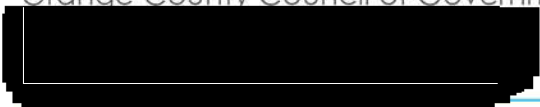
#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile automobiles do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define “Traffic Calming Measures”.
6	Clarification	p. 29, column 1, paragraph 2	<p>“Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe...” <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>”</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ...” <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [redacted], OCCOG Executive Director at [redacted]
[redacted] or [redacted]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with "Regionally Significant Local Streets and Roads *"
78	Clarification	p. 118, column 1, paragraph 3	"...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	"... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace "Trend" with "Baseline".
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	3.11-33, paragraph 3	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p>
		3.14-14 (paragraph 4)	<p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2)).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	<p>Add:</p> <p><u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u></p>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	<p>Suggested edit:</p> <p>After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u>October 2019.</p>
5	Clarification	p. 7; Table 3	<p>Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report.</p> <p>Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.</p>
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions-where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

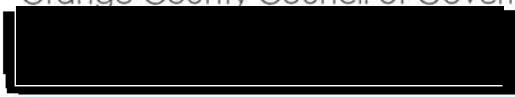
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [redacted], OCCOG Executive Director at [redacted]
[redacted] or [redacted]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to <u>and jobs closer together</u> , making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed $\frac{1}{2}$ percent sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two $\frac{1}{2}$ percent sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a $\frac{1}{4}$ percent sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario,</u> trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



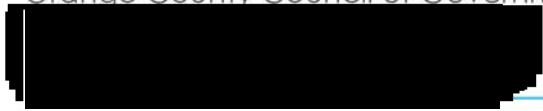
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.”</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	3.11-33, paragraph 3 3.14-14 (paragraph 4)	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	<p>“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u>”</p>
40	Clarification	3.14-13, paragraph 3	<p>“Regional Housing Needs Assessment</p> <p>... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u>”</p>
41	Clarification	3.14-15 (paragraph 2)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



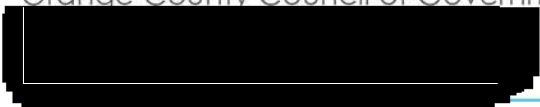
#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottleneaking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

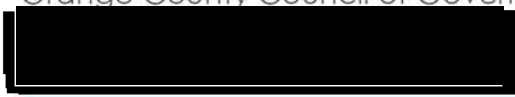
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	<p>“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u>”</p>
40	Clarification	3.14-13, paragraph 3	<p>“Regional Housing Needs Assessment</p> <p>... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u>”</p>
41	Clarification	3.14-15 (paragraph 2)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions-where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

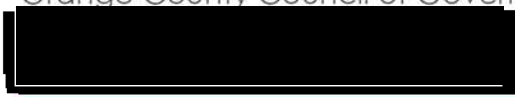
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to <u>and jobs closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.”</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



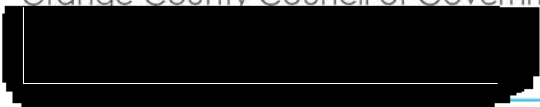
#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	<p>Add:</p> <p><u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u></p>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	<p>Suggested edit:</p> <p>After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u>October 2019.</p>
5	Clarification	p. 7; Table 3	<p>Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report.</p> <p>Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.</p>
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

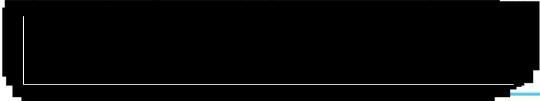
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions-where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

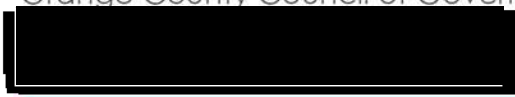
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs closer together, making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed ½ <u>percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two ½ <u>percent</u> sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a ¼ <u>percent</u> sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.”</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & Job Creation Analysis Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



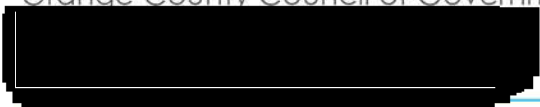
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	3.11-33, paragraph 3 3.14-14 (paragraph 4)	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	<p>“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u>”</p>
40	Clarification	3.14-13, paragraph 3	<p>“Regional Housing Needs Assessment</p> <p>... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u>”</p>
41	Clarification	3.14-15 (paragraph 2)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



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January 23, 2020

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

Subject: Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



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The OCCOG TAC review and analysis was discussed by the OCCOG Board at the January 23, 2020 Board of Directors meeting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



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OCCOG recommends revising the identification of HQTAs to reflect the nuance with certain HQTCs that fail to meet the “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



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cycle to allow for a more robust review process that would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed prior to asking the Regional Council to adopt the final plan.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



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CDR requested a copy of the final draft growth forecast dataset to confirm that all the technical corrections had been included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Tone*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *“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. OCCOG recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read “~~can and should~~ consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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



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over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG style guide policy to include the source and date of all data used in tables, charts, maps, infographics etc., included in technical reports.

12. *Fees and Taxes*

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



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not hesitate to contact me or Marnie Primmer, OCCOG Executive Director at

Sincerely,



Stacy Berry, Chair of the Board

Stacy Berry

Chair

Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to: <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>"We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces."</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: "Progress and next to advance the Core Vision can be found throughout Chapter 3". Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: "Key connections can be found in Chapter 3". Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing "per year" notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	"The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	"Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ..."
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	"Support statewide legislation that reduces barriers to new construction..." Considering coupling this with or replacing this with "Increase statewide funding to construct affordable housing"
50	Clarification	p. 50, column 1, paragraph 1	"Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, known as "Spheres of Influence," <u>where applicable and feasible.</u> "
51	Clarification	p. 50, column 2, paragraph 4	"Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
52	Green Region	p. 55, column 1, first sentence	"... in areas subject to future two-foot sea level rise." Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	"The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing." Local jurisdictions don't build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed $\frac{1}{2}$ <u>percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two $\frac{1}{2}$ <u>percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a $\frac{1}{4}$ <u>percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario,</u> trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate</u> a funding source for aging infrastructure and construction of other travel options"
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	<p>"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..."</p> <p>All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.</p>
34	Clarification	3.11-12, paragraph 1	<p>"City and county general plans must be consistent with each other."</p> <p>This statement is not accurate. Delete.</p>
35	Clarification	3.11-32, paragraph 1	<p>"Regional Housing Needs Assessment</p> <p>...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need.³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the 'overall impacts of transportation projects and land use strategies described in the Plan' and to evaluate reasonable alternatives, isn't the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the 'Residual' in the RHNA calculations.</p>
38	Clarification	3.11-33, paragraph 3 3.14-14 (paragraph 4)	<p>"The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment."</p> <p>"The RHNA does not necessarily encourage or promote growth..."</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2)).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	<p>Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)”</p> <p>Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.</p>
17	Correction	p. 41; column 1; Ridesharing	<p>Replace “ExpressLane” with “express lane”</p> <p>“ExpressLane” is a Metro branding of the generic express lane.</p>
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	<p>Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs?</p> <p>Replace “appendices” with “technical reports”</p>

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. <p>Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.</p>
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2025 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



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#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



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#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan Year 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



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#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



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#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



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Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..." Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible." Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTIC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTIC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *“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. OCCOG recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read “~~can and should~~ consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

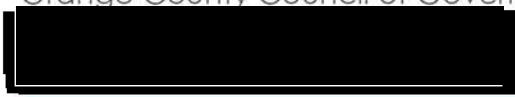
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [redacted], OCCOG Executive Director at [redacted]
[redacted] or [redacted]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.

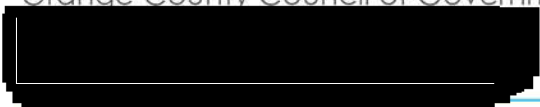


Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



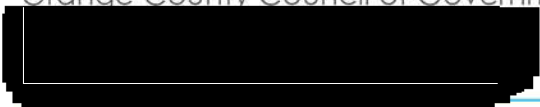
#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile automobiles do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed ½ <u>per</u> cent sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two ½ <u>per</u> cent sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a ¼ <u>per</u> cent sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario,</u> trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



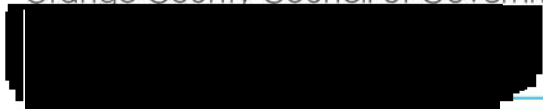
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.”</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	“PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
19	Clarification	Table ES-5 p. 2.0-33	“PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
20	Clarification	Table ES-5 p. 2.0-34	“PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	“PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
23	Clarification	Table ES-5 p. 2.0-37	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
24	Clarification	ES-5 Table Geology and Soils	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	<p>Add:</p> <p><u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u></p>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	<p>Suggested edit:</p> <p>After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u>October 2019.</p>
5	Clarification	p. 7; Table 3	<p>Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report.</p> <p>Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.</p>
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2025 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile automobiles do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTIC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTIC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *“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. OCCOG recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read “~~can and should~~ consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

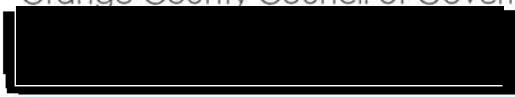
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

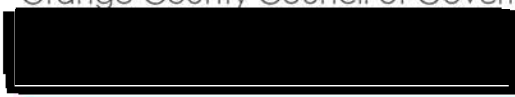
Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, therefore, it should not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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to <u>and jobs closer together</u> , making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario,</u> trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



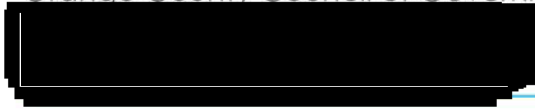
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2)).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane.”
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions-where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

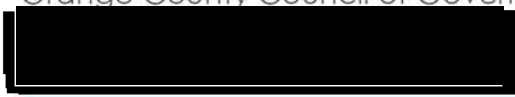
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to and jobs closer together, making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	“PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
19	Clarification	Table ES-5 p. 2.0-33	“PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
20	Clarification	Table ES-5 p. 2.0-34	“PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	“PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
23	Clarification	Table ES-5 p. 2.0-37	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
24	Clarification	ES-5 Table Geology and Soils	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	<p>“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u>”</p>
40	Clarification	3.14-13, paragraph 3	<p>“Regional Housing Needs Assessment</p> <p>... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u>”</p>
41	Clarification	3.14-15 (paragraph 2)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> Local jurisdictions should conducting public outreach... Local jurisdictions should identifying locations with... Local jurisdictions should promoting best engineering... Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> Local jurisdictions should supporting roadway, intersection... Local jurisdictions should promoting implementation of ... Local jurisdictions should implementing design treatments... Local jurisdictions should working with Transit network... Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions-where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

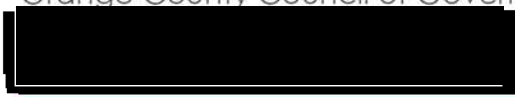
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to and jobs closer together, making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTA. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	<p>Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.</p> <p>“It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.</p>
102	Clarification	p. 143, column 1, item 15	<p>“Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.”</p>
103	Clarification	p. 143, column 2, item 16	<p>“The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ.</p>
104	Clarification	p. 143, column 2, item 18	<p>This should be updated to also account for the local road charge program.</p>
105	Clarification	p. 144, paragraph 4, first sentence.	<p>“The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.”</p> <p>Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .</p> <p>Who are the ‘constituent communities’?</p>
106	Clarification	p. 147, Table 5.4, last row	<p>This should be updated to also account for the local road charge program.</p>
107	Clarification	p. 151, column 1, paragraph 3	<p>“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”</p> <p>What is the Regional Housing Strategy Framework?</p> <p>How much money will be provided to jurisdictions?</p> <p>Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	“PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
19	Clarification	Table ES-5 p. 2.0-33	“PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
20	Clarification	Table ES-5 p. 2.0-34	“PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	“PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
23	Clarification	Table ES-5 p. 2.0-37	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
24	Clarification	ES-5 Table Geology and Soils	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2)).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



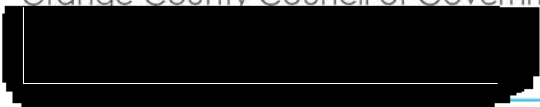
#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2025 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile automobiles do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“see Section III.2 of this document.” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> Local jurisdictions should conducting public outreach... Local jurisdictions should identifying locations with... Local jurisdictions should promoting best engineering... Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> Local jurisdictions should supporting roadway, intersection... Local jurisdictions should promoting implementation of ... Local jurisdictions should implementing design treatments... Local jurisdictions should working with Transit network... Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] could [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

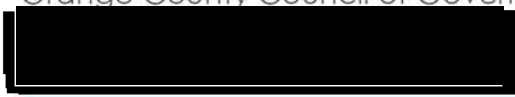
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to <u>and jobs closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	<p>Add source for the economic benefits of new housing construction.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	“...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms.”
42	Clarification	p.36	<p>Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>
43	Clarification	p. 39, graphic	<p>“If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	“This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> ”
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	“...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with "Regionally Significant Local Streets and Roads *"
78	Clarification	p. 118, column 1, paragraph 3	"...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	"... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace "Trend" with "Baseline".
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



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			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



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			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	3.11-33, paragraph 3 3.14-14 (paragraph 4)	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG's growth forecasts are within 1.5% of the DOF growth forecasts, then the COG's forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>"The RHNA does not necessarily encourage or promote growth..." This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on "comparable housing markets...as determined by the COG." Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>"Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period."</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile automobiles do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..." Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible." Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

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The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. *Fees and Taxes*

