

Connect SoCal

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



CHAPTER 8 RESPONSE TO COMMENTS Final Program Environmental Impact Report

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CHAPTER 8

Response to Comments

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8.1 INTRODUCTION

8.1.1 OVERVIEW OF FINAL PEIR

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132, the Final PEIR consists of the following:

- (a) The Draft PEIR or a revision of the draft;
- (b) Comments and recommendations received on the Draft PEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft PEIR;
- (d) SCAG's responses to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by SCAG (including minor changes to the PEIR).

This Chapter 8 has been prepared by the Southern California Association of Governments (SCAG) in accordance with CEQA. It includes an overview of the CEQA process for the Draft Program Environmental Impact Report (PEIR) for Connect SoCal 2024, also known as the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy ("Plan" or "Project"), a list of commenting agencies, organizations, and individuals (CEQA Guidelines Section 15132(c)), and SCAG's responses to all comments raising significant environmental issues on the 2024 Draft PEIR (CEQA Guidelines Section 15132(d)).

Where responses result in a change to the Draft PEIR text, table, or map, the response indicates that a change is made and where the change is made in the Final PEIR. Chapter 9 shows the revisions. Additions to text are shown in underline and deletions of text are shown in ~~striketrough~~. Chapter 8 along with all comment letters and Chapter 9 together with the Draft PEIR and its technical appendices constitutes the Connect SoCal 2024 Final PEIR and are available at SCAG's website <https://scag.ca.gov/peir>.

8.1.2 CEQA PROCESS OF THE 2024 DRAFT PEIR

The Connect SoCal 2024 Draft PEIR was released for a 65-day public review and comment period that started on Thursday, November 9, 2023, and ended at 5 p.m. (Pacific Standard Time) on Friday, January 12, 2024. The 2024 Draft PEIR document, including technical appendices, and a public CEQA Notice of Availability (NOA) in English, Spanish, Chinese, Korean, and Vietnamese on, were published on SCAG's website at <https://scag.ca.gov/peir>.

The CEQA NOA for the 2024 Draft PEIR, which included a link to the 2024 Draft PEIR document, was uploaded to and filed with the Governor's Office of Planning and Research (OPR) CEQA submit Database on November 9, 2023 (State Clearinghouse [SCH]# 2022100337) and posted on State Clearinghouse's CEQAnet Web Portal at <https://ceqanet.opr.ca.gov/2022100337>. In addition, the NOA was posted with each of the County Clerks for the six counties in the SCAG region.

The NOA and the 2024 Draft PEIR were distributed primarily using electronic mail to more than 7,900 interested parties including representatives of Native American tribes, federal, state, regional and local government agencies, and other interested agencies, organizations, and individuals. A summary of the NOA was translated to English, Spanish, Korean, Chinese, and Vietnamese languages and published on SCAG's website as well as in 13 newspapers, including the Los Angeles Times, and additional newspapers that address the large geographic reach and diverse population within the SCAG region. Hard copies of the NOA were also mailed directly to approximately

171 interested parties, including federal, state, regional and local agencies, organizations using the U.S. Postal Service certified mail service and first-class mail, as appropriate, and additional hard copies of the NOA (separate versions in five languages) were sent via certified mail to 68 major libraries in the region. Hard copies of the NOA and 2024 Draft PEIR were also available at the following SCAG Regional Office locations:

SCAG Main Office

900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

SCAG Riverside County Regional Office

3403 10th Street, Suite 805
Riverside, CA 92501

SCAG Imperial County Regional Office

1503 N. Imperial Avenue, Suite 104
El Centro, CA 92243

SCAG San Bernardino County Regional Office

1170 West 3rd Street, Suite 140
San Bernardino, CA 92410

SCAG Orange County Regional Office

600 South Main Street, Suite 741
Orange, CA 92868

SCAG Ventura County Regional Office

4001 Mission Oaks Boulevard, Suite L
Camarillo, CA 93012

The 65-day CEQA public review and comment period for the 2024 Draft PEIR closed at 5:00 PM (PST) on January 12, 2024, fulfilling and exceeding all CEQA noticing and public review requirements for a Draft EIR (CEQA Guidelines Sections 15087, 15105, and 15205).

8.1.3 FINAL PEIR CERTIFICATION AND PROJECT APPROVAL

Prior to approving the Project (Connect SoCal 2024), SCAG, as the Lead Agency, shall certify that the Final PEIR:

- (a) Has been completed in compliance with CEQA;
- (b) Has been presented to the SCAG Regional Council as the decision-making body for the Lead Agency, which reviewed and considered it prior to approving the Project; and
- (c) Reflects SCAG’s independent judgment and analysis (CEQA Guidelines Section 15090)

After the Final PEIR is certified, the SCAG Regional Council may proceed to consider Project approval (CEQA Guidelines Section 15090). Prior to approving the Project, SCAG must make written findings, adopt a statement of overriding considerations for each unmitigated significant environmental effect identified in the Final PEIR, and adopt a program for monitoring and/or reporting on any project revisions and mitigation measures in accordance with CEQA Guidelines Sections 15091, 15093, and 15097.

The Connect SoCal 2024 proposed Final PEIR was published on March 25, 2024, and considered for certification by SCAG’s Regional Council on April 4, 2024. As previously mentioned, a Mitigation Monitoring and Reporting Program, the Findings of Facts, and a Statement of Overriding Considerations are also required and are presented as separate documents (Exhibits A, B, and C) to the Resolution that is adopted by SCAG’s Regional Council upon certification of the Final PEIR.

Upon Final PEIR certification and subsequent Plan approval, SCAG staff must file a Notice of Determination (NOD) with the Office of Planning and Research (OPR) and the County Clerks of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, pursuant to CEQA Guidelines Section 15094.

8.2 COMMENTS ON THE 2024 DRAFT PEIR AND LIST OF COMMENTERS

The public comment and response component of the CEQA process serves an essential role. It allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft PEIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft PEIR; (3) the ability to check for accuracy of the analysis contained within the Draft PEIR; (4) the ability to share expertise; and (5) the ability to discover public concerns. It also provides an opportunity to amplify and better explain the analyses that lead agencies have undertaken to determine the potential environmental impacts of a project. To that extent, responses to comments are intended to provide complete and thorough explanations to commenting agencies and individuals, and to improve the overall understanding of a project for the decision-making bodies.

CEQA Guidelines Section 15088 requires SCAG to evaluate comments on significant environmental issues received from parties that have reviewed the Draft PEIR and to prepare a written response. As stated in CEQA Guidelines Sections 15132 and 15362, the Final PEIR must contain the comments received on the Draft PEIR, either verbatim or in summary, a list of persons commenting, and the response of the Lead Agency to the comments received.

A total of 33 comment letters were received on the 2024 Draft PEIR, including two comment letters received after the close of the 65-day public comment period. Under CEQA, a lead agency is required to consider comments on the Draft PEIR and to prepare written responses if a comment is received within the public comment period (Public Resources Code Section 21091(d), CEQA Guidelines Section 15088). Nonetheless, for information purposes, SCAG has elected to respond to late letters. Comment letters on the 2024 Draft PEIR are divided into the following nine categories:

1. Sovereign Nations
2. Federal Agencies
3. State Agencies
4. Regional Agencies
5. Subregional Agencies
6. County Transportation Commissions
7. Local Jurisdictions (including SCAG member agencies)
8. Organizations
9. Individuals

Within each category, comment letters are presented in alphabetical order. Letters received after the close of the 65-day public comment period are marked as “late” and presented at the end of their respective categories.

Table 8-1, 2024 PEIR Commenter Matrix, provides a list of the commenters in response to the 2024 Draft PEIR and the page number where responses begin for each comment letter. Plan Submission ID(s) are also included for comment letters that included comments on both Plan and PEIR documents.

TABLE 8-1 2024 PEIR Commenter Matrix

| PEIR LETTER ID. | COMMENTER | LOCATION OF PEIR RESPONSES (BY PAGE NUMBER) | LOCATION OF PLAN RESPONSES (BY SUBMISSION ID)* |
|---|--|---|--|
| Sovereign Nations | | | |
| SOV 1 | Agua Caliente Band of Cahuilla Indians | Page 8-23 | — |
| Federal Agencies | | | |
| FED 1 | Department of the Navy (Late) | Page 8-24 | 0001818 |
| State Agencies | | | |
| STA 1 | California Department of Transportation, Aeronautics Program | Page 8-27 | — |
| STA 2 | California Department of Transportation | Page 8-29 | 0001764, 0001765 |
| STA 3 | California Highway Patrol | Page 8-31 | — |
| Regional Agencies | | | |
| REG 1 | Imperial Irrigation District | Page 8-32 | — |
| REG 2 | Transportation Corridor Agencies | Page 8-35 | 0001751 |
| Subregional Agencies | | | |
| SUB 1 | Orange County Council of Governments | Page 8-36 | 0001766, 0001778 |
| County Transportation Commission | | | |
| TRANS 1 | Orange County Transportation Authority | Page 8-60 | 0001733 |
| TRANS 2 | San Bernardino County Transportation Authority & San Bernardino Council of Governments | Page 8-61 | 0001773 |
| Local Agencies (including SCAG Member Jurisdictions) | | | |
| LOC 1 | City of El Segundo | Page 8-62 | — |
| LOC 2 | City of Garden Grove | Page 8-65 | — |
| LOC 3 | City of Huntington Beach | Page 8-67 | 0001761 |
| LOC 4 | City of Irvine | Page 8-69 | 0001721 |
| LOC 5 | City of Riverside | Page 8-87 | — |
| LOC 6 | City of Whittier | Page 8-90 | 0001820 |
| Organizations | | | |
| ORG 1 | Citizens Coalition for Safe Community and Sierra Club Transportation | Page 8-91 | 0001700 |
| ORG 2 | Center for Demographic Research | Page 8-92 | 0001706 |
| ORG 3 | Center for Demographic Research | Page 8-93 | — |
| ORG 4 | Friends of Harbors, Beaches and Parks | Page 8-94 | 0001685, 0001686, 0001687 |
| ORG 5 | Friends of Harbors, Beaches and Parks | Page 8-96 | — |
| ORG 6 | Friends of Harbors, Beaches and Parks | Page 8-104 | 0001688 |
| ORG 7 | Hills for Everyone | Page 8-105 | 0001763 |
| ORG 8 | Natural Lands Coalition | Page 8-106 | 0001753, 0001755 |
| ORG 9 | Rail Passengers Association of California | Page 8-108 | 0001697 |
| ORG 10 | Robert Redford Conservancy for Southern California Sustainability | Page 8-109 | 0001757 |

| PEIR LETTER ID. | COMMENTER | LOCATION OF PEIR RESPONSES (BY PAGE NUMBER) | LOCATION OF PLAN RESPONSES (BY SUBMISSION ID)* |
|--------------------|--|---|--|
| ORG 11 | Riverside Neighbors Opposing Warehouses | Page 8-111 | 0001676 |
| ORG 12 | Riverside Neighbors Opposing Warehouses | Page 8-112 | 0001829 |
| ORG 13 | Riverside Neighbors Opposing Warehouses | Page 8-114 | 0001822, 0001823 |
| ORG 14 | Southern California Business Coalition | Page 8-136 | 0001756 |
| ORG 15 | World Be Well Organization | Page 8-137 | 0001775 |
| ORG 16 | Riverside Neighbors Opposing Warehouses (Late) | Page 8-138 | 0001822 |
| Individuals | | | |
| IND 1 | George Hague | Page 8-139 | 0001752 |

Note: * Plan Submission ID(s) were included only for letters that included comments on both Plan and PEIR documents. Plan related responses can be found by searching for their Submission ID number within the Plan's Public Participation and Consultation Technical Report.

8.3 RESPONSES TO COMMENTS

In accordance with CEQA Guidelines Section 15088, SCAG staff evaluated the 33 comment letters received from agencies and other interested parties and has prepared written responses to each comment pertinent to the adequacy of the environmental analyses contained in the 2024 Draft PEIR. In accordance with CEQA Guidelines Section 15088(a), SCAG is required to respond to only those comments on significant environmental issues. Among the 33 comment letters on the 2024 Draft PEIR, there were approximately 700 unique comments directly related to environmental issues. In accordance with CEQA Guidelines Section 15088(b), the written responses have been prepared and included below to address the environmental issues raised. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the PEIR is provided. In each case, SCAG expended a good faith effort, supported by reasoned analysis, to respond to comments.

In the course of responding to comments, certain portions of the 2024 Draft PEIR have been modified slightly for further clarification. SCAG staff has evaluated the comments, responses to comments, and modifications and determined that none of the materials constitutes the type of significant new information that requires recirculation of the 2024 Draft PEIR for further public review and comment under CEQA Guidelines Section 15088.5. None of the materials has identified the existence of (1) a significant new environmental impact that would result from the Project or an adopted mitigation measure; (2) a substantial increase in the severity of an environmental impact; (3) a feasible project alternative or mitigation measure not adopted that is considerably different from others analyzed in the 2024 Draft PEIR that would clearly lessen the significant environmental impacts of the Project; or (4) information that indicates the public was deprived of a meaningful opportunity to review and comment on the Draft PEIR (CEQA Guidelines Section 15088.5(a)). Consequently, SCAG finds the clarifications made to the 2024 Draft EIR in the Final PEIR do not collectively or individually constitute significant new information within the meaning of Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5. Recirculation of the 2024 Draft PEIR or any portion thereof, is, therefore, not required.

Pursuant to CEQA, the written responses to commenting public agencies must be provided at least 10 days prior to the certification of the Final PEIR (CEQA Guidelines Section 15088(b)). SCAG published the proposed Final PEIR on **March 25, 2024**, including responses to all comments (not limited to agencies comments) and associated revisions on SCAG's website at <https://scag.ca.gov/peir>.

The responses to comment letters are provided in the front portion of this document with original bracketed comment letters following at the end. For the purposes of identifying and responding to comments on the 2024 Draft PEIR, individual letters are numbered as shown in Table 8-1 (top of the first page of each letter), and the individual comments within each letter are assigned a bracketed comment number. For example, the first comment in the comment letter from the Department of the Navy is labeled **FED 1-1**. Comment letters received after 5 p.m. (Pacific Standard Time) on Friday January 12, 2024, are identified as "Late."

As previously mentioned, where responses result in a revision to the PEIR text, table or graphic, the response indicates that a revision is made and where the revision is made, and the resulting revision is identified in Chapter 9, *Clarifications and Revisions*. Chapter 9 shows additions to text in underline and deletions in ~~strikethrough~~ format. Where a new graphic or table is entirely new the information is not underlined as new, but rather the Final PEIR indicates that the table information is being replaced.

Several commenters on the Connect SoCal 2024 PEIR indicated in the subject line of their letter that they were providing comments on the 2024 Draft PEIR but the substance of their letter included comments on both the 2024

Draft PEIR and Connect SoCal 2024 or comments only on Connect SoCal 2024. Pursuant to CEQA Guidelines Section 15088(a), SCAG is required to evaluate and address only those comments on environmental issues received from public agencies and other interested parties who reviewed the 2024 Draft PEIR.

SCAG recognizes the importance of public participation, and as such, Plan-specific comments were re-routed to SCAG's online comment response form system, which documents and tracks all Plan related comments. Each comment related to the Plan was given a Submission ID number (e.g., Submission ID 0001818) which was logged and responded to as part of the final Plan. Table 8-1, above, identifies the Plan Submission ID(s) for letters that included comments on both Plan and PEIR documents. Commenters who are reviewing the responses to PEIR comments can look up the Plan related responses by searching for their Submission ID number within the **Public Participation and Consultation Technical Report**, which is a sub-appendix of the Final Connect SoCal 2024. All responses to comments and revisions to Connect SoCal 2024 are available at www.scag.ca.gov/connect-socal.

8.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of the 2024 Draft PEIR should be "on the proposed finding that the project will not have a significant effect on the environment." If persons and public agencies believe that the project may have a significant effect, they should (1) identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant. Comments are most helpful when they are as specific as possible. At the same time, reviewers should be aware that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or requested by commenters.

CEQA Guidelines Section 15204I further advises that "[r]eviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence." CEQA Guidelines Section 15204(e) also states that "[t]his section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

Written responses to individual comments are prepared consistent with CEQA Guidelines Section 15088 and are included in Section 8.6 below. The level of detail contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general).

8.5 MASTER RESPONSES

To address recurring themes observed among the Draft PEIR comments, a set of six "Master Responses" were developed. The Master Responses address multiple similar or related comments or themes and provide a comprehensive reply. The responses to individual comments may cite pertinent Master Response(s), where appropriate, and additional information is provided for comments not fully addressed through a Master Response(s). Master Responses were prepared for the following topics:

1. Comments related to Connect SoCal 2024
2. General Comments and Non-CEQA Issues

3. Level of Detail in a Program EIR versus Project EIR
4. Regional Development Pattern and Growth Forecast
5. Mitigation Measures
6. Alternatives

8.5.1 MASTER RESPONSE NO. 1: COMMENTS RELATED TO CONNECT SOCAL 2024 (“2024 RTP/SCS” OR “PLAN”)

The 2024 Draft PEIR was circulated for a 65-day CEQA public review period, from November 9, 2023, to January 12, 2024, concurrent with the 72-day public review and comment period for the Draft Plan, from November 2, 2023, to January 12, 2024. SCAG received 33 comment letters on the Draft PEIR during the CEQA comment period, including two comment letters received after the close of the comment period. Several of the comment letters indicated in the subject line that they were providing comments on the Draft PEIR but the substance of their letter included comments on both the Draft PEIR and the Plan or comments only on the Plan.

This 2024 PEIR is not intended or required to provide justification for Connect SoCal 2024. Rather, this 2024 PEIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Plan is likely to have on the environment. This 2024 PEIR also identifies ways in which the significant effects of the Plan might be reduced or minimized and identifies alternatives to the Plan. The 2024 PEIR is not a vehicle for making changes to the Plan, but it includes mitigation measures that reduce or eliminate the identified significant adverse environmental impacts. Requests for changes to the Plan are addressed through the Plan’s public comment process.

Pursuant to CEQA Guidelines Section 15088(a), SCAG is required to evaluate only those comments on environmental issues from persons who reviewed the 2024 Draft PEIR and respond in good faith to comments raising “significant environmental issues.” (City of Irvine v County of Orange (2015) 238 Cal. App. 4th 526, 549). As such, the 2024 PEIR provides responses to comments directly related to the environmental analysis that is the subject of the 2024 PEIR.

SCAG recognizes the importance of public participation and as such, Plan-specific comments were re-routed to SCAG’s online form system which documents and tracks all Plan related comments by sub-category (Aviation and Airport Ground Access, Goods Movement, Transportation Conformity Analysis, etc.). Each comment related to the Plan was given a Submission ID number (e.g., Submission ID 0001549) which was logged appropriately for Planning staff to review and respond to as part of the Final Plan. Table 8-1, above, identifies the Plan Submission ID(s) for letters that included comments on both Plan and PEIR documents. Commenters who are reviewing the responses to PEIR comments can look up the Plan related responses by searching for their Submission ID number within the **Public Participation and Consultation Technical Report**, which is a sub-appendix of the Final Connect SoCal 2024. All responses to comments and revisions to Connect SoCal 2024 are available at <https://scag.ca.gov/connect-socal>.

8.5.2 MASTER RESPONSE NO. 2: GENERAL COMMENTS AND NON-CEQA ISSUES

PURPOSE OF AN EIR AND REQUIREMENTS FOR RESPONSE TO COMMENTS

CEQA's statutory framework sets forth a series of analytical steps intended to promote the fundamental goals and purposes of environmental review—information, participation, mitigation, and accountability. The purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect that a project is likely to have on the physical environment, to list ways in which any significant adverse effects might be minimized, and to indicate alternatives that reduce any identified adverse impacts (Public Resources Code Section 21061). Thus, the purpose of this 2024 PEIR is to evaluate potential impacts on the environment resulting from the Plan and to identify mitigation measures and alternatives that would avoid or substantially lessen significant adverse environmental impacts while attaining most of the objectives of the Plan.

Pursuant to the California Public Resources Code Section 21091(d), SCAG considered all comments received on the 2024 Draft PEIR, and this document provides written response describing the “disposition of each significant environmental issue that is raised by commenters.” CEQA Guidelines Section 15088 provides further guidance on the preparation of response to comments and indicates that while lead agencies must evaluate all comments received on a Draft PEIR, they need only respond to comments related to significant environmental issues associated with a project. CEQA Guidelines Section 15204 further provides that lead agencies in responding to comments do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR. CEQA Guidelines Section 15204 recommends that commenters focus on the sufficiency of the EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Section 15204 further indicates that commenters should provide an explanation and evidence supporting their comments. An effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion (CEQA Guidelines Section 15064).¹ CEQA case law has held that lead agencies are not obligated to undertake every suggestion given to them and are also not required to conduct every test or perform all research, study, and experimentation recommended by commenters. Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency based on substantial evidence in the record.

NON-CEQA ISSUES

A few comments suggested that the 2024 PEIR should address topics that are outside the purview of CEQA. As discussed further below under Adequacy of Analysis, CEQA requires the evaluation of potential physical environmental impacts of the project on the environment. Several comments raise issues that are socio-economic in nature and thus not appropriately addressed within a CEQA document. An EIR's required focus is on physical impacts to the environment. Environmental justice (EJ) issues are one facet of socio-economic impacts of particular concern that is not addressed as part of CEQA analyses (unlike the federal process where EJ is an issue addressed by the National Environmental Policy Act [NEPA]). As noted in Section 3.11, *Land Use and Planning*, of the Draft 2024 PEIR, Senate Bill (SB) 1000 was passed into law in 2016, requiring local governments to identify EJ communities (called “disadvantaged communities”) in their jurisdictions and address EJ in their general plans. This law requires the inclusion of an EJ element when a lead agency is updating two or more General Plan elements and as part of evaluation of such elements CEQA documents may address EJ issues. However, the CEQA Guidelines

¹ Substantial evidence means “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” [CEQA Guidelines Section 15384; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108–1109.]

do not include EJ as a resource topic or threshold. The environmental analysis in this PEIR mirrors CEQA Guidelines Appendix G and therefore does not include a designated EJ section or significance threshold. However, a robust EJ and equity analysis was included as part of Connect SoCal 2024. Refer to page 83 in Chapter 3, *The Plan*, pages 188 through 197 in Chapter 5, *Measuring Our Progress*, as well as in the Connect SoCal 2024 Equity Analysis Technical Report. In addition, the 2024 PEIR integrates and cross-references relevant information from the Connect SoCal 2024 Environmental Justice analysis throughout the various PEIR sections, where applicable and appropriate. For example, EJ issues are addressed in the Air Quality analysis of cancer risk (Section 3.3, *Air Quality*, of the 2024 PEIR, under Impact AQ-3) that discusses communities identified through the AB 617 program (Priority Equity Communities). AB 617 seeks to improve air quality, reduce PM2.5 emissions, and lower potential health risks in these impacted communities. Several transportation segments evaluated in the HRA travel through AB 617 communities. The HRA demonstrates substantial reductions in DPM and associated health risks in future years as compared to existing conditions.

ADEQUACY OF ANALYSIS

The focus of SCAG's responses to comments received on the Draft 2024 PEIR is the "disposition of significant environmental issues raised" in the comments (CEQA Guidelines Section 15088(c)). Detailed responses are not necessarily provided for comments that do not relate either to significant environmental issues or adequacy of the analysis in the 2024 PEIR. This includes comments that raise issues that are not environmental impacts as identified by CEQA (e.g., socioeconomic concerns), or relate to unsupported opinions regarding the adequacy of the 2024 PEIR analysis and/or the 2024 PEIR's findings of significance.

As noted above in the discussion of Non-CEQA Issues, CEQA is focused on the analysis of impacts of the project on the physical environment and not impacts of the environment on the project.² So, for example, geotechnical issues are only of concern with respect to an analysis under CEQA, if a project could exacerbate existing conditions. That is not to say that geotechnical concerns are not concerns to be addressed in the planning and permitting processes. The Connect SoCal 2024 PEIR evaluates these existing conditions in relation to the Plan in order to determine if the Plan has the potential to cause impacts that exacerbate existing conditions.

The analysis in the Connect SoCal 2024 PEIR is based on scientific and factual data which has been reviewed by the lead agency and reflects its independent judgement and conclusions. CEQA permits disagreements between experts with respect to environmental issues addressed in an EIR. As stated in CEQA Guidelines Section 15151, disagreement among experts does not make an EIR inadequate. The courts have looked not for perfection but for adequacy, completeness and a good faith effort at full disclosure.

OPINIONS AND GENERAL SUPPORT FOR, OR OPPOSITION TO, THE PROJECT OR PEIR

A number of comments raise issues that are not within the purview of CEQA, such as suggestions for changes to the Plan unrelated to potential significant adverse environmental impacts. The commenters often raise issues that are important to the decision-making process but are not properly addressed as part of the CEQA process. In addition, several commenters provide their opinion(s) that impacts be considered significant or that the significance conclusions in the 2024 PEIR be revised but do not provide substantial evidence in support of their opinions. Commenters also express their opinions in support or opposition to the Plan, or outline concerns

² See California Supreme Court's decision in *California Building Industry Association v Bay Area Air Quality Management District*, (S213478, December 17, 2015) and California Court of Appeals decision in *California Building Industry Association v Bay Area Air Quality Management District*, (August 12, 2016).

associated with specific features or provisions of the Plan that do not relate either to significant environmental issues or adequacy of the environmental analysis in the 2024 PEIR.

While SCAG welcomes all comments, opinions and expressions of opposition or support unrelated to physical environmental impacts, these comments are appropriately addressed outside the CEQA process. The purpose of the 2024 PEIR is to present objective information as to the Plan's potential physical environmental impacts. Moreover, the purpose of allowing the public and agencies to comment on a Draft 2024 PEIR is to allow any errors to be identified and corrected. Opinions concerning issues not addressed by CEQA, unsupported opinions regarding environmental issues already addressed in an EIR, as well as expressions of opposition or support for a project, are made a part of the administrative record and are forwarded to the decision-makers for their consideration in taking action on the project, but they may not be specifically responded to in the Final PEIR.

8.5.3 MASTER RESPONSE NO. 3: LEVEL OF DETAIL IN A PROGRAM EIR VERSUS PROJECT EIR

Several comments requested additional analysis in the PEIR for specific projects, intersections, or other local conditions.

As explained in Chapter 1, *Introduction*, of the 2024 PEIR, this PEIR is a programmatic document that provides a first-tier, region-wide environmental assessment of the potential significant environmental effects of implementing policies, strategies, projects, and programs included in Connect SoCal 2024 over a minimum 20-year horizon period. CEQA allows that a Program EIR, "may be prepared on a series of actions that can be characterized as one large project and are related either (1) geographically, (2) as logical parts of the chain of contemplated actions, (3) in connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways" (CEQA Guidelines Section 15168). The PEIR for the Connect SoCal 2024 offers regional scale analysis of the impacts of the Plan and provides mitigation measures to be implemented by SCAG at the regional level, and proposed mitigation measures for consideration as appropriate and feasible by lead agencies in subsequent, site-specific environmental review, including project-level EIRs and/or Environmental Impact Statements (EISs) for individual projects or plans.

The focus of the environmental analysis in this PEIR is on potential regional-scale impacts associated with implementation of the Plan as a whole. While Connect SoCal 2024 includes individual transportation projects and programs, the focus is region-wide. As such, the Plan and PEIR do not include site-specific analysis of any project contained in Connect SoCal 2024. Many of the individual transportation projects included in the Plan are identified at an early stage of the development phase, and detailed project/site specific analysis is not possible or appropriate at this time without undue speculation (refer to CEQA Guidelines Section 15126.6(f)(3)).

Furthermore, while the Plan identifies several significant impacts at the regional level, these impacts must be separately assessed at the project level to determine whether specific project conditions may result in significant impacts at the local or sub-regional level requiring project-level mitigation measures and alternatives.

Use of a programmatic approach ensures consideration of the cumulative effects of the transportation projects contemplated over the 20 plus year planning horizon period and avoids duplicative reconsideration of the basic policy consideration in the Plan related to land use patterns, alternative modes of travel, active transportation, and sustainability. As specified by CEQA Guidelines Section 15168(c), subsequent activities analyzed in the PEIR must

be examined to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the PEIR, a new initial study would need to be prepared leading to determine the appropriate level of environmental compliance documentation pursuant to CEQA (refer to CEQA Guidelines Section 15002(k)).

8.5.4 MASTER RESPONSE NO. 4: REGIONAL DEVELOPMENT PATTERN AND GROWTH FORECAST

A number of comments addressed the land use development pattern and/or growth forecast identified in the Plan and evaluated in the 2024 PEIR.

As explained in Section 3.0 *Introduction to the Analysis*, Subsection 3.0.1, *Environmental Impact Analysis*, Connect SoCal 2024 identifies and the PEIR evaluates a forecasted regional development pattern that encourages growth in Priority Development Areas (PDAs), and discourages growth in Green Region Resource Areas (GRRAs). This forecast was reviewed and is based on local input provided by CTCs and local jurisdictions.

As discussed in Chapter 2, *Project Description*, Subsection 2.5.2, *Regional Growth Forecast and Forecast Regional Development Pattern*, in preparing/updating the SCS each cycle SCAG prepares a preliminary regional growth forecast (see details in footnote 2), then reaches out to each local jurisdiction to obtain input at the Traffic Analysis Zone (TAZ) level to future anticipated total household and total employment growth.³ As a regional agency, SCAG does not have the depth of knowledge necessary to undertake local planning, and therefore, this input is essential. However, SCAG also understands that local jurisdictions' project-oriented growth outlooks are not entirely able to predict broader demographic and market demand-based economic forces undergirding regional growth in the long-run, and as such, SCAG's expert and data-derived county and regional projections must be periodically used as a basis for collaboratively updating jurisdiction and TAZ-level growth projections. The Plan is updated every four years and therefore, as planning-level assumptions and forecasts change, the Plan and associated analyses are updated accordingly.

The Demographics & Growth Forecast Technical Report provides details of the expert projections and data used for the Plan growth forecast. Specifically, this report notes that, as has now been the case for 31 of the past 33 years, the number of Southern Californians leaving for other regions and states exceeds the number entering from other regions and states; nonetheless, population continued to increase through 2019. Section 3.1 describes how negative net domestic migration is a longstanding feature of Southern California's demographics. Despite a temporary increase during COVID-19, per state Department of Finance Data (E-2 estimates) the level of "outflow" is in fact not growing and receded dramatically by mid-2023. In Los Angeles County in particular, population loss due to out-migration is at its lowest level since 2012. The technical report describes that a substantial portion of the recent population decline can instead be attributed to three principal factors related to COVID-19: a dramatic decrease in immigration due to border closures, excess deaths from the pandemic, and the temporary increase in "outflow."

The forecast's theme of "Slower Growth, Steady Improvement" is intended to capture the comparatively modest population growth envisioned here in the context of regional planning by emphasizing the continued need for housing, supportive infrastructure, and the opportunity it presents for improved environmental protection.

³ For each SCS, SCAG sends out a detailed "Data Verification" form for local jurisdictions to review the data and comment as appropriate.

The Plan makes extensive use of American Community Survey (ACS) data (see, e.g., <https://scag.ca.gov/post/american-community-survey-2022-data-release>) and the Survey of Work Attitudes and Attributes (www.wfhresearch.com) to develop model and plan assumptions for future travel to the portion of jobs (assumed to be 36.7 percent, see Plan Main Book, Chapter 2, page 32 – Rethinking the Plan) which can be performed at home. More information can be found in the Demographics & Growth Forecast Technical Report section 3.3.2. In addition, SCAG is beginning to rely upon location-based services data and integrating the recently released 2022 National Household Travel Survey into the ongoing planning and implementation processes.

The locally reviewed projections match the county and regional-level population, household, and employment totals developed by the expert and data-informed process described above, which account for migration and other demographic trends as well as the impact of work-from-home on region-level employment.