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs closer together, making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>"We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces."</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTA. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: "Progress and next to advance the Core Vision can be found throughout Chapter 3". Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: "Key connections can be found in Chapter 3". Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing "per year" notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	"The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	"Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ..."
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	"Support statewide legislation that reduces barriers to new construction..." Considering coupling this with or replacing this with "Increase statewide funding to construct affordable housing"
50	Clarification	p. 50, column 1, paragraph 1	"Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, known as "Spheres of Influence," <u>where applicable and feasible.</u> "
51	Clarification	p. 50, column 2, paragraph 4	"Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
52	Green Region	p. 55, column 1, first sentence	"... in areas subject to future two-foot sea level rise." Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	"The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing." Local jurisdictions don't build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with "Regionally Significant Local Streets and Roads *"
78	Clarification	p. 118, column 1, paragraph 3	"...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	"... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace "Trend" with "Baseline".
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing "\$312 billion" with "\$316 billion" Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	"Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: "In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG's accessibility analysis seeks to determine how the Plan improves residents' ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>" Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	"Accessibility parks and schools"- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn't protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



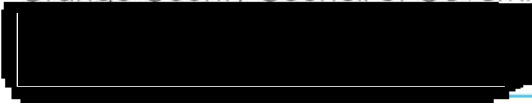
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Question – Will the existing needs portion of the 6 th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG's growth forecasts are within 1.5% of the DOF growth forecasts, then the COG's forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>"The RHNA does not necessarily encourage or promote growth..." This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on "comparable housing markets...as determined by the COG." Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>"Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period."</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say "...supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)" Add a sentence suggesting that TNC's can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace "ExpressLane" with "express lane" "ExpressLane" is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, "Forecasts for the 2017? through 2025? planning years..."
20	Define	945	LAND USE. Define small area levels in "The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative."
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace "appendices" with "technical reports"

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..." Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible." Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. 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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

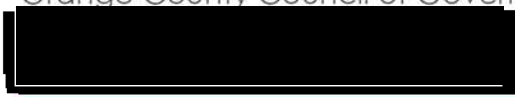
10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTA. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	"Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ..."
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	"Support statewide legislation that reduces barriers to new construction..." Considering coupling this with or replacing this with "Increase statewide funding to construct affordable housing"
50	Clarification	p. 50, column 1, paragraph 1	"Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, known as "Spheres of Influence," <u>where applicable and feasible.</u> "
51	Clarification	p. 50, column 2, paragraph 4	"Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
52	Green Region	p. 55, column 1, first sentence	"... in areas subject to future two-foot sea level rise." Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	"The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing." Local jurisdictions don't build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed $\frac{1}{2}$ percent sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two $\frac{1}{2}$ percent sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a $\frac{1}{4}$ percent sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with "Regionally Significant Local Streets and Roads *"
78	Clarification	p. 118, column 1, paragraph 3	"...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	"... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace "Trend" with "Baseline".
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing "\$312 billion" with "\$316 billion" Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	"Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: "In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG's accessibility analysis seeks to determine how the Plan improves residents' ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>" Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	"Accessibility parks and schools"- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn't protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the 'overall impacts of transportation projects and land use strategies described in the Plan' and to evaluate reasonable alternatives, isn't the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the 'Residual' in the RHNA calculations.</p>
38	Clarification	3.11-33, paragraph 3 3.14-14 (paragraph 4)	<p>"The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment."</p> <p>"The RHNA does not necessarily encourage or promote growth..."</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2)).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG's growth forecasts are within 1.5% of the DOF growth forecasts, then the COG's forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>"The RHNA does not necessarily encourage or promote growth..." This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on "comparable housing markets...as determined by the COG." Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>"Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period."</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..." Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible." Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs closer together, making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTA. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	"Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ..."
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	"Support statewide legislation that reduces barriers to new construction..." Considering coupling this with or replacing this with "Increase statewide funding to construct affordable housing"
50	Clarification	p. 50, column 1, paragraph 1	"Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, known as "Spheres of Influence," <u>where applicable and feasible.</u> "
51	Clarification	p. 50, column 2, paragraph 4	"Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
52	Green Region	p. 55, column 1, first sentence	"... in areas subject to future two-foot sea level rise." Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	"The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing." Local jurisdictions don't build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing "\$312 billion" with "\$316 billion" Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	"Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: "In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG's accessibility analysis seeks to determine how the Plan improves residents' ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>" Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	"Accessibility parks and schools"- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn't protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



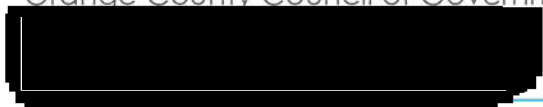
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region's housing need.³⁶ HCD's determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG's total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG's population projections."</u></p>
36	Clarification	3.11-32, paragraph 4	<p>"The purpose of the housing element is to identify the community's housing needs, <u>as determined by the RHNA process</u>, state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs."</p>
37	Clarification	3.11-32, paragraph 4 & 3.14-14, paragraph 2 3.11-39, paragraph 2	<p>"In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan."</p> <p>"...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions..."</p> <p>"²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region..."</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Question – Will the existing needs portion of the 6 th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG's growth forecasts are within 1.5% of the DOF growth forecasts, then the COG's forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>"The RHNA does not necessarily encourage or promote growth..." This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on "comparable housing markets...as determined by the COG." Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>"Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period."</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..." Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible." Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

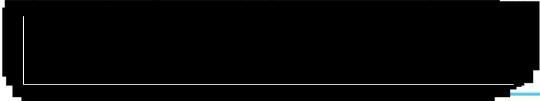
#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



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The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bd [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTAC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTAC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



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not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to <u>and jobs closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTA. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with "Regionally Significant Local Streets and Roads *"
78	Clarification	p. 118, column 1, paragraph 3	"...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	"... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace "Trend" with "Baseline".
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing "\$312 billion" with "\$316 billion" Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	"Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: "In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG's accessibility analysis seeks to determine how the Plan improves residents' ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>" Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	"Accessibility parks and schools"- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn't protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>“The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.”</p> <p>“The RHNA does not necessarily encourage or promote growth...”</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2)).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Question – Will the existing needs portion of the 6 th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG's growth forecasts are within 1.5% of the DOF growth forecasts, then the COG's forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>"The RHNA does not necessarily encourage or promote growth..." This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on "comparable housing markets...as determined by the COG." Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>"Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period."</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say "...supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)" Add a sentence suggesting that TNC's can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace "ExpressLane" with "express lane" "ExpressLane" is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, "Forecasts for the 2017? through 2025? planning years..."
20	Define	945	LAND USE. Define small area levels in "The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative."
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace "appendices" with "technical reports"

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..." Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible." Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions-where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> Local jurisdictions should improving safe driving... Local jurisdictions should applying advanced technology ... Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> Local jurisdictions should establishing a task force to... Local jurisdictions should implementing the Driver... Local jurisdictions should supporting state authorities... Local jurisdictions should implementing and maintain... Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region’s ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region’s greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. Fees and Taxes

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [REDACTED], OCCOG Executive Director at [REDACTED]
[REDACTED] or [REDACTED]

Sincerely,



Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTA. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	"Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ..."
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	"Support statewide legislation that reduces barriers to new construction..." Considering coupling this with or replacing this with "Increase statewide funding to construct affordable housing"
50	Clarification	p. 50, column 1, paragraph 1	"Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, known as "Spheres of Influence," <u>where applicable and feasible.</u> "
51	Clarification	p. 50, column 2, paragraph 4	"Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
52	Green Region	p. 55, column 1, first sentence	"... in areas subject to future two-foot sea level rise." Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	"The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing." Local jurisdictions don't build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing "\$312 billion" with "\$316 billion" Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	"Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: "In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG's accessibility analysis seeks to determine how the Plan improves residents' ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>" Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	"Accessibility parks and schools"- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn't protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.</p> <p>If the PEIR is supposed to evaluate the 'overall impacts of transportation projects and land use strategies described in the Plan' and to evaluate reasonable alternatives, isn't the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing.</p> <p>The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the 'Residual' in the RHNA calculations.</p>
38	Clarification	<p>3.11-33, paragraph 3</p> <p>3.14-14 (paragraph 4)</p>	<p>"The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need <u>at the regional level, which is disaggregated and prescribed to areas as determined by SCAG</u>, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment."</p> <p>"The RHNA does not necessarily encourage or promote growth..."</p> <p>This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG's growth forecasts are within 1.5% of the DOF growth forecasts, then the COG's forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>"The RHNA does not necessarily encourage or promote growth..." This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on "comparable housing markets...as determined by the COG." Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>"Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period."</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> Local jurisdictions should improving safe driving... Local jurisdictions should applying advanced technology ... Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> Local jurisdictions should establishing a task force to... Local jurisdictions should implementing the Driver... Local jurisdictions should supporting state authorities... Local jurisdictions should implementing and maintain... Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



Orange County Council of Governments

Orange County Council of Governments (OCCOG)

www.occog.com

January 23, 2020

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

Subject: *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and a [REDACTED] ssed by the OCCOG Board at th [REDACTED] 23, [REDACTED] Bo [REDACTED] tting and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

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). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG's definition for HQTAs. The draft RTP/SCS defines HQTAs as "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours." The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are "corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The definition for HQTCs does not account for walkability.



OCCOG recommends revising [REDACTED] of HQTAs to reflect the nuance [REDACTED] maintain [REDACTED] to [REDACTED] “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust [REDACTED] that would ensure that comment [REDACTED] provided [REDACTED] [REDACTED] 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.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. *Growth Forecast*

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the [REDACTED] forecast dataset to confirm the [REDACTED] [REDACTED] [REDACTED] included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. *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.

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. *Maintain Unbiased, Objective Language*

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

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. *"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. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems inappropriate 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.

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only 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, res [REDACTED] regulation in the mitigation me [REDACTED] should [REDACTED] in [REDACTED] been the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

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

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

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

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. 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 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.



Recommendation: Make it a SCAG policy to include the source and data in infographics etc., included in technical reports.

12. *Fees and Taxes*

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

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



not hesitate to contact me or [redacted], OCCOG Executive Director at [redacted]
[redacted] or [redacted]

Sincerely,


Stacy Berry, Chair of the Board

Stacy Berry
Chair
Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



Contents

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS 10

Table 2. PEIR COMMENTS..... 26

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS 38

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS 39

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS 41

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS 43

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS 45

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS 46

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS 48

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS..... 52

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS..... 52

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS 53

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS..... 54

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS..... 56

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS 57

Table 16. SCS TECHNICAL REPORT COMMENTS 57

Table 17. TRANSIT TECHNICAL REPORT COMMENTS 58

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS 58

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS 59

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS..... 59

Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	"...but also by bringing housing closer to and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car."
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>"We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces."</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: "Progress and next to advance the Core Vision can be found throughout Chapter 3". Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: "Key connections can be found in Chapter 3". Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing "per year" notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	"The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	"Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ..."
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	"Support statewide legislation that reduces barriers to new construction..." Considering coupling this with or replacing this with "Increase statewide funding to construct affordable housing"
50	Clarification	p. 50, column 1, paragraph 1	"Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, known as "Spheres of Influence," <u>where applicable and feasible.</u> "
51	Clarification	p. 50, column 2, paragraph 4	"Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
52	Green Region	p. 55, column 1, first sentence	"... in areas subject to future two-foot sea level rise." Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	"The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing." Local jurisdictions don't build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	"Project level mitigation measures have been identified that "can and should <u>where applicable and feasible</u> " be undertaken by lead agencies that implement transportation projects..."
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	"Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)..."
73	Correction	p. 108, Table 4.5.1 second row	"The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ..."
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with "Regionally Significant Local Streets and Roads *"
78	Clarification	p. 118, column 1, paragraph 3	"...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	"... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace "Trend" with "Baseline".
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing ", Thousands".
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing "\$312 billion" with "\$316 billion" Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	"Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: "In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG's accessibility analysis seeks to determine how the Plan improves residents' ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>" Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	"Accessibility parks and schools"- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn't protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-<u>percent</u> sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-<u>percent</u> sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-<u>percent</u> sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-<u>percent</u> sales tax. Also refers to Los Angeles County’s local half <u>percent</u> sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-<u>percent</u> sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <u>Job Creation Analysis</u> Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	"Establish a mileage-based user fee <u>to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options"</u>
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. "Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes."
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions' planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects 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:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	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:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <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.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Question – Will the existing needs portion of the 6 th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG's growth forecasts are within 1.5% of the DOF growth forecasts, then the COG's forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>"The RHNA does not necessarily encourage or promote growth..." This sentence is false. Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the objectives of RHNA is "promoting infill development...the encouragement of efficient development patterns..." (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on "comparable housing markets...as determined by the COG." Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>"Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period."</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say "...supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)" Add a sentence suggesting that TNC's can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace "ExpressLane" with "express lane" "ExpressLane" is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, "Forecasts for the 2017? through 2025? planning years..."
20	Define	945	LAND USE. Define small area levels in "The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative."
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace "appendices" with "technical reports"

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace "Los Angeles region" with "SCAG region"
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace "2021-2025" with "FY2020-21 through FY2024-25"
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 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.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..." Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible." Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should conducting public outreach... • Local jurisdictions should identifying locations with... • Local jurisdictions should promoting best engineering... • Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> • Local jurisdictions should supporting roadway, intersection... • Local jurisdictions should promoting implementation of ... • Local jurisdictions should implementing design treatments... • Local jurisdictions should working with Transit network... • Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting connecting bicycle... • Local jurisdictions should-developing and implement... • Local jurisdictions should-adopting Complete Streets... • Local jurisdictions should-implementing pedestrian and... • Local jurisdictions should-using intersection control... • Local jurisdictions should-conducting bicycle education... • Local jurisdictions should-supporting expanding Safe... • Local jurisdictions should-utilizing SCAG’s ... • Local jurisdictions should-implementing traffic calming... • Local jurisdictions-where applicable should-developing a... • Local jurisdictions should-participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-supporting the use of dedicated... • Local jurisdictions should-identifying intersections and... • Local jurisdictions should-identifying and promote the... • Local jurisdictions should-identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-developing enforcement and... • Local jurisdictions should-improving data quality on... • Local jurisdictions should-conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should-using Intelligent... • Local jurisdictions should-developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects-initiatives that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTAs mapping to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRS -57 from Lambert to <u>LA-La</u> County Line - Add 1 NBN Truck Climbing Lane \$167,550 -\$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCs</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCs and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...