The process for developing and distributing the Growth Forecast to local jurisdictions and TAZs is further described in Section 3.0, *Introduction to the Analysis*, Subsection 3.0.1, *Environmental Impact Analysis*. As indicated therein, this distribution of growth represents one pattern of growth that could occur consistent with the Plan and is used to model and evaluate traffic, air quality (importantly regional consistency with federal requirements), per-capita GHG (importantly how the Plan could meet SB 375 targets), and general growth-related impacts. However, given the complexity in long-range forecasting, it would be technically incorrect to assume that one set of TAZ-level development assumptions provides the only approach for regional-level GHG reductions to meet targets. There is a myriad of potential TAZ-level growth projections that would meet the GHG reduction targets; in a region comprised of 13,062 TAZs, modeling all potential combinations of TAZ-level growth that could meet GHG targets would be impractical. Therefore, while SCAG undertakes detailed regional modeling including growth assumptions at the TAZ level to assess GHG impacts, the set of TAZ-level growth projections analyzed in Connect SoCal 2024 and in the 2024 PEIR is not the only set of assumptions that could ensure that per capital GHG emission reduction targets are met. Each local agency is responsible for the development within its jurisdiction and for determining consistency with the RTP/SCS. In this cycle, the Plan includes Regional Policies and Implementation Strategies that provide more local/fine-grain sustainable planning methods than past cycles. These policies and strategies provide for more than just land use distribution strategies, they also include other ways that communities can consider becoming more sustainable (including reducing VMT and/or GHG emissions). Some of the methods/factors that result in reduced VMT and/or GHG emissions are addressed through the models used by SCAG to evaluate the Plan, and include consideration of factors such as fuel composition, pricing strategies, as well as energy and water efficiencies. Detailed modeling of all Regional Policies and Implementation Strategies is challenging because there are (by design) numerous options and pathways toward implementation. Therefore, in addition to the growth and land use assumptions identified in the Plan and analyzed in the 2024 PEIR, the SCAG modeling is based on conservative, regional-level assumptions for a variety of factors.

Several comments requested that the Plan include language to reinforce the fact that local agencies making decisions regarding a project's consistency or alignment with Connect SoCal's 2024 Forecasted Regional Development Pattern need not rely on TAZ-level growth projection data or any aggregates thereof. Instead, such decisions should be evaluated based on the totality of goals, policies, and objectives of Connect SoCal 2024 and its PEIR in the context of the project in question. Such clarifying language has been added to the Plan: (1) in the main book in "supplementals" in a subsection entitled "Growth Data and SCS Consistency," (2) in the Land Use and Communities technical Report, Section 7.5, and (3) in the Demographics and Growth Forecast Technical Report, Section 5.5. In addition, a note has been added to maps summarizing the use of TAZ-level data as advisory and non-binding.

8.5.5 MASTER RESPONSE NO. 5: MITIGATION MEASURES

PLAN FEATURES

Some commenters asked for clarification as to what “Plan Features” are and how they work. The approach to reducing environmental impacts of the Plan has changed since preparation of the 2020 PEIR. Certain mitigation measures have been embedded within the Plan itself (as Regional Planning Policies and/or Implementation Strategies). As explained in Section 3.0.2, *Plan Features That May Reduce Impacts* (in particular page 3-8, footnote 3), moving such measures in to the Plan itself is consistent with CEQA Guidelines Sections 15064(f)(2) and 15126.4(a)(1)(A).

Some commenters suggested that SCAG initiatives that may also reduce environmental impacts, such as the voluntary Regional Advance Mitigation Programs (RAMP), should be included in the 2024 PEIR as mitigation measures. However, these initiatives and programs are either separate environmental programs already underway and/or have been incorporated as “Plan Features” in Connect SoCal 2024. Thus, while they are not included as mitigation measures in the 2024 PEIR, they would nonetheless be implemented and would ultimately result in the overall reduction of impacts to affected resources in the region. Previous SCAG mitigation measures that were not included in the Plan or completed (such as Greenprint), were carried forward into the 2024 PEIR as SCAG mitigation measures. In the same manner that lead agencies in the region have complete discretion regarding which project-level mitigation measures to implement and how to implement them, these agencies may also choose to utilize SCAG programs and initiatives (through Plan features or mitigation measures) to address potential impacts associated with future projects within their jurisdictions.

COMPLIANCE WITH EXISTING REGULATIONS

As explained in Subsection 3.0.3, *Compliance With Laws and Regulations*, in addition to embedding important mitigation measures in the Plan itself, the 2024 PEIR reduces the use of existing regulations as mitigation measures. In general, existing regulations are still identified as potential mitigation where additional clarifying details can be added or where there are opportunities for an agency to go above and beyond existing requirements. However, in general in the 2024 PEIR, applicable federal, state, and local laws, regulations, ordinances, rules, plans, and policies are summarized in the Regulatory Framework for each resource area and compliance with these regulations is assumed in the impact analyses. Compliance with existing regulatory requirements would be reasonably expected to reduce impacts of the Plan (see CEQA Guidelines Section 15126.4(a)(1)(B)).

In addition, local lead and implementing agencies coordinate with permitting agencies (e.g., air quality management districts, California Coastal Commission, California Department of Fish and Wildlife, etc.) and adopt and implement appropriate mitigation measures required based on the specific conditions of the project in compliance with applicable planning, zoning and environmental protection regulations.

The 2024 PEIR includes regulations as part of suggested project-level mitigation to provide for ensuring compliance and/or specifying the means of compliance where regulations lack specificity. In any event, requiring compliance with existing regulations as mitigation is consistent with CEQA. “[A] condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance.” *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 246 (quoting *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906). Indeed, in many cases, the regulations provide the standard for future (project-level) mitigation to satisfy CEQA. See *id.* (“These

regulations [requiring the development of hatchery genetic management plans] provide sufficient performance standards to satisfy CEQA.”). However, in many jurisdictions the identification of appropriate performance standards may be specific to local conditions. Similarly, to the extent that existing regulations and regulatory agency policies include references to “best management practices” or other general guidance, lead agencies must determine when and how best to employ such standards and/or practices to suit the specific project and conditions on a case-by-case basis to appropriately address impacts.

The 2024 PEIR summarizes applicable regulations that could reduce Plan impacts in the “Regulatory Framework” subsections of each environmental topic analyzed and the impact analyses take these regulations into account. However, the environmental regulatory framework is not static, regulations and guidance relevant to the environment are continuously being strengthened and new regulations added at all levels of government. These changes to the regulatory context will further reduce impacts of the Plan.

LEVEL OF DETAIL IN CEQA MITIGATION MEASURES FOR A PROGRAM EIR

Mitigation measures are subject to the same rules regarding level of detail appropriate to the EIR being prepared. In this case, the 2024 PEIR addresses a large-scale region with a variety of projects spread over more than 20 years. As explained in Section 3.0, *Introduction to the Analysis*, Subsection 3.0.4, *Mitigation Measures*, the 2024 PEIR includes two types of mitigation, those to be implemented by SCAG and those to be implemented by lead and implementing agencies as appropriate (see discussion of SCAG’s Ability to Impose Mitigation on Other Jurisdictions and “Can and Should” Language below). As further explained in Subsection 3.0.1, *Environmental Impact Analysis*, the 2024 PEIR presents a regional level analysis (refer also to **Master Response No. 4, Regional Development Pattern and Growth Forecast**), given the size of the region, the lack of detail with respect to individual projects, and the minimum 20-year period, the 2024 PEIR provides a programmatic regional-level analysis; detailed analysis at the subregional level or local level is not presented.

The 2024 PEIR identifies program-wide measures for implementation by SCAG. As appropriate and authorized by the CEQA Guidelines and case law, the program-wide SCAG mitigation measures included in this 2024 PEIR are less detailed than those that would be part of a project EIR and the selection of detailed applicable mitigation measures is more properly determined during future project-specific CEQA reviews. It is ultimately up to the lead agency to determine the applicability and appropriateness of mitigation measures based on project-specific circumstances.

Mitigation measures to be implemented by SCAG focus on information sharing since information sharing is in line with and a critical part of SCAG’s role in the region. By facilitating sharing of technical and scientific information SCAG facilitates understanding of issues (including environmental impacts), communication among scientists and decision-makers and innovates and accelerates problem-solving including mitigation identification and implementation. SCAG uses a variety of communication tools and frequency of coordination varies as appropriate to address the issues at hand. No further details are appropriate at this stage as such details could serve to limit the coordination.

While the 2024 PEIR strives to provide as much detail as possible in the mitigation measures, some flexibility must be maintained to present mitigation approaches for impacts occurring over a large geographic scope and caused by a wide variety of transportation and land use activities. CEQA case law provides that a first-tier EIR may contain generalized mitigation criteria (see, e.g., *Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 29).

SCAG'S ABILITY TO IMPOSE MITIGATION ON OTHER JURISDICTIONS

As explained in PEIR Subsection 3.0.4 *Mitigation Measures*, SCAG has no land use authority and no purse-string authority over transportation projects and therefore has no ability to impose mitigation at the local/project level.

CEQA requires that SCAG identify all feasible mitigation measures in the 2024 PEIR that will avoid or substantially lessen the significant environmental effects of the project.^{4,5,6} CEQA, however, does not require a lead agency to undertake identified mitigation measures, even if those measures are necessary to address a project's significant environmental effects, if the agency finds that the measures "are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency"⁷ (*City of Marina v. Bd. of Trustees of the Calif. State Univ.* (2006) 39 Cal.4th 341, 366; refer also to *Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal. 4th 439). Under these circumstances, the lead agency may find that the measures "can and should" be implemented by the other agency or agencies said to have exclusive responsibility/jurisdiction over the measures (*City of Marina*, 39 Cal. 4th at 366). As the CEQA Guidelines explain, the "finding in subsection (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives."⁸

Furthermore, SB 375 specifically provides that nothing in an SCS supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use policies and regulations, including their general plans, to be consistent with the SCS or an alternative planning strategy.⁹ Moreover, cities and counties have plenary authority to regulate land use through their police powers granted by the California Constitution, art. XI, Section 7, and under several statutes, including the local planning law,¹⁰ the zoning law,¹¹ and the Subdivision Map Act.¹² As such, SCAG has no concurrent authority/jurisdiction to implement mitigation related to land use plans and projects that implement the Plan. With respect to the transportation projects in the Plan, these projects are to be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments (i.e., cities and counties), and not SCAG. SCAG also has no authority/jurisdiction to require these agencies to implement project-specific mitigation measures.

Note that this 2024 PEIR does not rely on the project-level mitigation measures being implemented in making significance findings (since the measures are within the jurisdiction of other agencies and cannot be implemented by SCAG).

"CAN AND SHOULD" LANGUAGE IN PROJECT-LEVEL MITIGATION

Several comments addressed the "... can and should ..." language in project-level mitigation and some requested that it be removed to clarify that it is optional and some requested "where applicable and feasible" be added to each measure. As noted above, this language is taken directly from CEQA and is used for project-level mitigation

⁴ California Legislative Information, Chapter 1. Policy [21000-21006].

⁵ California Legislative Information. Chapter 2.6. General [21080-21098].

⁶ CEQA. Article 9. Contents of Environmental Impact Reports.

⁷ California Legislative Information. Chapter 2.6. General [21080-21098].

⁸ CEQA. Article 7. EIR Process.

⁹ California Legislative Information. Public Resources Code – PRC, Division 13. Environmental Quality, Chapter 2.5. Definitions [21060-21074].

¹⁰ California Legislative Information. Chapter 3. Local Planning 65100-65763.

¹¹ California Legislative Information. Chapter 4. Zoning Regulations 65800-65912.

¹² California Legislative Information. Division 2 Subdivisions 66410-66499.38.

where mitigation of impacts is outside SCAG's jurisdiction. However, in the introductory paragraph to each project-level measure this language supplemented with "... as appropriate and feasible ..." and with the flexibility to replace suggested mitigation with:

"... other comparable measures identified by the lead agency ..." SCAG recognizes that there are a myriad of projects, environmental settings, community sensitivities and other factors that affect lead agency decisions on what, where and how to require mitigation at the project level. SCAG does not presume to usurp local authority, instead, the project-level mitigation measures identified in the 2024 PEIR are generally typical measures frequently used for each impact and they are intended to be a toolbox for local agencies to use "as applicable and feasible."

Other comments questioned uses of other phrases within each measure such as "wherever practicable" and similar phrases. As noted above the intent of the measures included in the 2024 is to provide a toolbox (as opposed to a check list) and that each lead agency should include, not include, or modify measures as they deem necessary to address impacts at the project level. Lead and implementing agencies may also identify other comparable measures capable of reducing impacts below the specified threshold.

For projects proposing to streamline environmental review or for projects otherwise tiering off this 2024 PEIR, the project-level mitigation measures described in this 2024 PEIR (or comparable measures) can and should be considered and adopted by lead agencies (and project sponsors) during the subsequent, project- or site-specific environmental reviews for transportation and development projects as applicable and feasible. However, SCAG cannot require lead agencies to adopt mitigation, and it is ultimately the responsibility of the lead agency to determine and adopt project-specific mitigation as appropriate and feasible for each project.

The project-level mitigation measures used in this 2024 PEIR recognize the limits of SCAG's authority; distinguish between SCAG commitments and project-level responsibilities and authorities; optimize flexibility for project implementation; and facilitate CEQA streamlining and tiering where appropriate on a project-by-project basis determined by each lead agency.

8.5.6 MASTER RESPONSE NO. 6: ALTERNATIVES

Over the last several years Connect SoCal 2024 has been guided by regional stakeholders, including the involvement of thousands of Southern Californians through coordination with local jurisdictions, regional planning working groups, outreach to traditionally underrepresented groups through community-based organizations, and numerous public workshops. SCAG conducted one-on-one meetings with the majority of local jurisdictions through a 10-month long local data exchange (LDX) process (see Chapter 2, *Project Description*, to learn more about the Plan's LDX process). Additional refinements were made after the Plan's public review and comment period and incorporated as part of the Final Plan (see Chapter 9, *Clarifications and Revisions*). Therefore, Connect SoCal 2024's growth vision reflects jurisdictional-level input on future development. To help the region achieve sustainable outcomes, Connect SoCal 2024's growth vision focuses growth within jurisdictions in Priority Development Areas (PDAs) that are generally located near destinations and mobility options, and promote an improved jobs-housing balance to reduce commute lengths and times. This is reflective of Connect SoCal 2024's Core Vision: a healthy, prosperous, accessible and connected region for a more resilient and equitable future.

As discussed in Chapter 2, *Project Description*, Connect SoCal 2024 is a regional snapshot in time. Based on what is known today, the Plan outlines the region's vision for addressing current challenges and achieving regional

goals. After each RTP/SCS cycle, SCAG monitors progress, and every four years adjusts the vision, assesses new challenges, and articulates new regional goals. As such, this Plan is a continuum of progress across each planning cycle by building upon the steps and efforts taken by local agencies.

Since the passage of SB 375 in 2008, SCAG has developed three RTP/SCSs (2012, 2016 and 2020). As a result of these past regional plans as well as other factors (state regulations, societal changes), the region as a whole is trending toward more sustainable growth as local agencies incorporate RTP/SCS and other sustainable concepts into their own general/local plans. As the RTP/SCS is updated and improves each four-year cycle, the regional-scale land use growth pattern for the CEQA-required No Project alternative (i.e., the pattern expected to occur without Connect SoCal 2024) and the regional-scale options for currently reasonably foreseeably feasible intensification of land uses are getting closer to the regional-scale land use development pattern of the Plan (refer also to **Master Response No. 4, Regional Development Pattern and Growth Forecast**).

In this cycle, the Plan includes Regional Policies and Implementation Strategies that provide for more local/fine-grain sustainable planning methods than past cycles. These policies and strategies provide for more than just land use distribution strategies, they also include other methods of being sustainable (including reducing VMT and/or GHG emissions). Some of the methods/factors that result in reduced VMT and/or GHG emissions are addressed through the models used by SCAG to evaluate the Plan (transportation, air quality/GHG and SPM). However, detailed modeling of all policies and strategies is challenging because there are (by design) numerous options and pathways for individual agencies to implement them. For the alternatives analysis, SCAG's models address factors such as fuel composition, pricing strategies, as well as energy and water efficiencies. However, other factors, such as total population, were applied in the same way to each alternative since they are generally outside the control of SCAG and/or do otherwise not warrant evaluation through a separate alternative. Refer to PEIR Chapter 4, *Alternatives*, for additional details.