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Ms. Sarah Jepson
Planning Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Re: **Comments on the Draft 2020-2045 Regional Transportation Plan/
Sustainable Communities Strategy and Program Environmental Impact
Report**

Dear Ms. Jepson:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), and associated Program Environmental Impact Report (PEIR). The draft RTP/SCS and PEIR reflect the transportation and funding challenges that the region will face in the coming years. These documents are critical to the region's ability to improve mobility, and to operate and maintain the transportation system.

The Orange County Transportation Authority (OCTA) appreciates that SCAG has included the commitments identified in OCTA's 2018 Long-Range Transportation Plan (LRTP), as well as demographic forecasts approved and submitted by the Orange County Council of Governments. Additionally, OCTA recognizes the hard work and cooperation of SCAG staff throughout the RTP/SCS and PEIR development process.

In reviewing the draft RTP/SCS and PEIR, OCTA has identified several policy and technical matters that require attention. These primarily focus on regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). The regional strategies include assumptions for new revenue sources, passenger rail assumptions, regional express lanes, and other investments beyond the LRTP. Additionally, OCTA recommends refining the mapping of High-Quality Transit Areas (HQTAs) to accurately reflect areas of transit accessibility.

New Revenue Sources and Innovative Financing Strategies

The draft RTP/SCS suggests that without the use of anticipated new revenue sources and innovative financing strategies, the region faces a funding shortfall of approximately \$139.4 billion (in year-of-expenditure dollars [YOES]). The following

Ms. Sarah Jepson
 January 24, 2020
 Page 2

guiding principles were used to identify reasonably available funding sources to address the shortfall:

- Establish a user fee-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits.
- Promote national and state programs that include return-to-source guarantees, while maintaining flexibility to reward regions that continue to commit substantial local resources.
- Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of the Transportation Infrastructure Finance and Innovation Act) to attract private capital and accelerate project delivery.
- Promote local funding strategies that maximize the value of public assets while improving mobility, sustainability, and resilience.

Utilizing these principles, the draft RTP/SCS identifies seven anticipated revenue sources and innovative funding strategies projected to generate \$139.4 billion (YOES) over the planning horizon. Two sources combined (mileage-based user fee and local road charge program) would account for nearly 86 percent of the identified new revenues sources. As noted in the draft RTP/SCS, several requisite actions are anticipated before full deployment of these new transportation user fees would be realized.

OCTA recommends that SCAG staff provide regular updates to the SCAG Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:

- Technology and associated privacy issues,
- Cost of implementation and administrative methods for fee collection/revenue allocation,
- Equity concerns and exemptions/credits, as applicable,
- Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions (including GHG emissions), and
- Economic assessment.

Further, OCTA recommends that SCAG staff also work with the CTCs and other stakeholders to evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.

Ms. Sarah Jepson
 January 24, 2020
 Page 3

Passenger Rail Assumptions

The draft RTP/SCS assumes the Metrolink Southern California Optimized Rail Expansion (SCORE) Program capital components are completed by 2035 at a cost of \$10.5 billion (YOES). The SCORE Program would accommodate a significant increase in Metrolink service with up to 15-minute peak-period service on much of the Metrolink system. The draft RTP/SCS also assumes SCORE Program operating costs between 2035 and 2045 of \$3.2 billion (YOES), funded by new revenue sources and innovative funding strategies.

The draft RTP/SCS further includes phase one of the California High-Speed Rail (CHSR) Project at a regional cost of \$34.6 billion (YOES). The CHSR 2018 Business Plan redefined the initial operating segment from between the City of Merced (in the San Joaquin Valley) and the Burbank Bob Hope Airport station to between the cities of Merced and Bakersfield, with revenue service starting in late 2028. Phase one, which would span from the City of San Francisco to the City of Anaheim, is anticipated to start revenue service in 2033.

OCTA recommends that SCAG staff provide regular updates to the SCAG Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. OCTA recommends that SCAG staff coordinate efforts to develop an integrated capital and operating plan for the CHSR Project and the Metrolink SCORE Program. Additionally, OCTA suggests that SCAG staff assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program including securing new revenue sources to support operations at the levels assumed in the draft RTP/SCS.

Regional Express Lane Network

The draft RTP/SCS generally carries over the proposed regional express lane network included in the adopted 2016-2040 RTP/SCS. The draft RTP/SCS proposed regional express lane network segments would add the following Orange County express lane segments:

Facility	From	To
I-405	SR-55	Los Angeles County line
SR-73	MacArthur Boulevard	I-405
SR-55	I-405	SR-91
I-605	I-405	Los Angeles County line

I-405 – Interstate 405

SR-55 – State Route 55

SR-73 – State Route 73

SR-91 – State Route 91

I-605 – Interstate 605

Ms. Sarah Jepson
January 24, 2020
Page 4

The draft RTP/SCS proposed regional express lane network also identifies express lane connectors in Orange County at the following interchanges: I-405/I-605, I-405/SR-73, I-405/SR-55, SR-55/I-5, and SR-55/SR-91.

The draft RTP/SCS should recognize that the OCTA Board of Directors has not approved conversion from high-occupancy vehicle to tolled express lanes for SR-55, SR-73, I-605, or on I-405 north of I-605 as depicted in the proposed regional express lanes network. Furthermore, the draft RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.

Other Investments Beyond the 2018 LRTP

The draft RTP/SCS proposes several other investments in addition to those noted herein that affect Orange County and go beyond the LRTP. Examples include:

- \$6 billion (YOES) to expand bus service in high-quality transit corridors,
- \$2 billion (YOES) for a plug-in electric vehicle rebate program,
- \$5 billion (YOES) for safety initiatives,
- \$2 billion (YOES) in a mobility equity fund,
- \$3 billion (YOES) for housing-supportive infrastructure, and
- \$2 billion (YOES) for pooled incentives.

SCAG staff have stated that these investments are being funded with new revenue sources and innovative financing strategies.

An additional emphasis is also placed on active transportation improvements with the draft RTP/SCS proposing to invest \$22.5 billion (YOES). About \$3.7 billion (YOES) of the total investment reflects active transportation projects submitted by CTCs. SCAG proposes investing another \$14 billion (YOES) from the draft RTP/SCS new revenue sources and innovative financing strategies. SCAG then estimates that the remaining \$4.8 billion (YOES) would be invested in active transportation components of roadway operations and maintenance efforts.

OCTA recognizes that it is within SCAG's purview to plan for regional strategies that enhance transportation; however, it should be noted that OCTA is committed to delivering the projects within the LRTP. The draft RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies. OCTA will only consider additional investments after new revenues are realized and identified to account for these additional improvements.

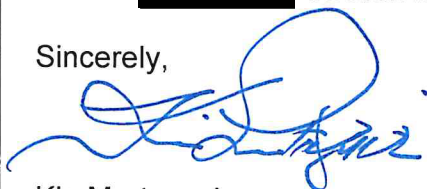
Ms. Sarah Jepson
January 24, 2020
Page 5

Mapping of HQTAs

As noted in the draft RTP/SCS, HQTAs are defined as “generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.” The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 (Chapter 728, Statutes of 2008), which defines Major Transit Stops and HQTAs. OCTA recommends revising the mapping of HQTAs in the RTP/SCS to reflect the nuance with certain HQTAs that fail to meet the “walkable corridor” characterization. Namely, freeway-running segments of HQTAs are clearly not walkable and should be treated like a rail transit service, focusing only on stop locations when operating on a freeway. Additionally, OCTA notes that subsequent use of HQTAs for other planning activities and/or policy decisions should recognize that transit agencies adjust existing service on a regular basis and planned improvements are expected to be implemented by the RTP/SCS horizon year of 2045. For example, planned improvement could fall outside the Sixth Cycle Regional Housing Needs Assessment timeframe. Transit planning studies may also be completed by transit agencies on a more frequent basis than the RTP/SCS is updated by SCAG.

Additional technical comments will be submitted separately. OCTA appreciates SCAG’s work on the RTP/SCS and PEIR and looks forward to the adoption of the final 2020-2045 RTP/SCS and PEIR in April. If you have further questions, please contact [REDACTED] Section Manager II, at [REDACTED]

Sincerely,



Kia Mortazavi
Executive Director, Planning

KM:ww

c: Executive Staff

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects-initiatives that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRSr-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBNb Truck Climbing Lane <u>\$167,550</u> \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCS</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCS and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTAs mapping to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan 2019 In-Progress
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRSr-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBNb Truck Climbing Lane <u>\$167,550</u> \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCs</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCs and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to</u>:-</p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTAs mapping to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	Requested edit: OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 2019 2017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 2019 2017, the average AM peak-period ICU improved from 0.67 to 0.600 0.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.630 0.64, a 12.5 an 11 percent improvement.
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: <p style="text-align: center;">SRS-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBN Truck Climbing Lane <u>\$167,550</u> -\$124,600</p>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCS</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCS and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan 2019 In-Progress
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRS -57 from Lambert to <u>LA</u> - La County Line - Add 1 NBN Truck Climbing Lane <u>\$167,550</u> - \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) <i>RTP ID to be determined by SCAG</i> 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCs</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCs and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to</u>:-</p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	Requested edit: OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 2019 2017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 2019 2017, the average AM peak-period ICU improved from 0.67 to 0.600 0.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.630 0.64, a 12.5 an 11 percent improvement.
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRSr-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBNb Truck Climbing Lane <u>\$167,550</u> \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCS</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCS and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs-Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: <u>OC Orange County Active Transportation Plan 2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRSr-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBNb Truck Climbing Lane <u>\$167,550</u> \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCs</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCs and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRS -57 from Lambert to <u>LA-La</u> County Line - Add 1 NBN Truck Climbing Lane <u>\$167,550</u> \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) <i>RTP ID to be determined by SCAG</i> 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCs</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCs and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRSr-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBNb Truck Climbing Lane <u>\$167,550</u> \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCS</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCS and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects-initiatives that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	Requested edit: OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 2019 2017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 2019 2017, the average AM peak-period ICU improved from 0.67 to 0.600 0.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.630 0.64, a 12.5 an 11 percent improvement.
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: <p style="text-align: center;">SRS-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBN Truck Climbing Lane <u>\$167,550</u> -\$124,600</p>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCs</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCs and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects-initiatives that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTA mapping to remove HQTC segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTA mapping and narrative to remove HQTC segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan 2019 In-Progress
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRS -57 from Lambert to <u>LA-La</u> County Line - Add 1 NBN Truck Climbing Lane \$167,550 -\$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCs</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCs and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
1	All documents	Multiple locations	Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.
2	All documents	Multiple locations	Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.
3	All documents	Multiple locations	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
4	<i>Making Connections</i>	5; right column; <i>Core Vision</i>	Differentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
5	<i>Making Connections</i>	5; right column; <i>Key Connections</i>	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
6	<i>Making Connections</i>	5; right column; <i>Economic Impact</i>	For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
7	<i>Making Connections</i>	5; right column; <i>Plan Benefits</i>	Verify values as it appears to be inconsistent with the Performance Measures Technical Report.
8	Chapter 1	8; right column; <i>Laws that guide the Plan</i> ; 1 st bullet	Verify that the reference be to “U.S.C.”, as in United States Code.
9	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 3 rd paragraph	<p>Requested edits:</p> <p>SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <u>projects-initiatives</u> that <u>go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.</p>
10	Chapter 1	11; left column; <i>How the Plan was developed</i> ; 4 th paragraph; 5 th line	Replace “New Mobility” with “Mobility Innovations”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
11	Chapter 1	11; right column; <i>How the Plan was developed</i> ; 3 rd paragraph	Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan-plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been <u>are</u> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies. Highlights of what we heard from them include:
12	Chapter 1	13; right column; <i>Connect SoCal technical reports</i>	Economic & Jobs Forecast <u>Job Creation Analysis</u>
13	Chapter 2	19; left column; <i>Structural economic changes</i> ; last paragraph; last sentence	Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.
14	Chapter 2	22; <i>Table 2.1, Share of Total Growth (2008-2016)</i>	Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
15	Chapter 2	27, <i>Exhibit 2.4</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
16	Chapter 2	29; <i>Transportation system</i> ; 2 nd , 3 rd , and 5 th bullets	Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
17	Chapter 2	29; right column; <i>Transportation system</i> ; last bullet	Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.
18	Chapter 2	32; right column; <i>Affordable housing</i> ; last paragraph	Add the source for the economic benefits of new housing construction.
19	Chapter 2	41; left column; <i>Access & mobility</i> ; 1 st paragraph	Clarify what is “outdated road technology”.
20	Chapter 2	41; left column; <i>Access & mobility</i> ; 2 nd paragraph	Provide a reference to Congestion Management Technical Report.
21	Chapter 3	59; left column; <i>Preserve & optimize our current system</i> ; last sentence	It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.
22	Chapter 3	59; right column; <i>Planning for 2045</i> ; 1 st paragraph	Suggested edit: The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.8B billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and roads</u> .
23	Chapter 3	64; left column; <i>Transportation system management</i> ; 1 st sentence	Revise to reflect that TSM is broader than ITS.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
24	Chapter 3	73; right column; <i>Highway & arterial network</i> ; 2 nd paragraph	Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...
25	Chapter 3	74; left column; <i>Highway & arterial network</i> ; 1 st paragraph; 5 th line	Requested edit: ...believes merits future consideration for <u>potential</u> inclusion in the financially constrained...
26	Chapter 3	74, right column, <i>Regional express lane network</i> ; 2 nd paragraph	Replace "1-105" with "I-105"
27	Chapter 3	75; <i>Exhibit 3.2</i>	The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.
28	Chapter 3	79; <i>Exhibit 3.3</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.
29	Chapter 3	81; right column; <i>Table 3.3</i>	Define the airport codes as many are not commonly known.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
30	Chapter 3	87 & 89; <i>Exhibits 3.4 & 3.6</i>	Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTAs mapping to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
31	Chapter 3	91; <i>Exhibit 3.8</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
32	Chapter 4	108; <i>Table 4.5.1; Local option sales tax measures</i>	With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.
33	Chapter 4	108; <i>Table 4.5.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
34	Chapter 4	107; <i>Table 4.4; Local road charge program</i>	Clarify if this revenue source would be indexed to maintain purchasing power.
35	Chapter 4	114; <i>Table 4.6.2; Active Transportation</i>	Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”
36	Chapter 5	118; left column; <i>Connect SoCal & performance-based planning</i> ; 3 rd column; 4 th line	Suggested edit: ...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
37	Chapter 5	120, left column; <i>Connect SoCal performance outcomes</i> ; 2 nd bullet	Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
38	Chapter 5	121; <i>Connect SoCal performance profile</i>	Suggest replacing “Trend” with “Baseline”
39	Chapter 5	122; <i>Connect SoCal performance results</i>	The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.
40	Chapter 5	125; <i>Table 5.1</i>	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
41	Chapter 5	125; <i>Table 5.1</i>	The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
42	Chapter 5	126; <i>Table 5.1</i>	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.
43	Chapter 5	131; left column; <i>Figure 5.3</i>	Title appears to be missing “, Thousands”
44	Chapter 5	132; left column; <i>Mean commute time</i>	Verify listed values as they appear to be inconsistent with Public Health Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
45	Chapter 5	133; right column; <i>Outcome 3: safety & public health</i> ; 2 nd paragraph; 4 th sentence	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
46	Chapter 5	134; left column; <i>Outcome 5: economic opportunity</i> ; last sentence	Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.
47	Chapter 5	135; left column; <i>Outcome 7: transportation system sustainability</i> ; 2 nd paragraph	Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
48	Chapter 5	136; <i>Table 5.3</i> ; 1 st row	Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”
49	Chapter 5	142; right column; <i>Roadway noise impacts</i>	Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of toll lanes, including HOT lanes.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
50	Chapter 5	143; left column; <i>Connect SoCal revenue sources & tax burdens</i> ; 2 nd sentence	Suggested edit: Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis.
51	Chapter 5	143; right column; <i>Connect SoCal Investments</i> ; 1 st sentence	Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents <u>a potential substantial impacts</u> on EJ.
52	Chapter 5	143; right column; <i>Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
53	Chapter 5	147; <i>Table 5.4; Mileage-based user fee impacts</i>	This should be updated to also account for the local road charge program.
55	<i>Glossary</i>	Multiple locations	Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.
56	<i>Data Index</i>	177; <i>Technical reports</i>	Economic & <u>Job Creation Analysis Jobs-Forecast</u>
57	Active Transportation Technical Report	22; left column; <i>Regional Agency Engagement</i> ; 7 th line	Suggested edit: ...Plans, SBCTA's Sidewalk Inventory project, <u>OCTA's</u> OC Active, strategic first-last mile...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
58	Active Transportation Technical Report	42; <i>Figure 27</i>	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
59	Active Transportation Technical Report	44; right column; <i>Current bikeway network</i> ; 1 st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.
60	Active Transportation Technical Report	49; left column; <i>Cities and counties</i> ; 2 nd paragraph; 1 st sentence	This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.
61	Active Transportation Technical Report	57; right column; <i>Table 8; 2045 Connect SoCal average commute time walking</i>	Verify figure as it appears to be inconsistent with the Public Health Technical Report.
62	Active Transportation Technical Report	58; right column; <i>Table 9</i>	Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.
63	Active Transportation Technical Report	63; left column; <i>Technology and micro-mobility strategies</i> ; 1 st bullet	Is this an example or the “regional standard”?
64	Active Transportation Technical Report	65; <i>Table 10</i> ; Total	Check the math or include a note that it does not sum to the total due to rounding.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
65	Active Transportation Technical Report	67; left column; <i>Actions for technology and micro-mobility</i> ; 1 st bullet	Why only Caltrans?
66	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 1 st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 <u>billion (in nominal dollars)</u> in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon <u>reasonably</u> available funding.
67	Active Transportation Technical Report	68; left column; <i>Strategic Plan</i> ; 3rd paragraph; 1 st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
68	Active Transportation Technical Report	68; right column; <i>Table 11 walking and bicycling mode share</i>	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
69	Active Transportation Technical Report	69; left column; <i>Strategic Plan</i> ; 1 st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.
70	Active Transportation Technical Report	79; <i>Table 12</i> ; last row	Requested edits: <u>OC Orange County</u> Active <u>Transportation Plan</u> <u>2019 In-Progress</u>

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
71	Active Transportation Technical Report	86; <i>Table 13</i> ; 1 st row	Requested edits: OC Orange County Active Transportation Plan <u>2019 In-Progress</u>
72	Aviation and Airport Ground Access Technical Report	7; right column; <i>Ontario International Airport (LAX)</i>	Replace “LAX” with “ONT”
73	Aviation and Airport Ground Access Technical Report	8; left column; <i>Ontario International Airport (LAX)</i> ; 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
74	Aviation and Airport Ground Access Technical Report	10; <i>Table 1</i>	Update table with applicable destination information. Air Canada is listed twice.
75	Aviation and Airport Ground Access Technical Report	22-23 and 31	Replace “2020-2040 RTP/SCS” with “2020-2045 RTP/SCS”
76	Congestion Management Technical Report	6; left column; <i>Roles and responsibilities of partner agencies</i> ; 1 st paragraph	Replace “SGAG” with “SCAG”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
77	Congestion Management Technical Report	11; <i>Aggregate regional and county trends</i> ; last paragraph; 1 st sentence	Replace “EXHIBIT” with “FIGURE”
78	Congestion Management Technical Report	22; left column; <i>Regional and county congestion trends</i>	Add references to Exhibit 1 and Table 3
79	Congestion Management Technical Report	22; right column; <i>County congestion management program trends</i> ; 1 st paragraph	<p>Requested edit:</p> <p>OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20192017. Orange County’s latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 20192017, the average AM peak-period ICU improved from 0.67 to 0.6000.64, a ten-nine percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.6300.64, a 12.5 an 11 percent improvement.</p>
80	Congestion Management Technical Report	23; <i>Non-recurrent congestion</i>	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
81	Congestion Management Technical Report	23; left column; <i>Non-recurrent congestion</i> ; 2 nd paragraph; 5 th sentence	Reconsider the statement, “This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion.” Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
82	Congestion Management Technical Report	31; right column; SCAG’s <i>role</i> ; 3 rd paragraph; 1 st sentence	Replace “Los Angeles region” with “Los Angeles County”
83	Congestion Management Technical Report	41; left column; <i>Ridesharing</i>	Replace “ExpressLane” with “express lane” ExpressLane is a Metro branding of the generic express lane.
84	Congestion Management Technical Report	41; right column; <i>Carpooling and vanpooling</i>	Suggested edit: Carpooling is <u>commonly defined as</u> when two or more people share a ride...
85	Congestion Management Technical Report	45; left column; 1 st paragraph; last sentence	Clarify years
86	Congestion Management Technical Report	47; right column; <i>New infrastructure</i>	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
87	Demographics and Growth Forecast Technical Report	2; left column; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
88	Demographics and Growth Forecast Technical Report	4; left column; <i>Forecasting process overview</i> ; 2 nd paragraph	Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November-October 2019.
89	Demographics and Growth Forecast Technical Report	7; <i>Table 3</i>	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
90	Demographics and Growth Forecast Technical Report	18; <i>Special focus: workplace automation and the gig economy</i>	It may be appropriate to address the implications of AB 5 here.
91	Demographics and Growth Forecast Technical Report	28; <i>Figure 11</i>	Verify that this is labeled correctly
92	Demographics and Growth Forecast Technical Report	29; <i>Table 13; Population</i>	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
93	Demographics and Growth Forecast Technical Report	42; <i>Table 15</i>	Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.
94	Economic and Job Creation Analysis Technical Report	1; right column; last paragraph	Suggested edit: Over the FY2020-21 through FY2044-45-2021-2045 period, our region is expected to invest more than \$603...
95	Economic and Job Creation Analysis Technical Report	5; right column; <i>Local (neighborhood) congestion and economic competitiveness</i> ; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
96	Economic and Job Creation Analysis Technical Report	9; <i>Table 1</i>	Missing fiscal year notation
97	Economic and Job Creation Analysis Technical Report	10; left column; <i>Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects</i> ; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
98	Economic and Job Creation Analysis Technical Report	10; <i>Table 2</i>	Missing fiscal year notation
99	Economic and Job Creation Analysis Technical Report	11; <i>Table 3</i>	Missing fiscal year notation
100	Economic and Job Creation Analysis Technical Report	11; right column; <i>Total jobs resulting from the investment spending and enhanced network efficiency</i> ; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
101	Economic and Job Creation Analysis Technical Report	12; <i>Table 4</i>	Missing fiscal year notation
102	Economic and Job Creation Analysis Technical Report	12; left column; <i>Conclusion</i>	Replace “2021-2045” with “FY2020-21 through FY2044-45”
103	Emerging Technology Technical Report	8; right column; <i>Ridehailing/transportation network companies (TNCs)</i>	It may be appropriate to address the implications of AB 5 here.
104	Environmental Justice Technical Report	5; <i>Table 1; Neighborhood change and displacement</i>	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
105	Environmental Justice Technical Report	7; <i>Table 1; Rail-related impacts</i>	Asterisks but no corresponding note.
106	Environmental Justice Technical Report	7; <i>Table 1; Impacts from mileage-based user fee</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
107	Environmental Justice Technical Report	14; left column; <i>Where should impacts be assessed?</i> ; last bullet	This should also include the local road charge program.
108	Environmental Justice Technical Report	19; left column; <i>How will impacts be analyzed?</i> ; 2 nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
109	Environmental Justice Technical Report	20; <i>Table 5</i>	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
110	Environmental Justice Technical Report	21; left column; <i>Historical demographic trends</i> ; 2 nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
111	Environmental Justice Technical Report	21; right column; <i>Historical demographic trends</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
112	Environmental Justice Technical Report	23; <i>Table 7; Total population</i>	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
113	Environmental Justice Technical Report	24; left column; <i>Demographic trends in EJ areas in the SCAG region</i> ; 1 st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.
114	Environmental Justice Technical Report	26; left column; <i>Demographic trends in SB 535 Disadvantaged Communities in the SCAG region</i> ; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
115	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 2 nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
116	Environmental Justice Technical Report	30; left column; <i>Expected future trends in EJ geographies</i> ; 3 rd paragraph; 1 st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
117	Environmental Justice Technical Report	45; left column; <i>Results</i> ; 2 nd paragraph; 1 st sentence	Clarify end of sentence—"...future Technical Report."