In previous RTP/SCS development cycles, PEIR alternatives included: 1) the land use growth pattern of the previous plan and 2) an alternative that reflected Local Input. This cycle, SCAG refined the Connect SoCal 2024 planning process, which starts with data collection and research. Instead of a scenario planning process, SCAG staff started with the Local Input growth pattern and then refined it based on regional growth strategies, follow up local input (including integrating new projects and entitlements), and regional trends. Transportation projects and programs were sourced from the County Transportation Commissions (CTCs) while land use and growth were sourced from local jurisdictions based on local data input. Follow up local input included integrating new projects and entitlements at the local level. As a result, Connect SoCal 2024 is SCAG's first RTP/SCS to not substantially modify local data inputs. Given this shift in the RTP/SCS planning for this cycle and in the absence of planning scenarios, SCAG modified the approach to formulating Plan PEIR alternatives. A "local input" alternative raised by some commenters is not needed because the growth projections for Connect SoCal 2024 reflect what was previously identified as the Local Input alternative.

As discussed in the PEIR Alternatives chapter, Section 4.1, *Introduction*, and Section 4.2, *Methodology for Developing Plan Alternatives*, SCAG developed two alternatives for analysis as the "book-ends" in the 2024 PEIR. Each alternative consists of a transportation network element and a land use pattern element. The following alternatives are evaluated:

1. No Project Alternative:
2. Intensified Land Use Alternative

The No Project Alternative, required under CEQA, evaluates “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Guidelines Section 15126.6(e)(2)). For purposes of the PEIR, land use pattern for the No Project Alternative assumes continuation of goals and policies of the adopted 2020 RTP/SCS, as amended, with no new sets of regional planning policies or implementation strategies from Connect SoCal 2024. The transportation network under the No Project Alternative would include all existing regionally significant highway and transit projects, all ongoing TDM or Transportation System Management (TSM) activities, and all projects that are undergoing right-of-way acquisition, are currently under construction, have completed the NEPA process, or are in the first year of the previously conforming FTIP (2023 FTIP) (FY2022/2023).

The Intensified Land Use Alternative is based on more aggressive land use development patterns than the Plan. The land use pattern in this alternative would be denser and build on land use strategies described in the Plan by increased growth around PDAs and beyond to maximize transit opportunities. The focus of this alternative is on increased densities adjacent to existing employment and transportation infrastructure, which would lead to fewer and shorter trips and therefore a reduction in VMT as compared to the Plan. It includes the same transportation investments as the Plan.

Each of the alternatives and the Plan is based on local input. The growth patterns for the Plan and No Project Alternative are both consistent with adopted general plans and zoning. However, in some locations, the Intensified Land Use Alternative may increase density beyond existing general plans.

A more detailed description of each of these alternatives, followed by a comparative analysis of how well the alternative would achieve the project objectives and the relative level of environmental impact associated with each alternative as compared to implementation of Connect SoCal 2024 is provided in Chapter 4, *Alternatives*.

As explained in Section 4.6, *Alternatives Considered but Rejected*, in Chapter 4, *Alternatives*, of the 2024 PEIR, SCAG did not identify additional alternatives that were rejected because the two selected alternatives provide expected “book-ends” of the range of potential alternatives to present a framework for understanding the greatest or least potential impacts from alternatives when compared to the Plan. Therefore, there could be alternatives not specifically analyzed but whose impacts could fall within the range and magnitude of impacts captured in the bookend analysis. As such, only two alternatives were identified for comparative analysis: The No Project Alternative and one other potentially feasible RTP/SCS alternative that places additional emphasis on infill development and transit (Intensified Land Use Alternative).

The alternatives approach used for this 2024 PEIR brackets the range of reasonable regional land use strategies, such that the No Project Alternative includes the most dispersed land use pattern, and the Intensified Land Use Alternative represents the most compact land use pattern. The land use development pattern for the Plan falls somewhere in-between the No Project Alternative and the Intensified Land Use Alternative. As such, the two selected alternatives provide expected “book-ends” of the range of potential alternatives to present a framework for understanding the greatest potential impacts from alternatives when compared to the Plan. The evaluations are both quantitative and qualitative as means for evaluating the comparative merits of each alternative to the Plan, and ultimately identifying the environmentally superior alternative.

Some commenters requested that SCAG consider a population decline alternative. As noted above the Plan and alternatives are based on a detailed process that is revisited every four years. The 2024 Plan is based on a population forecast that is much less than the 2020 Plan (just over half the population growth over the next three decades). It is not reasonably foreseeable based on current data to see a population decline, but data and trends

will be revisited for the next Plan and adjustments will be made accordingly. The purpose of the Alternatives analysis is to identify alternatives to the project that could reduce impacts. It is not anticipated that the Plan would substantially impact the population forecast. The foundational planning assumptions that comprise the Growth Forecast were developed over a multi-year period with a panel of experts, stakeholder input, as well as review by local agencies as described in the Plan's Demographics and Growth Forecast Technical Report. As explained above in **Master Response 4, Regional Development Pattern and Growth Forecast**, the Growth Forecast represents a reasonable estimate of future population based on substantial evidence.

8.6 RESPONSES TO COMMENTS RECEIVED ON THE 2024 DRAFT PEIR

Numbered responses to each comment received are provided in the following section, which are organized based on the original bracketed comment letters included in **Appendix H, Comment Letters Received on the 2024 Draft PEIR**. Individual comments within each letter are numbered and the response is given a matching number.

8.6.1 LETTER SOV 1: AGUA CALIENTE BAND OF CAHUILLA INDIANS

Luz Salazar, Cultural Resources Analyst
Tribal Historic Preservation Office
Agua Caliente Band of Cahuilla Indians
5401 Dinah Shore Drive
Palm Springs, CA 92264

January 12, 2024

RESPONSE SOV 1-1

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above. SCAG will provide updates to Agua Caliente Band of Cahuilla Indians regarding the progress or status of the Connect SoCal 2024 project, including any relevant changes to the 2024 Draft PEIR.

RESPONSE SOV 1-2

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.2 LETTER FED 1: NAVAL BASE VENTURA COUNTY

Captain R. B. Kimnach III, Commanding Officer
Department of the Navy
Naval Base Ventura County
311 Main Road, Suite 1
Point Mugu, Ca 93042-5033

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001818** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE FED 1-1

This comment provides an introductory statement regarding the comments provided in this letter. Refer to **Responses FED 1-2** to **FED 1-6** below, for responses to the individual comments contained herein.

RESPONSE FED 1-2

The STRAHNET street network is updated regularly and is available on the Federal Highway Administration (FHWA)'s website (<https://www.fhwa.dot.gov/policy/2004cpr/chap18.cfm>). Each of the County Transportation Commissions (CTCs) in the region is responsible for integrating these networks as appropriate into their network planning and project lists. It is the responsibility of the U.S. Department of Defense and California National Guard to ensure defense readiness for a given facility or installation. In the context of the ability to move military personnel and resources within the region, the Plan addresses mobility, including goods movement, as being a key consideration in regional transportation planning as it is a major contributor to the regional economy. The Plan facilitates more efficient movement of people and goods, including military personnel and resources, within the region. As discussed in Section 3.17, *Transportation*, of the 2024 PEIR the Plan would reduce per capita VMT in the region and total delay (see Tables 3.17-15 and 3.17-16). The Plan also includes billions of dollars in transportation improvement projects whose implementation would generally be expected to improve mobility and transportation efficiency for all users over the Plan horizon, which would also be supportive of overall defense readiness for military installations in the region. Also refer to **Response FED 1-6** below.

RESPONSE FED 1-3

As noted by the commenter, SCAG acknowledges that sea level rise is an existing environmental stressor and with the ongoing effects of global climate change it is expected to be exacerbated as ocean temperatures rise. As such, the Plan includes policies and strategies intended to facilitate resilience and adaptation programs, including programs for coastal communities and infrastructure programs, as well as investments in new infrastructure and in maintaining existing facilities. As discussed in the 2024 PEIR, including in Section 3.10, *Hydrology and Water Quality*, and Section 3.19, *Utilities and Service Systems*, SCAG regional mitigation measures and project-level mitigation measures are provided to address regional and project-specific impacts from sea level rise and associated effects such as erosion, flooding, and damage to existing facilities and infrastructure. In addition, as

noted on page 3.8-43 in Section 3.8, *Greenhouse Gas Emissions*, “[a]s part of its Sustainability Program, SCAG has provided funding assistance for such local GHG emissions inventory efforts and local climate action plans. Jurisdictions within the SCAG region that have undertaken plans and initiatives addressing climate change are shown in Table 3.8-6, Jurisdictions Addressing Climate Change in the SCAG Region (2023).” Also refer to **Master Response No. 5, Approach to Mitigation Measures**, above.

RESPONSE FED 1-4

One of the absolute land use constraints mapped by SCAG is military lands (Absolute Constrained Areas or ACAs). There are a number of other ACAs that are identified and mapped as part of SCAG’s identification of GRRAs (see Map 2-10 in the PEIR for the GRRAs). Separate mapping of each ACA is not necessary for the PEIR analysis. A map of military bases in California is available here: <https://militarybases.com/california>.

RESPONSE FED 1-5

Separate identification and discussion of each military base in the SCAG Region along with identification of current and future mission’s and land use compatibility needs is appropriate as part of local-level future planning efforts and not part of a regional planning analysis. As noted in **Response FED 1-4** above, military bases are one of the absolute land use constraints taken into account in identification of GRRAs in the Plan.

RESPONSE FED 1-6

The Highways for National Defense (HND) program within the Surface Deployment and Distribution Command Transportation Engineering Agency (SDDCTEA) of the Department of Defense performs studies of specific routes linking the most vital military installations with their respective seaports and airports of embarkation. These studies are referred to as Power Projection Platforms (PPP) Route studies. When a PPP Route study identifies the need to add a roadway to the STRAHNET, the HND in partnership with FHWA will coordinate with the state department of transportation and any applicable MPOs to process the inclusion into the National Highway System. SCAG's role is one of concurrence. Refer to <https://www.sddc.army.mil/sites/TEA/Functions/SpecialAssistant/Pages/HighwaysNationalDefense.aspx> for the latest STRAHNET maps. Local agencies are responsible for coordination with military installations within and adjacent to their jurisdictions. Connect SoCal 2024 is a regional-scale planning document and as such local-level planning factors are not addressed. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding level of detail.

RESPONSE FED 1-7

Refer to **Response FED 1-2** above regarding the STRAHNET street network. Refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding level of detail; critical modes of access and transportation needs with respect to the STRAHNET street network for both people and cargo is addressed at the local level. As also noted in **Response FED 1-2**, each of the CTCs in the SCAG region is responsible for integrating these networks as appropriate into their respective network planning and project lists. No further response is necessary.

RESPONSE FED 1-8

As relates to economic effects noted in the California Defense Spending and Economic Impacts Data, see **Master Response No. 2, General Comments and Non-CEQA Issues**, above. As noted in Master Response No. 2, economic considerations in and of themselves are not relevant to the analysis of environmental impacts under CEQA. Therefore, evaluation of this issue in the 2024 PEIR is not appropriate, and no further response is necessary.

RESPONSE FED 1-9

As noted above, local planning agencies are responsible for ensuring local plans are consistent with applicable guidance such as the *California Advisory Handbook for Community and Military Compatibility Planning*. As such, SCAG does not play a role in local planning agency efforts regarding compatibility with military installations and related uses. No further response is necessary.

RESPONSE FED 1-10

Refer to **Responses FED 1-2 and FED 1-4** above regarding the STRAHNET transportation network. This comment does not raise a substantive comment regarding the 2024 PEIR or the analysis contained therein. No further response is necessary.

RESPONSE FED 1-11

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.3 LETTER STA 1: CALIFORNIA DEPARTMENT OF TRANSPORTATION AERONAUTICS PROGRAM

California Department of Transportation
Aeronautics Program
Division of Transportation Planning
P.O. Box 942873, MS-40
Sacramento, Ca 94273-0001

January 12, 2024

RESPONSE STA 1-1

This comment provides an introductory statement regarding the comments provided in this letter. Refer to **Responses STA 1-2 to STA 1-4**, below, for responses to the individual comments contained herein.

RESPONSE STA 1-2

Connect SoCal 2024 is a regional-scale planning document and as such does not address development and density around airports at the local planning level (please see **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, above). Individual land use and transportation projects within airport influence areas (ALA) would be reviewed for land use compatibility by state, local, and federal jurisdictions. PMM-NOI-1 identifies options for mitigation measures for individual land use and transportation projects to reduce ambient noise levels as deemed feasible and appropriate by lead agencies. Suggested mitigation measures include permanent noise barriers and sound-attenuating features between noise sources and noise-sensitive land uses (residential areas, schools, hospitals, senior homes, etc.). Additionally, as stated in the 2024 PEIR on page 3.13-38, state law mandates Airport Land Use Compatibility Plans (ALUCP) for major public airports, with policies and planned efforts to minimize the public's exposure to excessive noise and safety hazards in areas near or adjacent to airports. Finally, each county and city in the SCAG region is required to adopt safety and noise elements as part of their General Plans. SCAG anticipates that local jurisdictions would conduct environmental reviews for projects within or near sensitive airport zones.

As stated in the 2024 PEIR on page 3.13-36, "SCAG does not have any regulatory, developmental, operational, or planning authority over the airports and airport operations. Rather, SCAG is primarily a regional surface transportation planning agency that maintains a list of airport ground access projects and a consultative relationship with the airports."

Regional-scale noise related impacts from airports are addressed under Impact NOI-3 of the 2024 PEIR. Noise impacts are driven by forecasts for aviation growth in the SCAG region, as addressed in the Connect SoCal 2024 Aviation and Airport Ground Access Technical Report. As discussed on page 3.13-37 in Section 3.13, *Noise*, of the 2024 PEIR, airport operations are expected to grow from 3.79 million operations in 2019 to 4.76 million operations in 2050, which all else being equal, may increase noise levels by 1.0 dB. PMM-NOI-1 identifies options for lead agencies to consider for reducing ambient noise levels in the vicinity of an individual land use or transportation project.

RESPONSE STA 1-3

As noted above in **Response STA 1-2**, state law mandates ALUCPs for major public airports, and each county and city in the SCAG region is required to adopt safety and noise elements as part of their General Plans. SCAG anticipates that local jurisdictions would conduct environmental reviews as necessary and appropriate for projects within or near sensitive airport zones, where noise and safety hazards are heightened. Connect SoCal 2024 is a regional-scale planning document and as such does not address development and density around airports at the local planning level. Refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, above.

RESPONSE STA 1-4

This comment provides a closing statement regarding the comments provided in this letter. SCAG will continue to collaborate with aviation stakeholders on regional aviation planning issues.

8.6.4 LETTER STA 2: CALIFORNIA DEPARTMENT OF TRANSPORTATION

California Department of Transportation
District 7
100 South Main Street, Suite 100
Los Angeles, Ca 90012

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission IDs 0001764 and 0001765** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE STA 2-1

This comment provides an introductory statement regarding the comments provided in this letter. Refer to **Responses STA 2-2 to STA 2-11**, below, for responses to the individual comments contained herein.

RESPONSE STA 2-2

Information regarding the presence of substantial lithium deposits in the southern Salton Sea area of Imperial County is acknowledged. Text is added regarding estimated lithium deposits in Imperial County, see Chapter 9, Section 9.4, for text revisions to page 3.12-2.

RESPONSE STA 2-3

As requested by the commenter, the legend on Map ES-2 (as well as on Map 2-2) is updated. Refer to Chapter 9, Section 9.4, for revisions to Map ES-2.

RESPONSE STA 2-4

Refer to Chapter 9, Section 9.4, revisions to page 3.18-2 under Tribal Cultural Resources, for modifications to Tribe names.

RESPONSE STA 2-5

The specific types of vulnerable road users that are the targeted beneficiaries of Complete Streets presented in the PEIR reflect the discussions of Complete Streets in Connect SoCal 2024 (see pages 88, 93, 114, and 124 in Chapter 3, *The Plan*, and pages 23, 27, 88, and 117, and Appendix 7, *Regional Complete Streets Policy*, in the Mobility Technical Report). The requested additions are not germane to the analysis presented in the 2024 PEIR. No further response is necessary.

RESPONSE STA 2-6

Refer to Chapter 9 and Appendix J for the revisions to Map 2-11.

RESPONSE STA 2-7

Refer to Chapter 9, Section 9.4, for the revisions to page 3.17-13 to describe Class III facilities.

RESPONSE STA 2-8

Refer to Chapter 9, Section 9.4, for revisions to page 3.17-27 providing additional details regarding the California Integrated Travel Project.

RESPONSE STA 2-9

The 2024 PEIR includes various maps to illustrate regional conditions and Plan effects on future development patterns and other land use considerations. The comment does not identify what additional figures could clarify the text and does not raise a substantive issue regarding the 2024 PEIR the Plan's impact on the physical environment under CEQA, or the analysis provided therein. No further response is necessary.

RESPONSE STA 2-10

The 2024 PEIR provides a regional-scale analysis and regional scale mitigation; details of potential impacts of individual projects and available mitigation sites would be analyzed by lead agencies for these projects. Also refer to **Master Response No. 5, Approach to Mitigation Measures**, above.

RESPONSE STA 2-11

The commenter's request to further leverage strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches is acknowledged. However, this comment does not raise a substantive issue regarding the 2024 PEIR, the Plan's impact on the physical environment under CEQA, or the analysis provided therein. No further response is necessary.

8.6.5 LETTER STA 3: CALIFORNIA HIGHWAY PATROL

Sergeant Kevin Long
California Highway Patrol
Border Division Administrative Assistant
9330 Farnham Street, San Diego, CA 92123
Kevin.Long@chp.ca.gov

January 12, 2024

RESPONSE STA 3-1

As discussed under Impact TRA-3 in the 2024 PEIR, safety hazards could result in specific locations under the Plan, including in locations where local traffic congestion causes a backup of vehicles onto freeway mainlines. Text is added to the 2024 PEIR to note this potential hazard. Refer to Chapter 9, Section 9.4, for changes to page 3.17-52 and related text modifications.

To the extent the commenter is suggesting the PEIR include measures to reduce safety impacts, please also refer to **Master Response No. 5, Mitigation Measures**, and **Master Response No. 5, Level of Detail in a Program Versus Project EIR**, above. As noted therein, impacts and mitigation in the 2024 PEIR are assessed at the regional level and it is anticipated that as local agencies review projects in their jurisdictions they will assess impacts and impose mitigation as necessary to address such safety hazards. In addition, if the commenter has identified a specific roadway project that could address safety issues, it can be submitted to the Riverside County CTC as part of the call for projects for the next RTP cycle.

RESPONSE STA 3-2

Refer to **Response STA 3-1** above. With regard to potential effects on emergency response associated with traffic congestion along major transportation corridors, this issue is addressed under Impact HAZ-6 in Section 3.7, *Hazards and Hazardous Materials*, of the 2024 PEIR. As discussed therein, although it is anticipated that at a regional scale, overall vehicular congestion would decrease with Plan implementation, localized congestion could occur in existing locations where the street network is physically constrained and improvements to alleviate acute congestion are not available, which could adversely affect emergency access, thus resulting in potentially increased emergency response times under these circumstances. As such, while mitigation measures are provided to reduce potential effects to emergency access and response times, impacts in this regard are concluded to be significant and unavoidable.

RESPONSE STA 3-3

The internal communications of the commenting organization and attached Notice of Completion form for the 2024 PEIR do not raise any substantive issues regarding the 2024 PEIR or its contents. No further response is necessary.

RESPONSE STA 3-4

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.6 LETTER REG 1: IMPERIAL IRRIGATION DISTRICT

Donald Vargas, Compliance Administrator II
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

January 11, 2024

RESPONSE REG 1-1

This comment provides an introductory statement regarding the comments provided in this letter. Refer to **Responses REG 1-2 to REG 1-11**, below, for responses to the individual comments contained herein. The commenter is also referred to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, above.

RESPONSE REG 1-2

Local jurisdictions, state agencies, and other agencies are responsible for implementing specific transportation projects and policies. SCAG does not play a role in local planning agency efforts to determine a development project's compatibility with irrigation and drainage systems and related uses. SCAG recognizes IID's planning review process for transportation projects as part of these determination efforts. PMM-HYD-1 of the Draft PEIR requires individual land use and transportation projects to comply with various municipal regional stormwater permits to prevent potential increases in stormwater runoff levels resulting from the project. Applicable low impact development requirements related to drainage patterns, stormwater runoff permits, and the municipal stormwater program are discussed in Section 3.10.2, *Regulatory Framework*.

RESPONSE REG 1-3

As stated above, SCAG recognizes IID's planning review process, and does not play a role in local planning agency efforts to determine a land use or transportation project's compatibility with electrical utilities and related uses. Proponents of individual land use or transportation projects would be required to demonstrate the project's compatibility with local zoning, design, right-of-way, and permits requirements.

RESPONSE REG 1-4

As stated on page 3.19-45 of the 2024 PEIR: "future projects would typically require a separate environmental review to determine impacts to electricity services and facilities within their respective local jurisdiction(s)." Connect SoCal 2024 is a regional-scale planning document and as such local-level planning requirements for individual projects are not addressed. With respect to the comment's assertion that the costs of developing feasibility/impact studies for a project shall be borne by the project's applicant, each lead agency determines how costs are paid for.

RESPONSE REG 1-5

As stated on page 3.19-45 of the PEIR, under the header "Electricity": "[I]mpacts [to electricity services and facilities] from future construction or relocation work would normally be anticipated to be less than significant as they would likely be constructed and/or installed in the existing right of way. These and similar public easements have been

previously disturbed; in these instances, substantial adverse impacts would not be expected to occur.” SCAG recognizes state and local design requirements for any proposed electrical infrastructure projects which may impact IID facilities and operations. As noted in Master Response No. 3, Connect SoCal 2024 is a regional-scale planning document and as such local-level planning requirements are not addressed.

RESPONSE REG 1-6

SCAG recognizes the authority of state and local jurisdictions and public agencies to establish zoning and land use regulations for the development of utilities infrastructure. As noted in **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, Connect SoCal 2024 is a regional-scale planning document, and as such, local-level utility easement requirements are not addressed.

RESPONSE REG 1-7

Refer to **Response REG 1-6**, above.

RESPONSE REG 1-8

As discussed on page 3.19-39 under the header “Methodology” of the 2024 PEIR: “[T]he Plan’s potential to trigger the need for new or expanded electricity, natural gas, or telecommunications infrastructure is analyzed to determine whether or not there will be a significant impact.” As stated on page 3.19-45 under the header “Summary” of the 2024 PEIR, transportation and development projects are consistent with the Forecasted Regional Development Pattern and are anticipated to result in the construction of new and/or expanded electricity facilities, the construction of which could result in significant impacts. Therefore, the Plan is considered to have a significant impact on electricity facilities. The 2024 PEIR identifies mitigation measures for local agencies to consider in addressing any identified significant impacts at the project level including PMM-UTL-1 and PMM-UTL-2. Refer to Section 3.6, *Energy*, of the 2024 PEIR for a discussion of impacts regarding energy demands, consumption, and efficiency requirements regarding energy resources in the region, including electricity. SCAG recognizes that the responsibility of implementing any mitigation necessary resulting from the construction, relocation, and/or upgrade of IID facilities falls on the project proponent.

RESPONSE REG 1-9

SCAG acknowledges the State CEQA Guidelines which define a project as “the whole of the action” (refer to CEQA Guidelines section 15003(h)). As noted in Master Response No. 3, Connect SoCal 2024 is a regional-scale planning document and as such does not address or evaluate the conformity of individual land use and transportation projects with State CEQA Guidelines.

RESPONSE REG 1-10

Refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, and also as stated in page 3.9-46 of the 2024 PEIR: “As part of standard development procedures in most cities, plans are submitted for review and approval to ensure all new development has adequate emergency access and escape routes (clearly marked and delineated) in compliance with existing regulations.” Therefore, in the event of an outage or failure of essential electrical facilities, such facilities would provide adequate emergency access for immediate repairs. As stated above, Connect SoCal 2024 is a regional-scale planning document and as such does not address or evaluate

the conformity of individual land use and transportation projects with local design guidelines regarding landscaping around electrical facilities.

RESPONSE REG 1-11

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.7 LETTER REG 2: TRANSPORTATION CORRIDOR AGENCIES

Transportation Corridor Agencies
125 Pacifica
Irvine, CA 92618

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001751** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE REG 2-1

This comment provides an introductory statement regarding the comments provided in this letter. Refer to **Responses REG 2-2 and REG 2-3** below, for responses to the individual comments contained herein.

RESPONSE REG 2-2

This comment expresses general support for the comments submitted by OCCOG. Refer to responses to Letter SUB-1 (OCCOG) in this chapter.

RESPONSE REG 2-3

This comment does not raise any specific comments regarding the 2024 PEIR. Refer to discussion in Chapter 9, Section 9.3.4, *Summary of Revisions*, regarding changes to the Plan documents and relationship to changes in the 2024 PEIR. Also, as noted above, refer to **Submission ID 0001751** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE REG 2-4

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.8 LETTER SUB 1: ORANGE COUNTY COUNCIL OF GOVERNMENTS

Orange County Council of Governments
3972 Barranca Parkway, Ste. J 127
Irvine, CA 92606

January 11, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission IDs 0001766 and 0001778** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE SUB 1-1

These comments provide introductory statements and background information regarding the comments provided in this letter. Refer to **Responses SUB 1-2 to SUB 1-190**, below, for responses to the individual comments contained herein.

RESPONSE SUB 1-2

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above. SCAG acknowledges OCCOG's concurrence with comments provided in Letter TRANS 1 (OCTA); refer to responses to Letter TRANS 1 in this chapter.

RESPONSE SUB 1-3

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, and **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above.

RESPONSE SUB 1-4

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, **Master Response No. 3, Level Of Detail in a Program EIR versus Project EIR**, and **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above.

RESPONSE SUB 1-5

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above. For more information regarding TWG's role in the development of the RTP/SCS refer to **Submission ID 0001766.08**. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above, regarding comments on SCAG's style guide. With regard to the public review period for the 2024 PEIR, SCAG provided a 65-day public review period, which exceeds the minimum 45-day review required by CEQA. In addition, as noted by the commenter, the review period for the 2024 PEIR was the longest PEIR review period out of the last four RTP cycles.

RESPONSE SUB 1-6

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above, regarding comments germane to the Plan, and **Master Response No. 6, Alternatives**, above. As discussed in **Master Response No. 4, Regional Development Pattern and Growth Forecast**) the forecasted growth was based on the most up-to-date planning inputs.

RESPONSE SUB 1-7

The 2024 PEIR does not contain references to Uber or Lyft. Page 3.8-61 of the 2024 PEIR discusses electrification as a strategy under the SCAQMD 2016 AQMP to reduce GHG emissions. Page 3.8-64 discusses electrification as a potential technology to reduce emissions through 2050, based on CARB's research efforts. Other technological efforts to reduce emissions, electrify the transportation system, and transition to zero-emission vehicles as part of the CARB Mobile Source Programs are discussed in pages 3.3-26 through 3.3-30. As such, the discussion presents options for future technologies but does not express a preference and is not intended to establish a bias for one technology and service over another. Nonetheless, some language is modified to address language neutrality. Refer to Chapter 9, Section 9.4, for applicable revisions to mitigation measure PMM-GHG-1 on page ES-47. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE SUB 1-8

The comment does not raise a substantive issue regarding the 2024 PEIR or the analysis contained therein. Nonetheless, some language is modified to address language tone. Refer to Chapter 9, *Clarifications and Revisions*. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE SUB 1-9

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding the use of "can and should" in mitigation language.

RESPONSE SUB 1-10

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding the role of existing regulations in addressing impacts.

RESPONSE SUB 1-11

Sources are provided for all graphics and tables included in the 2024 PEIR; revisions or updates to source citations in the 2024 PEIR are provided in Chapter 9, Section 9.4, and in Appendix I.

RESPONSE SUB 1-12

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above. This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

RESPONSE SUB 1-13

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

RESPONSE SUB 1-14

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, and **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above.

RESPONSE SUB 1-15

All headers, footers, maps, and PEIR references in the 2024 PEIR refer to the "2024 PEIR" or "Connect SoCal 2024 PEIR"; as such, no changes to the 2024 PEIR are warranted.

RESPONSE SUB 1-16

The comment does not address the analysis of the 2024 PEIR, nor does it specify any source citations for tables, figures, charts, maps or narrative text in the 2024 PEIR requiring updates. If any updated citations are warranted, updated source text for citations in affected 2024 PEIR maps, tables, and section text is provided in Chapter 9, Section 9.4, and Appendix I.

RESPONSE SUB 1-17

All references to Connect SoCal 2024 in the 2024 PEIR refer to "the Plan" or "Connect SoCal 2024"; as such, no changes to the 2024 PEIR are warranted.

RESPONSE SUB 1-18

All data sources cited in the 2024 PEIR are provided where appropriate in the document. Any text modifications to data source citations that are warranted are included among the text revisions in Chapter 9, Section 9.4.

RESPONSE SUB 1-19

The comment does not address the analysis of the 2024 PEIR, nor does it indicate any specific definitions requiring source citation updates; any updates to definition source text is included in Chapter 9, Section 9.4.

RESPONSE SUB 1-20

At the regional scale, the 2024 PEIR identifies impacts to public services and utilities (Section 3.15, *Public Services*, and Section 3.19, *Utilities and Service Systems*) as significant based on increased demand for facilities. Refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, above, regarding the level of detail presented in the 2024 PEIR. The Plan is a regional-scale planning document and as such local-level planning infrastructure capacity needs are not addressed, and likewise this level of detail is not presented in the various analyses in the 2024 PEIR, including those regarding infrastructure capacity. Furthermore, as discussed in Section 3.14, *Population and Housing*, and Chapter 5, *Other CEQA Considerations*, the Plan does not induce growth;

rather, it provides a coordinated strategy for managing land use patterns and transportation improvements to accommodate projected population growth. Refer to **Response ORG 5-14**.

RESPONSE SUB 1-21

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above, regarding planning strategies and assumptions utilized in the Plan, including assumptions regarding the feasibility of potential growth within local jurisdictions' Spheres of Influence.

RESPONSE SUB 1-22

Where appropriate throughout the 2024 PEIR, table notes acknowledge that numbers may not total properly due to rounding. However, in response to this comment, additional notes stating "Numbers may not sum to total due to rounding" are added to the 2024 PEIR, starting in Table 3.8-3 on page 3.8-9 in Section 3.8, *Greenhouse Gas Emissions*, and such changes are shown in Chapter 9, Section 9.4; refer also to Appendix I for updated modeling resulting from the Final Plan.

RESPONSE SUB 1-23

Refer to **Response SUB 1-3**, above.

RESPONSE SUB 1-24

Refer to page 3.2-1 of the 2024 PEIR for a discussion of how farmland is defined and designated. Land use for farmland designation within the SCAG region was sourced from the Department of Conservation Farmland Mapping and Monitoring Program (FMMP) from year 2018, which represents the most currently available data year as of the publication of the 2024 PEIR. FMMP farmland designation is therefore not necessarily reflective of the most current zoning codes or General Plan land use designations for local jurisdictions in the SCAG region. Refer to Chapter 9, Section 9.4, for clarifying text that is added to the notes in Table 3.2-1, Table 3.2-2, and Table 3.2-3 on pages 3.2-3 and 3.2-4. No updates to calculations or farmland designation in the tables are required.

RESPONSE SUB 1-25

References to American Communities Survey data are updated in the 2024 PEIR as suggested; text revisions resulting from this change are shown in Chapter 9, Section 9.4, changes for page 2-18.

RESPONSE SUB 1-26

References to the "State of California" and "County of XXX" (i.e., capitalization of "State" and "County") are updated as a global change in the 2024 PEIR as suggested. The first instance of this correction is shown on page ES-4 in Chapter 9, Section 9.4.