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
118	Environmental Justice Technical Report	46; right column; <i>Neighborhood change and displacement</i> ; 1 st paragraph; last sentence	Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?
119	Environmental Justice Technical Report	54; <i>Exhibit 13</i>	Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the “walkable corridor” characterization.
120	Environmental Justice Technical Report	73; right column; <i>Results</i> ; 2 nd paragraph; 4 th sentence	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.
121	Environmental Justice Technical Report	74; right column; <i>Accessibility to the San Gabriel National Monument</i>	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
122	Environmental Justice Technical Report	92-93; <i>Exhibits 21 and 22</i>	An EJ area overlay would be useful.
123	Environmental Justice Technical Report	95; left column; <i>Case study 1 – Advanced research on the built environment and collisions</i>	Suggest enhancing the linkage to EJ.
124	Environmental Justice Technical Report	99; <i>Exhibit 24</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
125	Environmental Justice Technical Report	101; <i>Exhibit 25</i>	An EJ area overlay would be useful.
126	Environmental Justice Technical Report	103; <i>Exhibit 26</i>	An EJ area overlay would be useful.
127	Environmental Justice Technical Report	114; right column; <i>Trends and dynamics of aviation noise in the SCAG region and beyond</i> ; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
128	Environmental Justice Technical Report	116; left column; <i>Roadway noise impacts</i> ; 1 st paragraph	<p>Verify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.</p> <p>Suggested edit:</p> <p style="padding-left: 40px;">...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...</p>
129	Environmental Justice Technical Report	120; <i>Exhibit 27</i>	Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?
130	Environmental Justice Technical Report	126-129; <i>Exhibits 28-31</i>	An EJ area overlay would be useful. Can resolution be improved?
131	Environmental Justice Technical Report	134-135; <i>Exhibits 32-33</i>	An EJ area overlay would be useful.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
132	Environmental Justice Technical Report	162; left column; <i>Results</i> ; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
133	Environmental Justice Technical Report	164; <i>Exhibit 34</i>	An EJ area overlay would be useful.
134	Environmental Justice Technical Report	165; <i>Impacts from funding through mileage-based user fees</i>	Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.
135	Goods Movement Technical Report	8; <i>Exhibit 1</i>	Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.
136	Goods Movement Technical Report	13; right column; <i>Highway system</i> ; last paragraph; 1 st sentence	What about I-710 and I-605?
137	Goods Movement Technical Report	28; right column; <i>Figure 12</i>	Capitalize "SCAG"
138	Goods Movement Technical Report	77; <i>Table 9</i> ; A.36; Project description and Project Cost	Requested edits: SRSr-57 from Lambert to <u>LA-La</u> County Line - Add 1 NBNb Truck Climbing Lane <u>\$167,550</u> \$124,600

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
139	Goods Movement Technical Report	77; Table 9; A.37; Project description	Requested edits: Add 1 HOV-Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)
140	Goods Movement Technical Report	77; Table 9; A.38; Project description	Requested edits: I-405 fromFrom SRSr -73 toTo I-605 - Add 1 MF-Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV-Hov toTo HOT-Hot . Add 1 Additional HOT-Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.
141	Goods Movement Technical Report	77; Table 9; A.39; Project description	Requested edits: I-5 (I-405 toTo SR-Sr -55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF-Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR-Sr -55, Add 1 MF-Mf Lane SBSb fromFrom SR-Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.
142	Goods Movement Technical Report	78; Table 9; A.40; Project description	Requested edits: SR-Sr -91: Add 1 MF-Mf Lane EBEb fromFrom SR-55 toTo SR-57 , And 1 MF-Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
143	Goods Movement Technical Report	78; <i>Table 9</i> ; A.41; Project description	Requested edits: SR-Sr -91 Add 1 Lane Each Direction from From SR-Sr -241 to To County Line, and And Other Operational Improvements. See Riverside County for For Additional Details. (Linked with With Riv071250b)
144	Goods Movement Technical Report	78; <i>Table 9</i> ; A.42; Project description	Requested edits: SR-Sr -57 - Add 1 MF-Mf Lane NBNb Between Orangewood and And Katella
145	Goods Movement Technical Report	78; <i>Table 9</i> ; A.43; Project description	Requested edits: Add 1 MF-Mf Lane Each Direction from From I-5 to To SR-Sr -55 and And Add SBSb Aux Lanes from From SR -133 to To Irv Ctr Dr
146	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S “ ” denotes column breaks starting with “County” column

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
147	Goods Movement Technical Report	78; <i>Table 9</i> ; Missing Project	Request adding missing project: Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M “ ” denotes column breaks starting with “County” column
148	Goods Movement Technical Report	99; <i>Exhibit 8</i>	Update map to reflect the addition of missing projects provided
149	Highways and Arterials Technical Report	1; right column; <i>Executive summary</i>	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
150	Highways and Arterials Technical Report	4; left column; <i>Regional significance</i>	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
151	Highways and Arterials Technical Report	6; <i>Exhibit 1</i>	The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 / SR-241 interchange.
152	Highways and Arterials Technical Report	20; <i>Programmed commitments</i>	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
153	Highways and Arterials Technical Report	21; <i>Table 5</i>	<p>Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”</p> <p>Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”</p>
154	Highways and Arterials Technical Report	23; <i>Exhibit 4</i>	<p>Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.</p> <p>Baseline Segment between El Toro and Alicia appear to be too long as mapped.</p>
155	Highways and Arterials Technical Report	24; <i>Exhibit 5</i>	<p>Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.</p> <p>The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.</p> <p>Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and Katella</p> <p>Missing Planned HOT Connector at SR-91 / SR-241 interchange.</p>
156	Natural and Farm Lands Conservation Technical Report	2; right column; <i>Introduction</i> ; last sentence	Verify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
157	Natural and Farm Lands Conservation Technical Report	7; right column; <i>Performance and outcomes</i> ; last sentence	How is "trend" defined for this Technical Report? Comparison to Baseline?
158	Natural and Farm Lands Conservation Technical Report	16; right column; <i>Orange County Central-Coastal NCCP/HCP</i>	Replace "Transportation Corridor Agency" with "Transportation Corridor Agencies"
159	Passenger Rail Technical Report	2; right column; <i>Importance to the regional transportation system</i> ; 2 nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
160	Passenger Rail Technical Report	4; right column; <i>Regional</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
161	Passenger Rail Technical Report	5; left column; <i>Modeling approach and ridership forecasting</i> ; 1 st paragraph; last sentence	Clarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
162	Passenger Rail Technical Report	6; left column; <i>Connectivity and gaps in service</i> ; 1 st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
163	Passenger Rail Technical Report	8; right column; <i>The Southwest Chief</i>	Provide applicable updates on replacement of rail service with charter bus service.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
164	Passenger Rail Technical Report	9; right column; <i>Metrolink</i> ; 1 st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
165	Passenger Rail Technical Report	11; <i>Exhibit 2</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
166	Passenger Rail Technical Report	14; left column; <i>Palmdale to Hollywood Burbank Airport</i>	Define "SAA"
167	Passenger Rail Technical Report	14; right column	Provide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.
168	Passenger Rail Technical Report	25; <i>Exhibit 5</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
169	Passenger Rail Technical Report	26; right column; <i>Placentia Metrolink Station</i>	Provide applicable update on start of construction.
170	Passenger Rail Technical Report	35; <i>Exhibit 7</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
171	Passenger Rail Technical Report	36; <i>Exhibit 8</i>	It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.
172	Performance Measures Technical Report	14; right column; <i>Analytical approach</i> ; 2 nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of the main book.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
173	Performance Measures Technical Report	51; <i>Table 16</i>	Suggest revising title to reflect criteria pollutant emission <u>reductions</u>
174	Performance Measures Technical Report	57; <i>Table 20</i>	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.
175	Performance Measures Technical Report	58; <i>Table 20</i>	<p>Replace “0.0%” with “N/A” for Trend for GHG emission reductions.</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>
176	Project List Technical Report	140; <i>Table 2</i>	<p>Request adding missing project:</p> <p>Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146</p> <p>“ ” denotes column breaks</p>
177	Project List Technical Report	239-242; <i>Table 2</i>	Request including asterisk to each of the regional initiatives with the following note, “Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal.”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
178	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.
179	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 1 st paragraph	Suggest reference to Baseline definition in Glossary of the main book
180	Public Health Technical Report	2; right column; <i>Executive summary</i> ; 2 nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.
181	Public Health Technical Report	45; <i>Table 5</i>	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book. Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?
182	Public Health Technical Report	46; <i>Table 5</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
183	Public Health Technical Report	49; <i>Table 8</i>	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.
184	Public Health Technical Report	52; right column; <i>Table 10</i>	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
185	Public Health Technical Report	56; left column; <i>Table 12</i>	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.
186	Public Participation and Consultation Technical Report	3; <i>Table 1</i>	Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.
187	Public Participation and Consultation Technical Report	7; right column; <i>Outdoor advertising</i> ; last sentence	Replace “seven-county” with “six-county”
188	Public Participation and Consultation Technical Report	9-10; <i>Tables 6-9</i>	Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.
189	Public Participation and Consultation Technical Report	11; left column; <i>Stakeholder working groups</i> ; 2 nd paragraph	Replace “Natural Land Conservation” with “Natural & Farm Lands Conservation”
190	Public Participation and Consultation Technical Report	11; right column; <i>Active transportation working group</i> ; 1 st paragraph	The 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.
191	Public Participation and Consultation Technical Report	12; right column; <i>Mobility innovations</i>	Indicate the number of meetings and dates held to be consistent with other working groups.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
192	Public Participation and Consultation Technical Report	13; right column; <i>Sustainable communities</i>	Indicate the number of meetings and dates held to be consistent with other working groups.
193	Sustainable Communities Strategy Technical Report	5; right column; <i>Recent growth</i>	Verify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.
194	Transit Technical Report	24-29; <i>Exhibits 1-6</i>	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
195	Transit Technical Report	76; left column; <i>Planned HQTCS</i> ; 2 nd paragraph	Replace “V4” with “Exhibit 14”
196	Transit Technical Report	84; <i>Planned HQTCS and major transit stops</i> ; left column; last line	Replace “V4” with “Exhibit 14”
197	Transportation Conformity Technical Report	21; right column; <i>Connect SoCal No Build</i>	Correct years of FTIP.
198	Transportation Conformity Technical Report	44; left column; <i>2007 Ozone SIP</i> ; last line	Revise reference for more information on TCMs and timely implementation of TCMs.

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
199	Transportation Conformity Technical Report	86-91; <i>Table 65</i>	ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.
200	Transportation Finance Technical Report	9; <i>Table 2; Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?
201	Transportation Finance Technical Report	10; <i>Table 3.1; Local option sales tax measure</i>	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
202	Transportation Finance Technical Report	10; <i>Table 3.1; Highway tolls</i>	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.
203	Transportation Finance Technical Report	25; <i>Table 8</i>	Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”
204	Transportation Finance Technical Report	38; left column; <i>Local road charge program</i>	Is the local road charge program indexed to maintain purchasing power?

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
205	Transportation Safety and Security Technical Report	29; left column; <i>Reduce aggressive driving and speeding</i>	<p>Suggested edit:</p> <p>Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Conducting</u> public outreach... • Local jurisdictions should <u>Identifying</u> locations with... • Local jurisdictions should <u>Promoting</u> best engineering... • Local jurisdictions should <u>Setting</u> speed limits that are safe...
206	Transportation Safety and Security Technical Report	29; right column; <i>Improve safety for aging populations</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> roadway, intersection... • Local jurisdictions should <u>Promoting</u> implementation of... • Local jurisdictions should <u>Implementing</u> design treatments... • Local jurisdictions should <u>Working</u> with Transit network... • Local jurisdictions should <u>Establishing</u> Safe Routes for ...”

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
207	Transportation Safety and Security Technical Report	30; left column; <i>Improve bicyclist safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> connecting bicycle... • Local jurisdictions should <u>Developing</u> and implement... • Local jurisdictions should <u>Adopting</u> Complete Streets... • Local jurisdictions should <u>Implementing</u> pedestrian and... • Local jurisdictions should <u>Using</u> intersection control... • Local jurisdictions should <u>Conducting</u> bicycle education... • Local jurisdictions should <u>Supporting</u> expanding Safe... • Local jurisdictions should <u>Utilizing</u> SCAG's ... • Local jurisdictions should <u>Implementing</u> traffic calming... • Local jurisdictions <u>Where</u> applicable, should developing a... • Local jurisdictions should <u>Participating</u> in programs to...
208	Transportation Safety and Security Technical Report	31; left column; <i>Improve commercial vehicles safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Supporting</u> the use of dedicated... • Local jurisdictions should <u>Identifying</u> intersections and... • Local jurisdictions should <u>Identifying</u> and promote the... • Local jurisdictions should <u>Identifying</u> rest stops along...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
209	Transportation Safety and Security Technical Report	32; left column; <i>Reduce distracted driving</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Developing</u> enforcement and... • Local jurisdictions should <u>Improving</u> data quality on... • Local jurisdictions should <u>Conducting</u> education on the...
210	Transportation Safety and Security Technical Report	32; right column; <i>Ensure drivers are licensed</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> educational... • Local jurisdictions should <u>Creating</u> a public... • Local jurisdictions should <u>Supporting</u> the State...
211	Transportation Safety and Security Technical Report	32; right column; <i>Improve emergency response services</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Using</u> Intelligent... • Local jurisdictions should <u>Developing</u> guidance...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
212	Transportation Safety and Security Technical Report	34; left column; <i>Improve research and data collection</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> data collection... • Local jurisdictions should <u>Identifying</u> high injury... • Local jurisdictions should <u>Working</u> with the State... • Local jurisdictions should <u>Working</u> with transit network...
213	Transportation Safety and Security Technical Report	34; left column; <i>Reduce impaired driving fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Promoting</u> and expand... • Local jurisdictions should <u>Extending</u> and promote... • Local jurisdictions should <u>Developing</u> a methodology... • Local jurisdictions should <u>Developing</u> and distribute... • Local jurisdictions should <u>Designing</u> and develop a... • Local governments should <u>Improving</u> enforcement... • Local jurisdictions should <u>Increasing</u> frequency,...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
214	Transportation Safety and Security Technical Report	35; left column; <i>Improve safety at intersections</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety at intersections <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • <u>Incorporating</u> intersection safety into the planning grant strategy. • Local jurisdictions should <u>Incorporating</u> Intelligent... • Local jurisdictions should <u>Implementing</u> infrastructure... • Local jurisdictions should <u>Implementing</u> installation of... • Local jurisdictions should <u>Planning</u> for, and develop... • Local jurisdictions should <u>Reducing</u> modal conflicts at...
215	Transportation Safety and Security Technical Report	35; left column; <i>Reduce the occurrence of lane departure fatalities</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> the deployment... • Local jurisdictions should <u>Addressing</u> systemic risks... • Local jurisdictions should <u>Improving</u> the dissemination... • Local jurisdictions should <u>Targeting</u> highest risk... • Local jurisdictions should <u>Implementing</u> an effective... • Local jurisdictions should <u>Promoting</u> the use of...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
216	Transportation Safety and Security Technical Report	36; right column; <i>Improve motorcycle safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Working</u> with the state... • Local jurisdictions should <u>Working</u> with local governments... • Local jurisdictions should <u>Promoting</u> the most significant...
217	Transportation Safety and Security Technical Report	37; left column; <i>Improve occupant protection by increased use of seat belts and child safety seats</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Increasing</u> enforcement and... • Local jurisdictions should <u>Implementing</u> education... • Local jurisdictions should <u>Promoting</u> the establishment... • Local jurisdictions should <u>Improving</u> occupant protection...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
218	Transportation Safety and Security Technical Report	37; right column; <i>Improve pedestrian safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Continuing</u> to work with local jurisdictions to provide a... • Local jurisdictions should <u>Developing</u> pedestrian safety... • Local jurisdictions should <u>Ensuring</u> all sidewalks and... • Local jurisdictions should <u>Supporting</u> improvements to... • Local jurisdictions should <u>Considering</u> pedestrian needs in... • Local jurisdictions should <u>Facilitating</u> the planning... • Local jurisdictions should <u>Increasing</u> pedestrian crossing... • Local jurisdictions should <u>Incorporating</u> pedestrian... • Local jurisdictions should <u>Participating</u> in programs... • Local jurisdictions should <u>Improving</u> pedestrian striping... • Local jurisdictions should <u>Incorporating</u> median... • Local jurisdictions should <u>Considering</u> installation of... • Local jurisdictions should <u>Developing</u> citywide Safe... • Local jurisdictions should <u>Continuing</u> to improve...
219	Transportation Safety and Security Technical Report	38; left column; <i>Improve work zone safety</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Improving</u> safe driving... • Local jurisdictions should <u>Applying</u> advanced technology ... • Local jurisdictions should <u>Improving</u> work zone data...