RESPONSE SUB 1-27

Terms that appear in the 2024 PEIR are updated to the 2024 PEIR glossary as suggested; text revisions resulting from this change are shown in Chapter 9, Section 9.4. Terms noted by the commenter that do not appear in the 2024 PEIR or appendices are not added to the glossary.

RESPONSE SUB 1-28

The comment does not raise a substantive issue regarding the 2024 PEIR or the analysis contained therein. Nonetheless, first-person references such as “our” and “we” are removed as appropriate as a global change from text of the 2024 PEIR. The first instance of this correction is shown on page ES-4 in Chapter 9, Section 9.4. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE SUB 1-29

Section 3.8, *Greenhouse Gas Emissions*, specifically and the 2024 PEIR generally describes the SCAG GHG emission reduction target being a reduction of 19 percent by 2035 in GHG per capita emissions from light-duty passenger vehicles as compared to 2005 throughout the section. To clarify this for all references in the 2024 PEIR to GHG reduction targets pursuant to SB 375, the text is modified to indicate that the target is a per capita reduction target as a global change. Refer to Chapter 9, Section 9.4, for text changes to page ES-7 and globally throughout the 2024 PEIR.

RESPONSE SUB 1-30

Section 3.8, *Greenhouse Gas Emissions*, includes citations to the regulatory framework that governs greenhouse gas emissions, and to document sources of information relevant to evaluate the significance of the potential impacts related to greenhouse gas emissions that could result from development of Connect SoCal 2024. The citations included in Section 3.8, *Greenhouse Gas Emissions*, were reviewed and are the most updated, applicable and current versions of the citations. These sources are appropriate irrespective of the 2019 base year utilized in the analysis. However, as discussed in Section 1.3, *Baseline for Determining Significance and Thresholds of Significance*, in Chapter 1, *Introduction*, of the 2024 PEIR, baseline conditions vary by environmental topic, with some issues most appropriately relying on 2019 data for consistency and comparative purposes and other issues relying on more recent data. In the case of Greenhouse Gas Emissions, the cited sources would be referenced in the analysis even if a more recent baseline year were utilized for the analysis, as these are the most recent appropriate sources for the content referenced in the analysis. Therefore, no citation updates are warranted.

RESPONSE SUB 1-31

This comment is a duplicate of Comment SUB 1-27. Refer to **Response SUB 1-29**.

RESPONSE SUB 1-32

The comment does not specify any maps, reports, or documents in the 2024 PEIR requiring the suggested revisions. However, all 2024 PEIR documents and maps include the SCAG logo and/or contain text indicating they are part of the 2024 PEIR document (title blocks for maps and headers/footers for PEIR section documents and technical reports).

RESPONSE SUB 1-33

The commenter’s opinion regarding the tables and figures is acknowledged but this comment does not raise a substantive issue regarding analysis presented in the Draft 2024 PEIR. No further response is necessary. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE SUB 1-34

This comment is a duplicate of Comment SUB 1-22; please refer to **Response SUB 1-22** above.

RESPONSE SUB 1-35

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the third bullet on page ES-4 and page 2-8.

RESPONSE SUB 1-36

The cited text is correct as is. Express bus lane miles are called out separately from other bus routes, and thus this number is not included in the total mileage of bus routes also cited by the commenter. No text changes are necessary.

RESPONSE SUB 1-37

The usage of “households” and “housing units” is clarified in the text to indicate that they are related terms but do not have the same meaning. Refer to Chapter 9, Section 9.4, for the resulting text revisions to the first full paragraph on page ES-5.

RESPONSE SUB 1-38

Refer to Chapter 9, Section 9.4, for the requested text revisions to page ES-6.

RESPONSE SUB 1-39

The date of October 2024 is revised to February 2025; changes are reflected in the text of the Executive Summary on page ES-7 and globally throughout the 2024 PEIR. A related text edit is made on page 3.14-16 in the Population and Housing section of the 2024 PEIR, both of which are included in Chapter 9, Section 9.4.

RESPONSE SUB 1-40

The section of the 2024 PEIR being referenced is the Executive Summary, which with limited exceptions, is intended to function as a stand-alone chapter. Despite including references to two tables in Chapter 2, *Project Description*, the Executive Summary includes its own set of tables and maps relevant to the content presented in the chapter. As such, specific cross-references to tables and data values is not necessary in this context and thus the suggested cross-reference to Table 2-5 is not made. The term “transit” in the context of this discussion does include both bus and rail transit but not passenger rail. With regard to the cited Transit O&M costs, this value was rounded for the purposes of summary discussion in the 2024 PEIR and is considered a representative estimate. No change is made to the text on page ES-11.

RESPONSE SUB 1-41

The No Project Alternative includes implementation of the first year of transportation programming. Refer to Chapter 9, Section 9.4, for the related text revisions on page ES-12.

RESPONSE SUB 1-42

The cited table reference error is corrected. Refer to Chapter 9, Section 9.4, for the resulting text revisions on page ES-13.

RESPONSE SUB 1-43

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding the incorporation of qualifying language in mitigation measures. As noted therein, all SCAG Mitigation Measures and Project-level Mitigation Measures contained in the 2024 PEIR are provided for consideration by local jurisdictions as part of future environmental review for individual projects. As such, the suggested text edits are not necessary and thus are not being applied to the 2024 PEIR.

RESPONSE SUB 1-44

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding the incorporation of qualifying language in mitigation measures. Modifying language similar to that suggested by the commenter is already provided in for project-level mitigation measures in the 2024 PEIR, as appropriate and in the context of each mitigation measure.

RESPONSE SUB 1-45

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding references to other agencies' policies, procedures, and best management practices in mitigation measures. It is the responsibility of each lead agency under CEQA to conduct the appropriate level of environmental review for each individual project, including consideration of applicable and appropriate mitigation measures and associated requirements. The level of detail provided in such mitigation language is at the sole discretion of the lead agency.

RESPONSE SUB 1-46

Refer to **Master Response No. 5, Mitigation Measures**, above. The intent of PMM-AES-1c is to balance the visual effect of new landscaping with the existing visual character of the surrounding area with regard to vegetation and landscaping. The mitigation measure does not consider drought tolerance of landscape plant materials but rather it appropriately addresses only the visual aspects of the landscaping relative to the existing landscaping character and other visual conditions. It is the responsibility of local lead agencies to determine the specific landscaping requirements and associated mitigation measures for a given project, and such measures may also include limitations for specific species or drought-tolerant characteristics. In addition, PMM-UTIL-2 in Section 3.19, *Utilities and Service Systems*, of the 2024 PEIR identifies that a Lead Agency can and should consider as appropriate and feasible mitigation measures to ensure sufficient water supplies, which may include shifting to drought-tolerant native landscape plantings and promoting the availability of drought-resistant landscaping options. Refer to page 3.19-46 of the 2024 PEIR for further information.

RESPONSE SUB 1-47

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding the use of “applicable and feasible” in the mitigation language. Additionally, as noted in **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, above, Connect SoCal 2024 is a regional-scale planning document and as such local-level planning factors are not addressed. SCAG recognizes that PMM-AES-2 may not apply to residential ministerial or by-right projects.

RESPONSE SUB 1-48

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding mitigation language. The requested text changes to SMM-AG-3 do not change the intent or facilitate the effectiveness or implementation of this measure. Use of the Greenprint tool is entirely voluntary and will be consistent with the adopted SoCal Greenprint Data Standards. For additional information, please see SCAG staff report to the Regional Council on February 1, 2024, available at: <https://scag.ca.gov/sites/main/files/file-attachments/rc020124fullpacket.pdf>. As such, the suggested text modifications are not made in the 2024 PEIR.

RESPONSE SUB 1-49

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding the use of “applicable and feasible” in the mitigation language. Additionally, as noted in **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, above, Connect SoCal 2024 is a regional-scale planning document and as such local-level planning factors are not addressed. As caveated in PMM-AQ-1, the provided list of project-level mitigation measures to reduce substantial project-level adverse effects related to violating air quality standards is not exhaustive, and lead agencies may develop other comparable mitigation measures based on applicability and feasibility for a given individual project. Therefore, the requested revisions to PMM-AQ-1 are not warranted and no changes are made.

RESPONSE SUB 1-50

As described in both Mitigation Measure PMM-AQ-1 (y), the measure refers to the air filtration unit reduction efficiencies where it states, “Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high-efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better.” MERV 13 Filters have been shown to be effective air filters where the American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) 52.5 standard provides removal efficiencies for mechanical filtration. According to the ASHRAE 52.2 standard, MERV 13 filters have reduction efficiencies of 50, 85, and 90 percent for particles with diameter ranges of 0.3 to 1.0 µm, 1.0 to 3.0 µm, and 3.0 to 10.0 µm, respectively.¹³ The language within PMM-AQ-1(z) regarding developing a process for evaluating the effectiveness of the enhanced filtration units is identified as an option for lead agencies to develop additional evaluation systems to ensure that the enhanced filtration units are performing to the MERV 13 or better reduction efficiencies as appropriate and feasible. Therefore, the requested revisions to PMM-AQ-1 (z) are not warranted and no changes are made.

¹³ National Air Filtration Association, Understanding MERV, <https://www.nafahq.org/understanding-merv-nafa-users-guide-to-ansi-ashrae-52-2/>, updated October 2018, accessed January 31, 2024.

RESPONSE SUB 1-51

Refer to **Master Response No. 5, Mitigation Measures**, above, regarding compliance with existing regulations in mitigation measures. To achieve the air quality emission reduction benefits associated with Mitigation Measure PMM-AQ-1(cc), exceedance of the Title-24 Building Code Envelope Energy Efficiency Standards (California Building Standards Code) is required since complying with the California Building Standards Code would not be considered mitigation as it is a regulatory requirement. Therefore, the requested revisions to PMM-AQ-1 (cc) are not warranted and no changes are made.

RESPONSE SUB 1-52

Refer to Chapter 9, Section 9.4, for text modification to PMM-AQ-1(ee).

RESPONSE SUB 1-53

This comment is a duplicate of Comment SUB 1-52. Refer to **Response SUB 1-52**.

RESPONSE SUB 1-54

Refer to Chapter 9, Section 9.4, for text modification to PMM-AQ-2.

RESPONSE SUB 1-55

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-56

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-57

Refer to Chapter 9, Section 9.4, for text modifications to PMM-BIO-3 on page ES-34.

RESPONSE SUB 1-58

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-59

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-60

PMM-BIO-4(p) is updated to add clarity to the use of "other open space or nursery site areas." The use of "other" is referring to those that have not been designated as such by a general plan or agency. The use of "nursery site areas" is referring to wildlife nursery sites instead of plant nursery sites. Refer to Chapter 9, Section 9.4, for text modifications to PMM-BIO-4(p) on page ES-37.

RESPONSE SUB 1-61

Refer to Chapter 9, Section 9.4, for text modifications to PMM-BIO-4(v) on page ES-38.

RESPONSE SUB 1-62

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-63

Refer to Chapter 9, Section 9.4, for text modifications to PMM-BIO-5(h) on page ES-39.

RESPONSE SUB 1-64

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-65

Refer to Chapter 9, Section 9.4, for text modifications to PMM-GHG-1(a)(ix), 1(j)iv and (l) on pages ES-47 through ES-50.

RESPONSE SUB 1-66

The intent of SMM-LU-1 is to encourage coordination between SCAG, Caltrans, County Transportation Commissions, and other local jurisdictions regarding transportation-related projects and other improvements. However, to the extent that non-transportation-related projects could have the potential to affect nearby facilities under the jurisdiction of Caltrans, CTC, or other local jurisdiction, coordination among agencies might still be required where SCAG could facilitate and support. SCAG is not responsible for siting new facilities. No changes to this mitigation are warranted. Also refer to **Response SUB 1-156** below.

RESPONSE SUB 1-67

Refer to Chapter 9, Section 9.4, for the resulting text revisions to PMM-HYD-4 on pages ES-59 and ES-60.

RESPONSE SUB 1-68

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-69

Mitigation measure PMM-POP-1 applies to both existing housing and businesses, since displacement can occur directly through physical removal of housing stock or indirectly through removal of businesses and associated employment positions that can lead to displacement of people who may need to relocate to secure employment elsewhere. Because the impacts relate to the need for replacement housing as a result of displacement of people or housing (either directly or indirectly), no revisions are necessary.

RESPONSE SUB 1-70

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-71

The cited document, *Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012)*, is the latest version of this reference available from the Federal Highway Administration. Therefore, this document is an appropriate reference document for the discussion presented in the 2024 PEIR. Furthermore, as discussed in **Master Response No. 5, Mitigation Measures**, above, each lead agency must determine the specific details regarding mitigation measures to be employed to address impacts associated with transportation and urban land use projects within their jurisdictions. As such, lead agencies must determine whether or not the cited reference document is relevant and appropriate for inclusion in transportation mitigation language.

RESPONSE SUB 1-72

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-73

Refer to Chapter 9, Section 9.4, for the resulting text revisions to PMM-UTIL-2 on page ES-73.

RESPONSE SUB 1-74

Refer to **Master Response No. 5 Mitigation Measures**, above. The 2024 PEIR discusses SB 1383 on page 3.19-33 as part of the Regulatory Framework for Utilities and Service Systems. SB 1383 is incorporated into the assumptions of operational solid waste activities. PMM-UTIL-3 focuses on developing opportunities to divert food waste from landfills that are in addition to activities in compliance with SB 1383. Therefore, the requested revisions to PMM-UTIL-3 are not warranted and no changes are made.

RESPONSE SUB 1-75

Refer to Chapter 9, Section 9.4, for the resulting map revisions to Map ES-1. The resulting map revisions are also applied to Map 2-1 in Chapter 2, *Project Description*, of the 2024 PEIR.

RESPONSE SUB 1-76

There are 15 Subregional Organizations (“subregional entities”) in the SCAG region (<https://scag.ca.gov/subregional-organizations-scag-region/subregional-organizations-scag-region>); however, as shown in Map ES-2, a portion of central Riverside County is located outside the 15 designated subregions. As such, while there are 15 designated subregions in the SCAG region, there are 16 distinct areas correctly depicted in Map ES-2. Refer to Chapter 9, Section 9.4, for the resulting map revisions to Map ES-2. The resulting map revisions are also applied to Map 2-2 in Chapter 2, *Project Description*, of the 2024 PEIR.

RESPONSE SUB 1-77

Refer to **Response SUB 1-76**, above; also refer to Chapter 9, Section 9.4, for the resulting map revisions to Map ES-2. The resulting map revisions are also applied to Map 2-2 in Chapter 2, *Project Description*, of the 2024 PEIR.

RESPONSE SUB 1-78

Map ES-3 in the 2024 PEIR reproduces a Plan map. Maps in the 2024 PEIR (and Plan) are based on underlying information including but not limited to the Growth Forecast, Project List, and/or other GIS resource data. The analyses in the PEIR are based on the underlying data not the maps. The requested revisions would not substantially affect the 2024 PEIR analyses or conclusions. No changes are made to this map in the 2024 PEIR. However, the related Plan map is updated as part of the Final Plan. Refer to Appendix J for updated maps.

RESPONSE SUB 1-79

Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map ES-4.

RESPONSE SUB 1-80

Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map ES-5.

RESPONSE SUB 1-81

Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map ES-6.

RESPONSE SUB 1-82

Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map ES-7.

RESPONSE SUB 1-83

Minor editorial changes are not presented in underline or strikethrough mode in Chapter 9; however, these edits are acknowledged and have been recorded for future reference and use.

RESPONSE SUB 1-84

The text indicated by the commenter is not missing necessary reference information, as the “[...]” indicates that the quoted text is truncated to focus on the operative language. As such, no text modifications or updated references are required.

RESPONSE SUB 1-85

Refer to **Response SUB 1-44**, above.

RESPONSE SUB 1-86

Refer to **Response SUB 1-83**.

RESPONSE SUB 1-87

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE SUB 1-88

Refer to **Response SUB 1-39**, above.

RESPONSE SUB 1-89

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 2-7.

RESPONSE SUB 1-90

Refer to **Response SUB 1-35**, above.