**2020 RTP/SCS
OCTA Technical Comments**

#	Chapter / Technical Report	Page and location	Comment
220	Transportation Safety and Security Technical Report	38; right column; <i>improve safety for young drivers</i>	<p>Suggested edit:</p> <p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> • Local jurisdictions should <u>Establishing</u> a task force to... • Local jurisdictions should <u>Implementing</u> the Driver... • Local jurisdictions should <u>Supporting</u> state authorities... • Local jurisdictions should <u>Implementing</u> and maintain... • Local jurisdictions should <u>Establishing</u> efforts to address...



City of Long Beach
Department of Health
and Human Services

Los Angeles County
Department of Public Health

City of Pasadena
Public Health Department

Riverside University
Health System – Public Health

Santa Barbara County
Public Health Department

County of San Bernardino
Department of Public Health

County of San Diego
Health and Human Services
Agency

Ventura County
Public Health

Bill Jahn, President
Regional Council
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

January 24, 2020

RE: Comments on Connect SoCal 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy

Dear President Jahn:

The [Public Health Alliance of Southern California](#) (Alliance) is a coalition of executive leadership of local health departments in Southern California. Collectively, our members have statutory responsibility for the health of nearly 50% of California's residents. We focus on multi-sector policy, systems and environmental change to improve population health and equity.

Our health departments are committed to realizing a vision in which all Southern California communities are vibrant and activated communities achieving health, justice and opportunities for all. We have been active participants in development of the Connect SoCal 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy ("the Plan") as part of our efforts to achieve this goal. We regularly participate in several of the Regional Planning Working Groups and have provided feedback throughout the development of the Plan, including the Active Transportation, Public Health, Environmental Justice, Transportation Safety, Climate Adaptation and Resilience and Technical Working Groups. We are very pleased to see such a strong emphasis on public health, health equity, and climate vulnerability in this draft Plan compared to previous plans, and are committed to working with you and SCAG staff to ensure implementation of this Plan.

With that in mind, we offer the following comments on the draft Plan for your consideration.

Overarching Comments

Every 4 years, we are pleased to see SCAG make considerable progress on better incorporating public health, health equity and climate change into its Plan. This draft Plan represents a transformative shift in our region's transportation investments to create healthier, more equitable, and climate resilient communities. We are pleased to see that the plan does the following:

- Takes a Health in All Policies approach to Public Health, focusing on the social determinants of health and integrating public health considerations into all elements of the Plan.
- Includes overarching goals focused on improving public health (Goal #6, Support healthy and equitable communities) and addressing climate change (Goal #7, Adapt to a changing climate and support an integrated regional development pattern and transportation network")



- Invests almost double the amount of funding in active transportation (\$22.5 billion) compared to the previous plan (\$12.9 billion). These additional investments in walking and bicycling infrastructure and programs will have a significant impact on our region's health and well-being.
- Projects increasing active transportation mode share from 8.3% to 10.2% by 2045.
- Continues support for non-infrastructure active transportation programs such as Go Human, Safe Routes to School and local transportation safety efforts, both in-house at SCAG and in the region's local health departments and other government agencies.
- Meets the greenhouse gas emissions reductions targets established for the region by Senate Bill 375 (8% in 2020, 19% in 2035) and reduces vehicle miles traveled per capita by 4.5%.
- Provides quantifiable performances of health impacts from implementing the Plan by 2045, including health care cost savings (\$350 million for chronic disease related incidences, \$138 million for air quality-related incidences), reduced incidences of chronic disease (80,000 combined cases for high blood pressure, heart disease and type 2 diabetes), active transportation mode share (22% increase in walking and 50% increase in biking), and air quality improvements (3.8% reduction in PM_{2.5} emissions) .
- Includes a robust Public Health Technical Report with robust data on how the Plan will improve health outcomes, including baseline data and projections to 2045.
- Provides a strong list of actionable strategies for local communities to elevate public health, equity and climate change in their planning efforts. The Alliance worked with SCAG staff through its participation in the Public Health Working Group to refine these strategies and are pleased to see our recommendations have been incorporated.
- Provides an inventory of local communities that have created plans with a strong public health framing, as well as those that have created active transportation plans. This will be a highly useful resource to our local health departments and partners in ensuring we are coordinated in our planning and where we could fill important gaps.
- Utilizes the Alliance's California Healthy Places Index in multiple sections, including maps of the region showing HPI scores, life expectancy, the social determinants of health and specific chronic disease rates.

Recommendations for Strengthening the Plan

While we are encouraged by all of the above, the Plan could be strengthened in the following ways:

Incorporating the [California Healthy Places Index \(HPI\)](http://www.healthyplacesindex.org) in Additional Sections of the Plan

- The [California Healthy Places Index \(HPI\)](http://www.healthyplacesindex.org), available at www.healthyplacesindex.org, is a data and mapping tool developed by the Alliance that allows users to explore underlying local factors associated with life expectancy and to compare community conditions statewide, at multiple geographies down to the Census tract level. The HPI provides overall scores for communities and more detailed data on specific policy action areas that address the social determinants of health, such as housing, economic opportunity, education, transportation, neighborhood characteristics, and more. The HPI is currently used by nearly 90 agencies, businesses and community groups using HPI to integrate public health into their work, and more than \$450 million in funding has been made available for regional and State grant programs using HPI, including SCAG as part of its SCAG's own [Sustainable Communities Grants application](#).
- We are encouraged to see maps and data from HPI in several sections of the Plan, including the Active Transportation Technical Report, and have been encouraged by SCAG using HPI as part of its Sustainable Communities Planning Grant selection criteria. However, the Public Health Technical Report only includes a mention of HPI on page 13 without use of the data in any tables, maps or other visualizations like other datasets. Given the Plan's focus on the social determinants of health and health equity, we recommend incorporating HPI score maps, as well as maps of several of the indicators and decision support layers that represent the social determinants of health that are the focus of the Public Health Technical Report, such as housing (Housing Policy Action Area indicators), air quality (Environment Policy Action Area indicators),

economic opportunity (Economic Policy Action Area indicators) and Climate Change (Climate Vulnerability decision support layers). We also recommend adding tables with additional public health information available in HPI to the Technical Report. This will ensure that the implementers of this Plan have a wide range of information available as they consider public health and health equity impacts of their decision-making in the region.

- HPI scores should be added as an additional “Environmental Justice Area” in the Environmental Justice Technical Report. HPI scores are available at similar geographies to these existing maps and can provide an additional health equity lens to the Environmental Justice analysis and help with identification of disadvantaged communities and where cities and counties in the region should be prioritizing investments to address environmental justice issues that intersect with health equity issues.
- We also recommend reviewing and incorporating the strategies and policies identified in the 30 [HPI Policy Action Guides](#) in several sections: the Environmental Justice Toolbox, which is lacking many examples from a public health and health equity perspective, as well as the Strategies sections of Active Transportation and Public Health Technical Reports.

Greater Alignment of the Environmental Justice Technical Report with Other Parts of the Plan

- The performance measures in the Environmental Justice Technical Report should provide quantifiable targets like the rest of the Plan, instead of directional measures of “Improve” or qualitative descriptions.
- We appreciate the inclusion of the General Plan Elements (GPE) discussion and icons throughout the Environmental Justice Technical Report to support the SB 1000 requirement. However, in order to support progress and alignment throughout the SCAG region, we recommend including a strategy that outlines a process for cities and counties to amend their General Plans to reflect the goals and strategies in Connect SoCal, especially those in the Environmental Justice Technical Report. This will ensure greater consistency between local and regional plans, which is often a requirement for State grant funding.
- The Environmental Justice Technical Report should more explicitly align with other sections of the Plan that focus on equity. For example, the Public Health Technical Report focuses on the Social Determinants of Health yet these are barely mentioned in the Environmental Justice Technical Report. In order to promote greater coordination and collaboration between the practitioners and stakeholders who will ultimately be responsible for implementing this plan, these sections should be better aligned and reflect the data, strategies, goals and other elements identified in each section.
- As mentioned above, data from the [California Healthy Places Index](#), as well as the California Department of Public Health’s [Climate and Health Vulnerability Indicators](#) should be incorporated in this section when discussing public health and climate vulnerability, respectively. Currently, only CalEnviroScreen 3.0 is used to analyze these topics, which is inconsistent with the reference to the California Healthy Places Index and Climate and Health Vulnerability Indicators in with the Public Health, Active Transportation and other sections of the Plan.
- In order to improve the readability of the Technical Report we recommend greater clarity between the narrative and summary statements and the specific data tables. For example, the narrative on page 3 states “regional and local emissions impact shows adverse impacts at the local level for certain regions but improvements at a regional level,” however Table 1 *Emissions Impact Analysis* appears to show improvement for all EJ areas, it is unclear whether the adverse impacts at the local level are due to freeway and roadway exposure or not. Similarly, the Technical Report narrative states that “EJ communities incur a higher risk of adverse impacts for active transportation hazards, climate vulnerability and public health,” but the summary in Table 1 only provides narrative on *current conditions* for these topics. We recommend adding detail on specific geographic areas where these impacts will occur, and providing a clearer understanding on the connection between the Plan components and any potential negative outcomes for EJ communities.

- In order to provide additional clarity on the findings on emissions impacts, the Technical Report could include more narrative to explain the findings in Tables 41-44; in one section the analysis states “COC areas show *less improvement* in CO and PM2.5 compared to the region,” however page 123 says there will be areas that experience *increases* in PM 2.5 and CO emissions due to the plan. We recommend including additional narrative to clarify the issue.

Elevated Discussion of Climate Change

- We are pleased to see an elevated focus on climate change compared to the last Plan. However, we recommend that SCAG consider creating a standalone Technical Report devoted to Climate Change in order to provide specific data and strategies for addressing climate change in the SCAG region. Review and incorporation of jurisdiction climate action plans, climate adaptation plans, and/or sustainability plans may help guide the development of a Climate Change Technical Report. In addition, the discussion of climate change focuses on a narrow set of climate-related events such as wildfires and sea level rise. These discussions could benefit from a broader focus on climate adaptation and resilience, especially how they relate to the changing demographics of the region.
- In the Public Health Technical Report under the Climate Change Expanded Analysis Section there should be greater emphasis on the importance of active transportation and public transit accessibility as a community climate resilience and health equity strategy, not solely as a climate mitigation strategy (via VMT reduction). Additionally, we recommend the inclusion of an analysis of the potential cost savings of more resilient active transportation and public transit systems in the projected climate scenarios.
- In order to further address the nexus between public health, regional transportation plans, and climate change, we recommend explicitly addressing the public health risks of active transportation modes during extreme heat events, poor air quality days, and wildfire season. Similarly, we recommend including consideration of the importance of transportation needs, especially evacuation protocols, of vulnerable populations (e.g. elderly, disabled, socially isolated) during a climate- related event.
- In order to increase the emphasis on the climate adaptation and resilience, we recommend including current regional, local, and community-based climate resilience efforts within the Existing Conditions section, specifically the sub-sections that are directly related to climate change (e.g. Access to Parks and Open Space, Air Quality, Smoke and Wildfires, etc.). Similarly, we recommended the inclusion of more specific data related to the disproportionate burden faced by low-income and communities of color due to current and future climate impacts (e.g. poor air quality, asthma rates, homes in inundation areas, etc.).
- We applaud the thoughtful consideration of the plan implementation strategies and actions. We propose the inclusion of HPI as a strategic tool to further Strategy 2, Action D. In order to advance the goals of Strategy 2 for Local Jurisdictions and Partners, and Strategies throughout the Plan and Technical Reports, we recommend including explicit language about providing financial support to community-based partners and community members for their engagement in stakeholder meetings and coalitions throughout the continued refinement, implementation, and evaluation of the Plan.

Greater Investments in Active Transportation:

- Active transportation investments, which are almost double compared to the previous Plan, still represent a small percentage (approximately 3.5%) of the overall Plan. While this reflects available funding for active transportation and is aligned with current mode shares, it is still an insufficient amount to increase the number of people walking and bicycling in the region, and more investments will be needed to meet the region’s SB 375 targets. We urge SCAG and its members to identify additional ways to invest in active transportation to support a healthier region, and to identify strategies to increase support in areas where these projects are facing opposition.

Data Collection

- We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the “Daily amount of walking and biking related to work and non-work trips” and the “Collision rates by severity and mode.” We encourage cities and counties to collaborate with SCAG, Public Safety Departments, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts and benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes.
- In order to provide more information and context to local jurisdictions, we recommend including additional data and evaluation strategies related to the impacts of active transportation, including; an analysis and model of the safety impacts of active transportation; a return on investments analysis for investments in active transportation infrastructure and technology; and a recommendation to systematically install automated counters along bike paths and other active transportation thoroughfares.
- We also urge SCAG to establish more meaningful targets for many of the goals in the Plan other than “improvement over baseline.” While the Plan touts the benefits of making the proposed transportation investments, this Plan covers a long range of time where more ambitious targets could be established and strived for by SCAG and its member cities and counties. The target-setting process for the Federal Highway Administration’s Safety Performance Measures was a good standard to follow and should be considered for other goals in the Plan, so we have greater accountability for meeting these goals.

Thank you for taking the time to consider our comments. We are happy to offer any assistance on incorporating the California Healthy Places Index in additional sections of the Plan, as well as addressing on public health, health equity or climate change as you implement Connect SoCal. Should you have any questions or clarifications on the recommendations offered above, please contact Tracy Delaney, Executive Director of the Alliance at [REDACTED]

Sincerely,

Tracy Delaney, PhD
Executive Director, Public
Health Alliance of Southern
California

Kelly Colopy, MA
Director, City of Long Beach
Health and Human Services
Department

Kim Saruwatari, MPH
Director, Riverside University
Health System – Public Health



www.railpac.org

January 18, 2020

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

Re: Connect SoCal 2020 RTP/SCS, Passenger Rail Technical Report

Dear Connect SoCal Team:

The Rail Passengers Association of California & Nevada (RailPAC) welcomes the opportunity to provide input to the Connect SoCal 2020 Regional Transportation Plan/Sustainable Communities Strategy. The Southern California Association of Governments (SCAG) is in a unique position to encourage the state, county and local governments to work together to improve passenger rail service in Southern California.

RailPAC offers the below comments on the Connect SoCal Passenger Rail report.

The Passenger Rail report's Vision and Purpose (p. 2) sets a very positive tone for passenger rail in the SCAG region over the next few decades, with goals to grow ridership and provide more frequent, and new, rail services.

RailPAC has always focused on intercity passenger service and regional rail. While it is important to move large numbers of people short distances by transit, it is equally beneficial to the community to move smaller numbers of passengers over relatively longer distances. An intercity train journey of 70 miles or more is the equivalent to 13 transit journeys in terms of vehicle miles avoided. Investment in Intercity and Regional Rail in the SCAG region has been totally inadequate for the past three decades. We still are trying to operate a modern service with many miles of single-track railroad. The approach to Los Angeles Union Station, the hub of the network, is circuitous and serpentine, unnecessarily adding 5 to 10 minutes to every journey. A bypass track is needed to avoid the near sea level alignment through San Clemente, a serious capacity constraint on the key route between California's two largest cities.

Detailed comments:

Metrolink SCORE (pgs. 34-41)-

The Metrolink SCORE program is a welcome and long overdue step forward. It can transform Metrolink from a commuter-oriented system (focused on rush hour service to Downtown LA and Irvine) to a truly regional rail system with frequent service in all directions, 7 days a week, from early in the morning to late at night.

These SCORE projects need to expedited, and funding needs to be clearly identified:

- Laguna Niguel/Mission Viejo Siding (OCTA)
- Raymer to Bernson Double Track (LA Metro)

- Brighton to Roxford Double Track (LA Metro)
- Doran Street Grade Separation (LA Metro)
- Lone Hill to White Double Track (LA Metro)
- Placentia Metrolink Station (OCTA)

LOSSAN Corridor Rail Service (pg. 28), San Diego to Orange County market:

SCORE needs to be integrated with LOSSAN and Surfliner. Due to the huge amount of traffic exchanged between SCAG and SANDAG every day, there should be a pooled Coaster/Metrolink additional service San Diego to Fullerton (stopping at Fullerton avoids the frequency conflict on the BNSF with the 91 line slots). The pool trains would connect to the Metrolink 91 and Orange County line trains at Fullerton, on continue to LA Union Station. SCAG and the LOSSAN agency should actively encourage this pooling of Metrolink and Coaster rolling stock and services, and start a working group on it with NCTD or SANDAG. Such a working group would figure out technical issues such as equipment compatibility between Coaster and Metrolink, voltage of hotel power, position of wheelchair ramps, position of locomotive on the train, etc.

New passenger rail services (pgs. 27-28)-

- Los Angeles to Coachella Valley-
This service is long overdue. There is an urgent need to start discussions with UP on the infrastructure upgrades needed. For the distance involved and the kind of traffic an **intercity** service similar to *Surfliner* is appropriate, rather than Metrolink regional rail.
- Victorville to Las Vegas/High Desert Corridor-
SCAG should work with Los Angeles County, San Bernardino County, and Virgin Trains USA to connect the Victorville-Las Vegas train to the Palmdale station via the proposed High Desert Corridor.
- Coast Daylight/ Coast Rail Coordinating Council (CRCC)
RailPAC supports restoration of the Coast Daylight if a competitive transit time can be achieved.
- Southwest High-Speed Rail Network (pgs. 28-30)
The 2014 study recommended a CA-AZ-NV volunteer passenger rail policy and planning group, and a 'blue ribbon commission' to study a Phoenix-Southern California Corridor. RailPAC would like to participate in this, if such a commission is created to start implementing an LA-Phoenix service (and not just another study).

Amtrak-

Pg. 8.

Exhibit 1 Amtrak services - Why not show Amtrak stations on the map?

Pg. 9-

Needs updating after passage of SB742 re Thruway busses.

The report does not explain the extensive State role in LOSSAN and refers to the service as "Amtrak's Pacific Surfliner".

Pg. 22- *Pacific Surfliner* On-Time-Performance (OTP):

The Surfliner OTP statistics need tighter metrics than 10 minutes or 15 minutes off of schedule.

The Metrolink OTP standard (pgs. 22-23) is 6 minutes off schedule.

Not surprisingly, the report makes no mention of the pitifully small market share of both intercity or commuter rail, nor does it mention the lack of connectivity between Metrolink routes at LA Union Station. 3 million a year is about 4100 round trips a day, 8200 single rides, in a population catchment of at least 16 million. That's not even a rounding error (0.06%). 46 mph and 69% OTP factor in.

Metrolink's story on pgs. 22 and 23 is similar, a tiny percentage of journeys in the region. Also, the definition of commuter rail (pg. 11) is completely out of date with modern travel patterns and needs to be updated to a definition of "regional rail".

Hollywood Burbank North Station (pg.24) - the airport no longer provides a shuttle to meet every train, on demand only. The station will not be used by HSR and will most likely be demolished when the second track is added.

California High Speed Rail (pgs. 12-15)-

SCAG should press for completion of the Southern California tunnels as soon as possible. First priority is Antelope Valley to San Fernando Valley which will initiate high speed regional service.

Los Angeles to San Diego - this Phase Two section needs to be accelerated, especially in light of the ongoing erosion of the Del Mar bluffs. In addition, the existing LOSSAN route needs a bypass track to take the line away from the near sea level section at San Clemente. This single track is both vulnerable to sea level rise and is a serious capacity bottle neck.

Locomotives-

The paragraph 'Tier 4 Locomotives and Electrification' (pg. 12) implies that the 40 diesel F125 locomotives purchased recently will be the only locomotives that Metrolink will operate for the next 30 years. However the quantity of 40 locomotives is not nearly enough for the level of service increases that Metrolink is proposing over the next 10 years. Metrolink is expecting rapid growth in its train frequency, under its SCORE funding plan the Orange county line currently at less than 1 train per hour (13 trains per day), will have minimum frequencies of 2 trains per hour in 2025 and 4 trains per hour by the 2028 Olympics, for example. The existing fleet of several dozen diesel locomotives is not enough to support this growth. Even if Metrolink had the amount of diesel locomotives needed, it still doesn't justify delaying electrification. Continuing to run a 100% diesel fleet for the next two decades will not be environmentally or socially acceptable. At the very least a hybrid solution of a battery locomotive supplementing a diesel will help meet air quality and carbon goals.

There need to be more federal, state and locally-funded programs that could support zero-emission locomotive research and development (R&D) projects and technology demonstration projects. There are plenty of incentives and R&D programs, at both the state and federal levels, supporting electric cars and trucks. By contrast, public R&D funding opportunities for electric rail technologies are few and far between. Southern California should be a leader in zero-emissions, electric rail technology, and SCAG could be a major advocate for this technology.

Freight Rail Operations (pgs. 16-17)-

It is commendable that SCAG recognizes that freight rail infrastructure investments have great public benefit. RailPAC fully supports expansion of freight rail capacity and new grade separations on shared corridors, as this will reduce potential for congestion conflicts and delays to passenger trains. More capacity also allows more passenger trains to run.

One issue that needs attention is the safety and reliability impacts of Precision Scheduled Railroading (PSR) practices of several of the Class I railroads, notably Union Pacific (UP) in Southern California. UP in particular is adopting so-called PSR to cut costs, running longer and heavier trains, two miles or more in length, which are slower to accelerate. There are several reasons that the longer trains are not in the public interest. First of all, the waiting times for vehicles and pedestrians at the various UP railroad crossings on roads and streets in the SCAG region are getting longer. This inconveniences the public (hundreds of people at a time), creates more pollution from idling vehicles, and harms the flow of local commerce. It also makes it more difficult to share the tracks with passenger trains, which end up running late because of long slow trains taking up so much space on the rails. PSR's focus on short term profit is a danger to the future of rail transportation, and is leading to corners being cut on safety. Over 100 long freight trains pass through the SCAG region each day.

The use of the term "freight railroads" is inappropriate and misleading. "Common Carrier Class I Railroads" should be used.

Thank you for your consideration.

Sincerely,

SIGNED

Paul Dyson
Vice President, Southern California
Rail Passengers Association of California & Nevada (RailPAC)

Rail Propulsion Systems LLC
[REDACTED]
[REDACTED]
[REDACTED]

January 24, 2020

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

Connect SoCal 2020 SCAG Regional Transportation Plan/Sustainable Communities Strategy

Dear Connect SoCal Team:

Rail Propulsion Systems (RPS) is a Fullerton-based company providing *Practical Modernization* retrofit systems for passenger and switcher locomotives. These include exhaust after-treatment systems to lower the emissions of legacy diesel locomotives and also diesel to battery conversions to provide electrification options with minimal infrastructure investment. The after-treatment retrofit system reduces the emissions of both engines in a conventional passenger locomotive and is called the Blended After-Treatment System (BATS). RPS has a very broad patent on this system and it is already EPA certified. As a transition into the electrified passenger rail market, RPS will be offering diesel to battery conversion systems for smaller low speed switcher locomotives.

As a company based in the SCAG region, we welcome the opportunity to provide input to the regional planning process.

RPS offers the below comments on the Connect SoCal 2020 Regional Transportation Plan/Sustainable Communities Strategy- Passenger Rail and Goods Movement technical reports.

Comments on Passenger Rail technical report:

There is a great need for near-zero and zero-emissions locomotives in Southern California. Even though Tier 4 diesel locomotives are significantly cleaner than older ones, they are still enormously dirty compared to an electric locomotive. They still consume fossil fuels and generate significant emissions. Recent studies have shown the health impacts of diesel locomotives to passengers and crew to be significant, and the health impacts of ultrafine particulate emissions (even from a 'clean' diesel) are only beginning to be understood.

The paragraph 'Tier 4 Locomotives and Electrification' (pg. 12) implies that the 40 diesel F125 locomotives purchased recently will be the only locomotives that Metrolink will operate for the next 30 years. However the quantity of 40 locomotives is not nearly enough for the level of service increases that Metrolink is proposing over the next 10 years. Metrolink is expecting rapid growth in its train frequency, under its SCORE funding plan the Orange county line currently at less than 1 train per hour (13 trains per day), will have minimum frequencies of 2 trains per hour in 2025 and 4 trains per hour by

Rail Propulsion Systems comments on Connect SoCal 2020 RTP/SCS

the 2028 Olympics, for example. The existing fleet of several dozen diesel locomotives is not enough to support this growth. Even if Metrolink had the amount of diesel locomotives needed, it still doesn't justify delaying electrification. Continuing to run a 100% diesel fleet for the next two decades will not be environmentally or socially acceptable. At the very least a hybrid solution of a battery locomotive supplementing a diesel will help meet air quality and carbon goals.

Comments on Goods Movement technical report:

The level of investment that the railroads and government agencies are making into the region's freight rail network is impressive (Rail Strategies, pgs. 40- 46). With \$14.5 billion targeted for the proposed rail projects, a significant portion of this will likely come from public sources. To accelerate the commercial availability of cleaner locomotive technologies, public funding will be required to put pilot fleets of advanced locomotives into service to demonstrate the equipment's viability. The mainline, port area rail, railyard and grade separation projects are worthy of public support, given the economic and public benefits to the region. In order to maximize this support, government agencies should leverage their contributions to railroad companies to encourage the best available cleaner locomotive technologies, with an eventual goal of zero-emissions.

Freight Rail Emissions Reduction Strategies-

Less than 5% of non-electrified Rail activity within the SCAG region is conducted with Tier 4 or better locomotives (p. 62), and CARB has presented data that the locomotive inventory is going backwards with older equipment being brought back into service as it is more capable and maintainable than newer low emissions locomotives. Further, Metrolink is reporting that their new Tier 4 fleet is using more fuel than anticipated, which means greater carbon emissions than anticipated. While Tier 4 diesels significantly reduce emissions compared to legacy diesel locomotives, Tier 4 locomotives still emit 6.5 times the NOx and 30 times the PM emissions of 2010 and newer on-road trucks and are not a viable long-term solution to improve air quality.