RESPONSE SUB 1-91

Per the Plan's Mobility Technical Report, the region has 109 miles of local heavy and light rail facilities. Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 2-8 as well as other numerical updates to the information presented.

RESPONSE SUB 1-92

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 2-9, first full paragraph.

RESPONSE SUB 1-93

The term "this standard" refers to state and national standard for vegetation mapping; more specifically, this includes the Survey of California Vegetation Classification and Mapping Standards and United States National Vegetation Classification Standards.

RESPONSE SUB 1-94

As noted in the comment on page 2-9 in Chapter 2, *Project Description*, "data from CDFW and USFWS" were the source of the cited statistics; this information was updated from the 2020 RTP/SCS PEIR, which was based on information provided in the Biological Resources Technical Report prepared for that document (https://scag.ca.gov/sites/main/files/file-attachments/dpeir_connectsocial_appendix03_4_biologicalresources.pdf?1606004031). Refer to Chapter 9, Section 9.4, for related text revisions on page 2-9, third paragraph.

RESPONSE SUB 1-95

Refer to **Response SUB 1-39**, above.

RESPONSE SUB 1-96

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 2-13.

RESPONSE SUB 1-97

The conditional language “if fully realized” in this context means if the compact development pattern envisioned by the Plan is implemented to its fullest extent over the Plan horizon through 2050.

RESPONSE SUB 1-98

TPAs are areas in proximity to transit that are generally well-served by existing infrastructure including utilities and goods and services. Therefore, encouraging infill development in these areas can lead to efficient use of utility infrastructure (reducing the need to add new infrastructure in other areas) and can lead to a more connected community with goods and services already located there able to serve more people.

RESPONSE SUB 1-99

The Plan’s Regional Planning Policies presented in Table 2-2 in Chapter 2, *Project Description*, of the 2024 Draft PEIR were updated between the Draft and Final Plan. The revised Regional Plan Policies are presented in Chapter 3, Section 3.3, *Regional Planning Policies*, of the Final Plan and are not substantially different from the Regional Plan Policies evaluated in the Draft PEIR. Refer to Chapter 9, Section 9.3.1, *Category 1-F* section, for a summary of the changes. As discussed in Section 9.3.5 (and documented in updated modeling results in Appendix I), none of these refinements results in substantial changes to the information, analysis, and conclusions presented in the Draft PEIR.

RESPONSE SUB 1-100

Refer to **Response SUB 1-75** regarding revisions to Map ES-1 and Map 2-1.

RESPONSE SUB 1-101

Refer to **Response SUB 1-76** regarding revisions to Map ES-2 and Map 2-2.

RESPONSE SUB 1-102

Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map 2-3. Refer to Appendix J for more information. Also refer to Plan **Submission ID 0001761.02.1** regarding available online map resources showing additional map details as requested by the commenter.

RESPONSE SUB 1-103

Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map 2-4. Refer to Appendix J for more information.

RESPONSE SUB 1-104

The referenced map is updated to depict the location of all commercial service airports and reliever airports in the SCAG region consistent with Map 1, *SCAG Region Commercial Service and Select Reliever Airports*, from the Plan's Aviation and Ground Access Technical Report. Refer to Chapter 9, Section 9.4, for the resulting map revised Map 2-6.

RESPONSE SUB 1-105

Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map 2-7.

RESPONSE SUB 1-106

Refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above, regarding TAZ-level data and the regional growth pattern presented in Plan maps. Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Map 2-8.

RESPONSE SUB 1-107

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above. Refer to **Response SUB 1-78** regarding revisions to Plan-based maps including Maps 2-9 through 2-12.

RESPONSE SUB 1-108

Refer to Chapter 9, Section 9.4, for the resulting text revisions to page 2-47.

RESPONSE SUB 1-109

Refer to **Response SUB 1-83**, above, regarding non-substantive editorial text changes.

RESPONSE SUB 1-110

The requested text modifications are made on page 3-5, including removal of the reference to "other stakeholders" in the affected language. Refer to Chapter 9, Section 9.4, for the resulting text revisions to the footnote on page 3-5.

RESPONSE SUB 1-111

The Safeguarding California Plan is intended to be updated every three years; however, the 2018 Plan is the latest iteration and, therefore was included in Section 3.8, *Greenhouse Gas Emissions*.

RESPONSE SUB 1-112

Refer to Chapter 9, Section 9.4, for text modifications to the discussion on page 3.8-10 within the greenhouse gas emissions section of the 2024 PEIR. The text explains that Imperial County is not included in the 2011 FFCO₂ estimates. However, as shown in Table 3.8-10, Imperial County is represented and makes up approximately 1.9 percent of the regional total transportation GHG emissions. This text is updated from 1.7 percent to 1.9 percent

to reflect the values for Imperial County presented in Table 3.8-10 in Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR.

RESPONSE SUB 1-113

Refer to Section 3.8.4, page 3.8-76, which identifies the source and provides additional information on Orange County's climate action planning process and associated stakeholders.

RESPONSE SUB 1-114

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE SUB 1-115

The term "OGV" is added to Chapter 7, *Glossary*, of the 2024 PEIR, and text changes can be found in Chapter 9, Section 9.4.

RESPONSE SUB 1-116

Refer to Chapter 9, Section 9.4, for text modifications to the discussion on page 3.8-63.

RESPONSE SUB 1-117

Refer to Chapter 9, Section 9.4, for text modifications to the discussion on pages 3.8-66 through 3.8-68.

RESPONSE SUB 1-118

Recreation areas include public and private areas. Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-2.

RESPONSE SUB 1-119

Refer to **Response SUB 1-76**.

RESPONSE SUB 1-120

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above. "Vacant land" as referred to in the 2024 PEIR includes undeveloped land lacking any improvements such as parking lots, surface paving, or other improvements. No text changes are warranted.

RESPONSE SUB 1-121

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-5, first paragraph.

RESPONSE SUB 1-122

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-5, sixth paragraph.

RESPONSE SUB 1-123

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-6 regarding San Bernardino County. Note that “SCAG region” was revised to “SCAG regional” also in each of the four bullets in this section.

RESPONSE SUB 1-124

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-6 regarding Ventura County.

RESPONSE SUB 1-125

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-8, second paragraph.

RESPONSE SUB 1-126

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-8, paragraphs 3 and 4.

RESPONSE SUB 1-127

As indicated in the comment, Connect SoCal 2024 would result in the addition of approximately 50,000 urbanized acres to the region by 2050, which would occur through changes in land uses as areas develop. The suggested text modification is not made in the 2024 PEIR.

RESPONSE SUB 1-128

The text on page 3.11-8 is modified to correct the number of land use categories and also to clarify that the 34 land use categories are grouped into the three Land Development Categories (LDCs) as part of a subsequent process. Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-8 under Existing Land Uses by County.

RESPONSE SUB 1-129

The terms “medium density” and “high-density” in this context refer to the general concentration of housing and not a specific numerical threshold for density, which local jurisdictions may define within their individual municipal codes.

RESPONSE SUB 1-130

Multi-family units are used as a generic category to refer to all homes other than single-family detached homes. Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-11, third paragraph.

RESPONSE SUB 1-131

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-11, fifth paragraph.

RESPONSE SUB 1-132

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-11, eighth paragraph.

RESPONSE SUB 1-133

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.11-12, first and third paragraphs. The symbols have also been replaced with text in three other places in Section 3.11, *Land Use and Planning*, of the 2024 PEIR.

RESPONSE SUB 1-134

Refer to **Response SUB 1-24**, above. Because Connect SoCal is a regional planning document, which is based on land use plans and growth data provided by local jurisdictions, the land use model utilized in the Plan, the results of which are also incorporated into the analysis presented in the 2024 PEIR, only recognizes land uses designated in adopted plans and cannot incorporate the current activities occurring on any given parcel. As such, irrespective of any incidental agricultural operations or other temporary activities on land designated for other uses, the land uses assumed in the Plan are those that are identified by local jurisdictions in their respective long-range planning policy documents and related data. No changes to the text of the 2024 PEIR are made.

RESPONSE SUB 1-135

The acronym used in the source for Table 3.11-4 is revised to spell out California Coastal Commission, as shown in Chapter 9, Section 9.4. The website has not been added to the source in the table since it is provided in Section 3.11.4, *Sources*.

RESPONSE SUB 1-136

The acronyms, CCC and CDP, are defined on page 3.11-16 and therefore are not spelled out on page 3.11-21 in the fourth paragraph.

RESPONSE SUB 1-137

Refer to Chapter 9, Section 9.4, for the resulting text revisions to page 3.11-21, first paragraph.

RESPONSE SUB 1-138

As indicated in the 2024 PEIR, SB 375 synchronizes the schedules of the RHNA and regional transportation plan processes. The RHNA is developed concurrent with the regional transportation plan every 8 years. Refer to Chapter 9, Section 9.4, for the resulting text revisions to page 3.11-24, second paragraph.

RESPONSE SUB 1-139

Refer to Chapter 9, Section 9.4, for the resulting text revisions to page 3.11-24, second paragraph. The suggested addition of the last sentence was not included as it does not add to the analysis.

RESPONSE SUB 1-140

Refer to **Response SUB 1-66**, above. Additionally, the mitigation measure as presented does not limit the ability of local jurisdictions to coordinate with other agencies, as appropriate for a given project or program, including the Transportation Corridor Agencies, and thus there is no need to specify this agency in the mitigation language. No changes are made to the 2024 PEIR.

RESPONSE SUB 1-141

The maps in the 2024 PEIR do not include page numbers on the actual maps, but the table of contents does identify the page number and maps are easily found based in the table of contents or immediately following their reference in the text. This comment does not raise a substantive issue regarding the 2024 PEIR or the analysis contained therein. Therefore, the requested revision to add page numbers to all maps is not warranted. Nonetheless, page numbers are added for any maps that are republished as part of Chapter 9 for other corrections.

The source year on Map 3.11-1 should be 2019. With that revision, it is not necessary to change the title of the figure to include the year. The land use definitions are available from the SCAG website (<https://gisdata-scag.opendata.arcgis.com/maps/3b27b21e9aa64e4a8200d0385ccfe3ac/about>). As indicated on page 3.11-8 in the discussion regarding County and City General Plans, where Map 3.11-1 is cited, the land use designations are consolidated for purposes of consistency and mapping. Refer to Chapter 9 for the resulting revisions to Map 3.11-1.

RESPONSE SUB 1-142

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the first bullet on page 3.14-1.

RESPONSE SUB 1-143

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the fifth bullet on page 3.14-1.

RESPONSE SUB 1-144

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the sixth bullet on page 3.14-1.

RESPONSE SUB 1-145

Refer to Chapter 9, Section 9.4, for the resulting text revisions to page 3.14-2, second paragraph.

RESPONSE SUB 1-146

Refer to Chapter 9, Section 9.4, for the resulting text revisions to page 3.14-2, third paragraph.

RESPONSE SUB 1-147

Refer to Chapter 9, Section 9.4, for the resulting text revisions to Table 3.14-1 on page 3.14-2.

RESPONSE SUB 1-148

Refer to Chapter 9, Section 9.4, for the resulting text revisions to page 3.14-3, second paragraph.

RESPONSE SUB 1-149

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the source citation in Table 3.14-3 on page 3.14-4.

RESPONSE SUB 1-150

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the source citation in Table 3.14-4 on page 3.14-4. The numbers presented in Table 3.14-4 are raw rates based on total population by county and for the total region; however, per the commenter's request, the rates have been converted to percentages for clarity.

RESPONSE SUB 1-151

The values contained in Tables 3.14-8, 3.14-9, and 3.14-10 are taken directly from the Plan's Demographics and Growth Forecast Technical Report. As such, the projections provided in these tables are consistent with the corresponding data values utilized in the Plan.

RESPONSE SUB 1-152

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.14-11, third paragraph.

RESPONSE SUB 1-153

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.14-12, second paragraph.

RESPONSE SUB 1-154

Refer to **Response SUB 1-39**, above.

RESPONSE SUB 1-155

The requested text edits are applied to the Table reference and Table headers; however, the addition of "County of" before each county name in the left column is not made since the header already indicates "County" such that the text addition would be redundant. Refer to Chapter 9, Section 9.4, for the resulting text revisions to Table 3.14-11 on pages 3.14-16 through 3.14-18.

RESPONSE SUB 1-156

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.14-22, second paragraph.

RESPONSE SUB 1-157

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.14-22, fourth paragraph.

RESPONSE SUB 1-158

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.14-22, seventh paragraph.

RESPONSE SUB 1-159

Refer to Chapter 9, Section 9.4, for the resulting text revisions to SMM-POP-1 on page 3.14-23.

RESPONSE SUB 1-160

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 3.14-24, last paragraph.

RESPONSE SUB 1-161

Refer to Response SUB 1-141, above. No changes to Map 3.14-1 are made.

RESPONSE SUB 1-162

Refer to Chapter 9 and Appendix J for the resulting map revisions to Map 3.14-2.

RESPONSE SUB 1-163

Refer to Chapter 9 and Appendix J for the resulting map revisions to Map 3.14-3.

RESPONSE SUB 1-164

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 4-5, first paragraph.

RESPONSE SUB 1-165

Refer to **Response SUB 1-83**, above, regarding non-substantive editorial text changes.

RESPONSE SUB 1-166

SCAG's definition of work-from-home applies to total workers for the population ages 16 and over from the U.S. Census employment status and does not distinguish between part-time and full-time employees. The activities-based, travel demand model assumes 23.3% work-from-home employment in the region in 2035.

RESPONSE SUB 1-167

Refer to **Response SUB 1-41**, above. No change is made to the text on page 4-9 as this reference is correct.

RESPONSE SUB 1-168

The analysis of aesthetics impacts regarding near-term transportation projects under the No Project Alternative did include a review of those projects planned for the first year of transportation programming. No projects were located in proximity to state scenic highways or vista points, as reflected in the analysis presented in Chapter 4, *Alternatives*, of the 2024 PEIR.

RESPONSE SUB 1-169

As discussed on page 4-12 in Chapter 4, *Alternatives*, the projected land use pattern of the No Project Alternative would be more dispersed than the Plan. Also refer to **Response ORG 5-2**, below, regarding agricultural land loss estimates and SPM data.

RESPONSE SUB 1-170

The value “1,400” noted in the referenced text refers to vehicle miles traveled (VMT). The segment would experience a decrease in VMT from light- and medium-duty cars of approximately 1,400 VMT as compared to the No Project. Refer to Chapter 9, Section 9.4, for the resulting text revisions.

RESPONSE SUB 1-171

In Chapter 4, *Alternatives*, of the 2024 PEIR, the term “No Project Alternative” is interchangeably referred to as the “No Plan Alternative.” The usage of “the Plan” and “Connect SoCal 2024” to refer to the SCAG 2024 RTP/SCS is consistent with the Plan style guide and defined terms carried through all Plan documents. No text changes regarding the use of these terms in the 2024 PEIR are made but the comments are acknowledged and noted for future reference.

RESPONSE SUB 1-172

SCAG Natural Lands Conservation Areas are areas in the region that are prioritized for conservation due to habitat value or other factors. More specifically, these areas include wetlands, habitat connectivity areas, areas with high species richness, active farmland, and natural areas.

RESPONSE SUB 1-173

The cited language is verbatim from the CEQA Guidelines Appendix G checklist question for this issue. As such, this language is not modified as suggested.

RESPONSE SUB 1-174

The term “seiche” does not appear on page 4-21 in the 2024 PEIR; a brief definition is added to the text on page 4-23. Refer to Chapter 9, Section 9.4, for the resulting text revisions.

RESPONSE SUB 1-175

A public-use airport is (1) a public airport or (2) a privately-owned airport used or intended to be used for public purposes. A public airport is a type of public use airport.

RESPONSE SUB 1-176

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the footnote on page 4-22.

RESPONSE SUB 1-177

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 4-22, last paragraph.

RESPONSE SUB 1-178

The list of programmed transportation projects under the No Project Alternative would include a substantially lower number of transportation projects than under the Plan, and thus it would be expected that the reduced footprint of the limited programming would translate to reductions in potential for physical displacement of existing uses including housing. While the list of near-term projects was considered in the analysis, the relative volume of transportation projects to be undertaken under the Plan and No Project Alternative scenarios is the key determinant of the level of impacts associated with future transportation projects.