After-treatment systems to make diesel locomotive emissions cleaner (p. 126, Near-Term Emissions Reduction Strategies), are a "bridge" to zero emissions vehicles, but the systems installed on some Tier 4 platforms are potentially a bridge to nowhere. Many of the new high speed four cycle diesel engines cannot be upgraded easily for alternative fuels that would allow them to achieve Tier 5 or greater emissions reductions. Interestingly, older 2 cycle medium speed engines can be converted to alternative fuels such as natural gas. It is really disappointing that so much effort and money has been wasted developing a new Tier 4 diesel engine when, with some ingenuity the same results can be obtained with existing 2-stroke engines. When combined with an after treatment system, a legacy medium speed locomotive engine converted to natural gas can attain Tier 5 or better emissions reduction. This would allow passenger rail agencies to greatly reduce their emissions and continue to operate existing reliable equipment until equivalently capable and reliable near zero or zero emissions solutions are market ready. For medium range applications such as short freight lines and commuter rail, this issue has significant importance.

Fully zero-emission electric locomotives need to be introduced in the SCAG region where the technology is appropriate today. Applications such as railyard switchyard locomotives are an ideal opportunity.

Rail Propulsion Systems comments on Connect SoCal 2020 RTP/SCS

Technologies in Development (pgs. 127-128):

Natural gas either compressed (CNG) or liquefied (LNG), is an excellent low emissions transition fuel to develop a hydrogen infrastructure for heavy duty applications in the future. This come with the assumption the implementation and operation of the natural gas infrastructure is managed adequately as unburned methane is a potent greenhouse gas and leaks from venting and filling errors are of serious concern both for the environment.

Long-Term Emissions Strategies for Rail-

The so-called 'long term' electrification strategies can actually start being deployed in the short and medium term.

This section mentions how in late 2017, the California Air Resources Board awarded funding to a demonstration project at the Port of Los Angeles, in partnership with Pacific Harbor Lines, of a battery-electric/natural gas hybrid locomotive developed by VeRail Technologies. However, this project was not completed as VeRail has since ceased operations. This is failed project, and reference to it should be removed.

The paragraph 'Options for Zero-Emissions Operation' (pg. 128) omits the technology of all battery-electric locomotives. While a hybrid electric locomotive is mentioned briefly, in practice an all-battery, zero-emissions locomotive can be paired with an existing diesel locomotive to operate has a hybrid pair. This is a viable option for zero-emissions locomotive track miles of operation in the SCAG region. Battery-electric locomotives could also be easily used as switchers in railyards. Such operation within a railyard avoids the operational (locomotive change-out) and range limitations which would make battery operation a challenge for line-haul freight and regional passenger trains. Zero-emissions switcher locomotives would also directly replace existing diesel switchers, which are typically the oldest and dirtiest locomotives in a railroad fleet. These dirty locomotives in urban railyard service have a disproportionate impact on neighboring communities, so replacing them with electric switchers would have significant public health benefits.

The 'Goods Movement Technologies' sections of the Connect SoCal Emerging Technologies chapter should discuss electric rail, along with new intermodal rail car technologies which will encourage mode shift from truck to rail.

Battery Electric Locomotives Southern California:

Battery-electric locomotives, can play an important role in short-haul freight rail service, and commuter passenger service. The faster acceleration and zero-emissions track miles enabled by electric locomotives will greatly enhance the environmental and de-congestion benefits of both services. As battery switcher locomotive technology is further developed in the next several years, operational enhancements will be provided by advanced charging stations.

RPS's proposed plan to advance of Southern California freight rail battery electrification will begin with a pilot project of battery-electric switchers in freight rail yards. This will be followed by a pilot project of 'Range Extended' battery-electric switchers at the San Pedro Bay ports, up the Alameda Corridor, and in railyards across the region.

Rail Propulsion Systems comments on Connect SoCal 2020 RTP/SCS

There needs to be more federal, state and locally-funded programs that could support zero-emission locomotive research and development (R&D) projects and technology demonstration projects. There are plenty of incentives and R&D programs, at both the state and federal levels, supporting electric cars and trucks. By contrast, public R&D funding opportunities for electric rail technologies are few and far between. Southern California should be a leader in zero-emissions, electric rail technology, and SCAG could be a major advocate for this technology.

Thank you for your consideration.

Sincerely,

Rail Propulsion Systems LLC

[Redacted signature block]



January 23, 2020

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Responsible Land Use is now a part of this growing coalition in 2020.

Responsible Land Use works in Los Angeles, San Bernardino, and Orange counties. Our mission is to preserve our remaining natural open spaces by careful, considered planning. We offer the following comments on the Natural and Farmland policy, goals, and next steps.

Our organization supports the idea that as new growth occurs it should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what conservation mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved by focusing development elsewhere, doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus our work on protecting important habitat lands. A lot of time, energy, money, strategy, and political will are combined to create a successful conservation transaction that lead to permanently conserved lands. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.

We therefore appreciate the land use priority on page 42 which encourages "growth in walkable/mixed-use communities with ready access to transit infrastructure and employment opportunities." This is a laudable goal which we whole heartedly support. However, given the level of traffic congestion in our region, we believe the SCAG plan should also support every possible way of getting people out of their cars. One way to do this is to take advantage of other types of mixed-use opportunities.

Diamond Bar, where we live, is an interesting case in point. Diamond Bar is essentially built out. Our steep hillside terrain barely accommodates the traffic needs of the nearly sixty thousand people who live here. Our traffic congestion challenges are complicated even more with horrendous cut through traffic caused by the bottlenecked 57/60 interchange, the 5th worst congested intersection in the entire country, which runs along portions of our northern border.

We also have a Metrolink transit station along our northern border with City of Industry. An area which SCAG has marked as a “Priority Growth Area” in Exhibit 3.4, and a “Transit Priority Area in Exhibit 3.7. In its recently completed general plan update, Diamond Bar wisely designated this area as a high-density, mixed-use area.

However, in the coming years, Diamond Bar’s updated general plan anticipates needing approximately 3,000 additional housing units, a number which will require more than our newly designated transit area will be able to accommodate. If Diamond Bar is going to add additional housing with minimal impact on our already intolerable congestion levels, Responsible Land Use believes that the next best plan for adding additional housing units would be to upgrade our car-centric retail centers into pedestrian-friendly, mixed-use areas, and place our additional housing units there. For Diamond Bar, and many other nearly built out cities in southern California, this will be one of the only ways of both adding housing units that minimally impact the congestion on our already overcrowded streets, and also preserve what’s left of our precious open spaces.

While we believe that properly designed mixed-use areas near transit stops can be beneficial additions to our communities, care must be taken to avoid shortcuts in planning for these areas. The newly resurrected SB50, for example, essentially supports placing high-density housing all by itself near transit stops. Allowing this will create more problems than it solves.

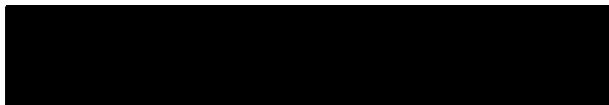
U.S. Department of transportation research shows that work commutes constitute a minority of vehicle trips. The majority of vehicle trips are for shopping and other errands. Those who can afford the prices for high density developments near transit stops, are also typically able to afford cars. The net result of this is if high-housing, all by itself, is allowed near transit stops, it typically ends up creating more car-centric households, which make our traffic congestion challenges in those areas even worse. We therefore urge SCAG to only advocate for carefully planned mix-use development.

Additionally, as we move into the future, we will need many different options for protecting our open remaining natural open spaces, creating additional housing units while at the same time minimizing impacts on our traffic congestion. All possible avenues for achieving these imperatives, such as the one suggested above, should be identified and explored.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I can be reached at [REDACTED]. In addition, we request to be included on any notifications (electronic or otherwise) about this policy’s creation and implementation, please send information to [REDACTED].

Sincerely,

R. Lee Paulson
President
Responsible Land Use



January 24, 2020




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

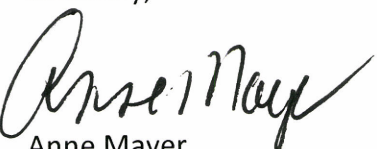
Subject: Comments on the Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

Dear Mr. Ajise 

Thank you for the opportunity to comment on this Southern California Association of Governments' (SCAG) draft 2020 RTP/SCS. This monumental effort is appreciated and reflects various issues and challenges associated with a highly populated and diverse region that relies on an integrated transportation system encompassing all modes for the movement of people and goods. We commend SCAG staff for establishing the various working groups in addition to working with cities, counties, transit operators, county transportation commissions, and community groups to develop a plan that addresses the various aspects of transportation and its impact on the environment, quality of life, public health, and environmental justice.

The effort SCAG undertook in developing the regional demographic forecast to reflect general plans and local input allows the jurisdictions and agencies to uphold established goals and policies at the local level and maintain consistency with regional goals and policies. We are pleased with the focus on jobs/housing balance to reduce commute times and distance within the SCAG region, the support for legislation that reduces barriers to new construction, and the unwavering commitment towards safety and mobility for all users of the region's transportation network.

Enclosed is a list of comments that include clarifications, corrections, and minor edits. Please contact   Multimodal Services Director at  if you have any questions on our comments.

Sincerely,

Anne Mayer
Executive Director

Enclosure: List of Comments

Chapter 3 – A Path to Greater Access, Mobility, and Sustainability

- Table 3.1 – Revise Coachella Valley BRT to Coachella Valley Quick Bus.
- Exhibit 3.1 – Remove the Coachella Valley BRT line from the map.
- Pg. 65 – Revise “San Jacinto” to “San Jacinto/Hemet” for Riverside County Metrolink extension.
- Table 3.2 – Remove “Also add one southbound auxiliary lane from Cajalco Rd to Weirick Rd.”
- Exhibit 3.3 – Incorporate RCTC’s I-15 Southern Extension as “planned dual-lane segment” in the map.

Highway and Arterials Appendix

- Exhibit 1 and 5 – Incorporate RCTC’s I-15 Southern Extension as “planned dual-lane segment” in the map.
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Goods Movement Appendix

- Pg. 54 – Revise “Los Angeles” to “Riverside” for I-215 truck bottleneck.

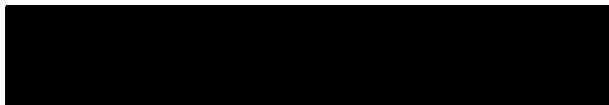
Transit Appendix

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- Table 9 – Revise “2019 Draft/In Process Long Range Transportation Plan” to “2019 Long Range Transportation Study” for RCTC under the Long Range Plan column. RCTC’s Long Range Transportation Study was completed in December 2019.
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Rail Appendix

- Pg. 7 – Confirm statements regarding thruway trips in the Pacific Surfliner paragraphs. Due to recent legislation, thruway trips no longer need to be connected to a train trip.
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- Pg. 10, second column, third paragraph down – Highlight success of the Perris Valley Line extension by adding: “The Perris Valley Line was added in the summer of 2016 with 24 miles of new track and 4 additional stations.”
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- Pg. 24 – Revise the name of the station from “Hunter Park” to “Hunter Park/UCR” under the Metrolink Perris Valley Line.
- Pg. 26 – Revise language on the Coachella Valley Rail Service paragraph to reflect the following; suggested revisions are italicized: “RCTC is currently conducting a Program Environmental Impact Statement/Program Environmental Impact Report (PEIS/EIR) *and Service Development Plan* for the future Coachella Valley rail service between downtown Los Angeles and Indio via Fullerton. The *planning exercise* will conceptualize how the service would operate and what infrastructure improvements would be needed to accommodate the new intercity passenger rail service.”
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January 24, 2020




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

Subject: Comments on the Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

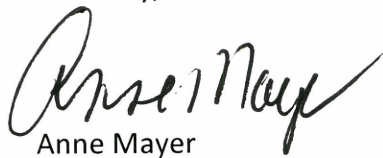
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Agustin Barajas

From: Martha Masters [REDACTED]
Sent: Thursday, January 30, 2020 1:40 PM
To: Agustin Barajas
Cc: Moe-Luna, Lorelle; Jillian Guizado; Jenny Chan
Subject: 2020 RTP/SCS - Public Comments for Project Listing - RCTC

Hi Agustin,

I would formally like to submit this comment to include the information below in the 2020 RTP.

Thank you,

Financially Constrained	Lead Agency	Cost
Railroad Crossing Safety Improvements - Comprehensive countywide approach to improve street grade crossings	Riverside Transportation Commission	\$30,000
Metrolink low/zero emission technology trains	Riverside Transportation Commission	\$100,000

Strategic Listed Projects		
2nd main track from Moreno Valley to Perris	Riverside Transportation Commission	
3rd main track from Highgrove to Colton	Riverside Transportation Commission	
3rd main track from Riverside to Fullerton	Riverside Transportation Commission	
4th main track and main station improvements from West Corona to Corona-La Sierra	Riverside Transportation Commission	

Martha Masters
RCTC



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Tel: (213) 236-1800

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ORANGE COUNTY

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Tel: (714) 542-3687

RIVERSIDE COUNTY

3403 10th St., Ste. 805
Riverside, CA 92501
Tel: (951) 784-1513

SAN BERNARDINO COUNTY

Santa Fe Depot
1170 West 3rd St., Ste. 140
San Bernardino, CA 92410
Tel: (909) 806-3556

VENTURA COUNTY

4001 Mission Oaks Blvd., Ste. L
Camarillo, CA 92418
Tel: (805) 642-2800



PUBLIC PARTICIPATION AND CONSULTATION

APPENDIX 3C COMMENT LETTERS D - R

connectsocial.org