RESPONSE SUB 1-179

Refer to Chapter 9, Section 9.4, for the resulting text revisions on page 4-25, last paragraph.

RESPONSE SUB 1-180

The projects implemented under the No Project Alternative would be designed to address applicable design safety requirements, but with fewer new projects meeting current standards being implemented under this alternative, it would not achieve the safety goals of the Plan to the extent that the Plan itself would. Refer to Chapter 9, Section 9.4, for the resulting text revisions.

RESPONSE SUB 1-181

Refer to **Response SUB 1-24** for a discussion of updates to Tables 3.2-1, 3.2-2, and 3.2-3.

RESPONSE SUB 1-182

Refer to **Response SUB 1-173**, above, regarding CEQA Checklist threshold language. The use of the term “less” describing relative impacts in the 2024 PEIR is a CEQA term to indicate the degree of impact of the alternative when compared to that of the Plan. As such, the use of the term “fewer” to describe impacts is not accurate, and the issue is not the number of impacts but rather the degree of significance, which in this case is “less” than that of the Plan. No text changes are made in the 2024 PEIR.

RESPONSE SUB 1-183

The numerical comparisons for the land use scenarios evaluated in Chapter 4 of the 2024 PEIR that are provided in the Connect SoCal 2024 Land Use and Communities Technical Report only evaluate the performance of existing (2019), Trend/Baseline (No Project Alternative), and the Plan. As such, the comparison cited in the text noted by the commenter accurately states that the comparison is between the Plan and the No Project Alternative, as no other alternatives or scenarios were included for comparison. While this comment does not warrant a text change, other editorial corrections are applied as shown in Chapter 9, Section 9.4.

RESPONSE SUB 1-184

The cited text should indicate the South Coast Air Quality Management District (SCAQMD) and Priority Development Areas (PDAs) on the respective pages as suggested. Refer to Chapter 9, Section 9.4, for the resulting text revisions.

RESPONSE SUB 1-185

Refer to **Response SUB 1-24** for a discussion of the FMMP and its relation to local zoning and General Plan land use distinctions.

RESPONSE SUB 1-186

Refer to **Response SUB 1-173**, above, regarding CEQA Checklist threshold language. This language will not be modified as suggested.

RESPONSE SUB 1-187

Refer to Chapter 9, Section 9.4, for text modifications to Chapter 5, *Other CEQA Considerations*, page 5-4.

RESPONSE SUB 1-188

Fuel oil is a petroleum fuel product similar to diesel fuel that is distilled from crude oil. Heating oil is produced mainly for use in boilers and furnaces (for space heating) and in water heaters. This sentence is revised to clarify the types of fossil fuels typically involved in construction of transportation projects. Refer to Chapter 9, Section 9.4, for related text revisions on page 5-8.

RESPONSE SUB 1-189

Refer to Refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above. This sentence is revised to clarify the balance of growth represented by the Plan. Refer to Chapter 9, Section 9.4, for text modifications to Chapter 5, *Other CEQA Considerations*, page 5-10.

RESPONSE SUB 1-190

Refer to Chapter 9, Section 9.4, for text modification to PEIR Chapter 5, *Other CEQA Considerations*, page 5-11.

8.6.9 LETTER TRANS 1: ORANGE COUNTY TRANSPORTATION AUTHORITY

Dan Phu, Manager, Environmental Programs
Orange County Transportation Authority
550 South Main Street
P.O. Box 14184
Orange, California 92863-1584

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001733** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE TRANS 1-1

The requested simplification of the language SMM-AG-3 does not change the intent or facilitate the effectiveness or implementation of this measure. SMM-AG-3 already provide details regarding the Regional Greenprint tool and the roles of local jurisdictions, County Transportation Commissions, SCAG, and other agencies and stakeholders in developing, supporting, and implementing advanced mitigation programs in the region. As such, the suggested revisions are not applied.

RESPONSE TRANS 1-2

Refer to **Master Response No. 5, Mitigation Measures**, above. As noted by the commenter, SMM-GHG-1 requires SCAG to partner with the various air districts in the region to coordinate with local jurisdictions to facilitate the preparation and adoption of qualified GHG reduction plans (e.g., climate action plans [CAPs]), develop GHG-reducing planning policies, and support local implementation of climate initiatives. Such plans and policies are intended to be adopted by local jurisdictions such that they are tailored to the specific conditions and goals of each local agency. No changes to SMM-GHG-1 are made.

RESPONSE TRANS 1-3

SCAG is not responsible for siting new facilities. Refer to **Response SUB 1-66**, above.

RESPONSE TRANS 1-4

Refer to **Master Response No. 5, Mitigation Measures**, above. SCAG does not have the authority to implement mobility improvements or other mitigation measures to address VMT. As reflected in SMM-TRA-1, and suggested by the commenter, SCAG's role is to facilitate such improvements to be implemented by local jurisdictions and other lead agencies. No changes to SMM-TRA-1 are warranted.

8.6.10 LETTER TRANS 2: SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

Raymond W. Wolfe, Executive Director
San Bernardino County Transportation Authority
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San Bernardino, CA 92410-1715

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001773** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE TRANS 2-1

This comment provides an introductory statement regarding the comments provided in this letter. Refer to **Responses TRANS 2-2 to TRANS 2-3**, below, for responses to the individual comments contained herein.

RESPONSE TRANS 2-2

Master Response No. 2, General Comments and Non CEQA Issues, above. SCAG appreciates SBCTA's support of the PEIR's mitigation approach. No further response is necessary.

RESPONSE TRANS 2-3

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.11 LETTER LOC 1: CITY OF EL SEGUNDO

Michael Allen, AICP, Community Development Director
City of El Segundo
Community Development Department
350 Main Street
El Segundo, CA 90245

January 10, 2024

RESPONSE LOC 1-1

This comment provides an introductory statement regarding the comments provided in this letter. Refer to **Responses LOC 1-2 to LOC 1-9**, below, for responses to the individual comments contained herein.

RESPONSE LOC 1-2

The assignment and distribution of aircraft to regional airports presented in the Plan and PEIR is the most reasonably foreseeable at a regional scale based on the best available information from each airport. The expert and lead agencies (e.g., county transportation commissions, local planning departments) provide data to SCAG for our regional analyses (e.g., regional surface transportation travel demand model, socio-economic-demographic forecast). As is the case for future projections for local communities and other local agency data, SCAG relies on each expert and/or lead agency to provide input regarding future conditions to be identified and evaluated in the Plan and PEIR. In the case of airport and aviation data, the expert and lead agencies include the airports, Federal Aviation Administration (FAA), Caltrans, and local and county transportation agencies. SCAG relies on the data provided by the airports as they are the lead agencies in airport planning and operations and thus maintain the most valid, accurate, current, applicable and credible information. The data provided by the airports already addresses multiple planning and operational factors, including future global, national, regional, and local aviation industry trends such as developments in aircraft. As an MPO, SCAG's primary role in aviation systems planning is airport ground access planning (Cal. Govt. Code Section 65081.1) and per FAA guidance, MPOs complement, rather than guide, the planning efforts of the FAA and airports (FAA AC150-5070-7, GAO010-120). Therefore, MPOs have no regulatory, planning, or operational authority over the airports. Refer to the Regulatory Framework section of the Aviation and Airport Ground Access Technical Report for more information.

RESPONSE LOC 1-3

Also refer to **Response LOC 1-2**. As noted above SCAG relies on regional airports to provide information regarding future projections for airports within their respective authorities and jurisdictions based on best available data. Therefore, the PEIR evaluates what's reasonably foreseeable based on best available data from expert and lead agencies. The FAA oversees the National Plan of Integrated Airport Systems (NPIAS), which includes Santa Monica Municipal and the other commercial service, reliever, and general aviation airports in the SCAG Region. Thus, in addition to the regional airports factoring in potential airport closures into their operations, planning, and data/information, the FAA also analyzes the potential effects of airport closures on the aviation system and incorporates that information, which is used by the regional airports as appropriate to update their airport planning and operations. Refer to the Regulatory Framework section of the Aviation and Airport Ground Access

Technical Report and the FAA NPIAS website (https://www.faa.gov/airports/planning_capacity/npias) for more information.

RESPONSE LOC 1-4

Also refer to **Response LOC 1-2**. The PEIR provides a regional analysis of impacts related to ground access and regional aviation based on best available data. As noted in Response LOC 1-2 SCAG obtained data from each airport with respect to future operations; The Los Angeles World Airports (LAWA) provided the relevant information regarding potential future passenger traffic at LAX. This is the best available data at the present time and is likely a conservative (i.e., reasonable worst case) estimate; it may be revised as LAX undertakes further planning and is subject to additional review and regulations. As future projections are refined, they will be addressed in future Plans and environmental documents.

RESPONSE LOC 1-5

Plans for the future configuration of the 105 freeway (identified in the Plan and evaluated in the PEIR) are based on information provided by Metro, the agency responsible for planning, implementing and maintaining the 105 freeway. Metro is responsible for ensuring the project complies with all applicable requirements including any applicable consent decrees. The project has been the subject of separate project-specific environmental review undertaken by Metro. The "Planned Dual Lane Segment" mentioned in the comment is a project that is in the FTIP, i.e., the project is funded and committed and is part of the Future No Project Condition (also referred to as the "baseline" for the Plan). The Plan, including the project list is subject to refinements over time. In the event that the 105 project were to change, such changes would be reflected in future Plans and evaluated in future environmental documents.

RESPONSE LOC 1-6

Also refer to **Response LOC 1-5**. The Plan identifies and the PEIR evaluates (at a regional scale) the reasonably foreseeable configuration of the 105 freeway, and no additional analysis, including project-level analysis, is appropriate or necessary in the PEIR.

RESPONSE LOC 1-7

Also refer to **Response LOC 1-6**. The HRA presents analysis of 16 freeway segments that provide representative conditions for all freeways in the region. (The closest segments to El Segundo are the segment of the 405 in Seal Beach, the 710 in Compton and the 110 in Carson.) No additional analysis, including project-level analysis, is appropriate or necessary in the PEIR.

RESPONSE LOC 1-8

As noted above SCAG has conducted a regional-scale analysis based on reasonably foreseeable future conditions based on best available data. Consistent with the CEQA Guidelines as revised, the focus of the PEIR transportation analysis is VMT and not vehicle delay. In addition, the transportation modeling and analysis is at the regional scale, evaluation of intersection-level impacts is not appropriate or feasible based on the level of detail in the SCAG models.

RESPONSE LOG 1-9

SCAG acknowledges that the City may supplement their comments consistent with applicable case law.

8.6.12 LETTER LOC 2: CITY OF GARDEN GROVE

Chris Chung, Senior Planner
City of Garden Grove
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P.O. Box 3070
Garden Grove, CA 92842

January 10, 2024

RESPONSE LOC 2-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses LOC 2-2 to LOC 2-10**, below, for responses to the individual comments contained herein.

RESPONSE LOC 2-2

The statistic reported here is from the US Census American Community Survey (ACS), which provides robust geographic and longitudinal comparison. The ACS does not explicitly define ADUs or lot splits; rather, its housing unit tabulations rely on definitions based on whether a unit is a stand-alone structure (see https://www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2022_ACSSubjectDefinitions.pdf). The California Department of Finance, which solicits an annual housing unit survey from local jurisdictions (<https://dof.ca.gov/forecasting/demographics/Estimates/#HUS>), clarifies that ADUs should be considered attached or detached based on structure type; however, DOF's E-5 series does not (yet) report ADUs as a separate category. While neither the Census Bureau nor DOF explicitly addresses SB 9 units, it reasons that they would be categorized by whether or not the structure is stand-alone, as is the case with other housing types.

RESPONSE LOC 2-3

As a matter of clarification, at the time of preliminary forecast development (April 2022), only 12 of 197 jurisdictions had certified housing elements. By the deadline for local jurisdiction to submit edits (December 2022), 87 had been certified. At the time of this writing, as the comment notes, the number is far higher. Section 4.6 of the Demographics & Growth Forecast Technical Report addresses the relationship between the growth projection and the 6th cycle RHNA and housing element update. Even at the time of preliminary forecast development, it was widely understood that the 6th cycle RHNA allocation would increase the supply of sites available for housing in the region. This was taken into account by the Demographic Panel of Experts when assessing demand-based growth drivers and developing county and regional projections, even in the absence of site-level detail. Since some local jurisdictions may not be required to complete rezonings associated with 6th cycle housing element updates until February 2025, complete site-level data is inherently unavailable for the purposes of Connect SoCal 2024 development. However, the expectation during the LDX and the Connect SoCal 2024 plan development process is that SCAG and local jurisdictions account for the increase in available sites resulting from RHNA into account when developing the growth forecast based on the best information available at the time.

RESPONSE LOC 2-4

The cited table reference error in the text is corrected. Also refer to Chapter 9, Section 9.4, for the associated text revisions on page ES-13.

RESPONSE LOC 2-5

Also refer to **Master Response No. 5, Approach to Mitigation Measures**, above. As noted therein, SCAG has no land use authority. Mitigation measures are identified at a programmatic level for lead agencies to consider as indicated in the introductory paragraph to each project-level set of mitigation measures “as feasible and appropriate.”

RESPONSE LOC 2-6

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE LOC 2-7

This comment requests text modifications to PMM-AG-3. Also refer to Chapter 9, Section 9.4, for the associated text modifications on page ES-22.

RESPONSE LOC 2-8

The commenter is correct in stating that there are no standard nest buffers specified in the Migratory Bird Treaty Act and Fish and Game Code. While a 300-foot buffer is a standard that has been recommended by USFWS and CDFW, buffers depend on the species and their tolerance to disturbance. Therefore, PMM-BIO-4 is modified to state that buffers may be modified as appropriate by a qualified biologist. Also refer to Chapter 9, Section 9.4, for the associated text modifications to PMM-AG-3 on page ES-22.

RESPONSE LOC 2-9

SCAG acknowledges that the City of Garden Grove does include policies related to climate, sustainability and resiliency within the City’s Local Hazard Mitigation Plan and Safety Element, however, Table 3.8-6 of the 2024 PEIR refers only to standalone plans and, therefore no text changes are warranted.

RESPONSE LOC 2-10

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan’s impact on the physical environment under CEQA. No further response is necessary.

8.6.13 LETTER LOC 3: CITY OF HUNTINGTON BEACH

Joanna Cortez, Senior Planner
City of Huntington Beach
Department of Community Development
Sacramento, Ca 94273-0001

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001761** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE LOC 3-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses LOC 3-2 to LOC 3-10**, below, for responses to the individual comments contained herein.

RESPONSE LOC 3-2

Refer to Plan **Submission ID 0001761.02** for a written response to this comment with regard to the Plan. Also refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above, for discussion regarding the approach for assumptions in developing the Plan's Forecasted Regional Development Pattern and the Priority Development Areas (PDAs) and Green Region Resource Areas (GRRAs) reflected therein. The 2024 PEIR presents a regional level analysis, and thus it is not intended to address details at a subregional level. Such details are available from SCAG to assist local jurisdictions in their evaluation of local plans but are not appropriate as part of the regional analysis. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed by local jurisdictions, including Huntington Beach, during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG's records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data for Huntington Beach and other jurisdictions became the sole reflection of anticipated growth in Connect SoCal. Individual maps for each Priority Development Area (Livable Corridors, Neighborhood Mobility Areas, Transit Priority Areas, and Spheres of Influence) at the jurisdictional level can be found in the revised Data Map Books from November 2023 hosted on SCAG's Local Data Exchange website. Refer to <https://scag.ca.gov/local-data-exchange> for each jurisdiction's Data Map Book. The requested revisions to Map 2-9 and Map 2-10 do not substantially affect the PEIR analyses or conclusions. No changes are made to this map in the PEIR. However, this map is based off a Plan map which has been updated as part of the Final Plan. Refer to Appendix J for more information.

RESPONSE LOC 3-3

Refer to Plan Submission ID 0001761 for a written response to this comment with regard to the Plan. Sea level rise, which is most specifically addressed in Section 3.10, *Hydrology and Water Quality*, of the 2024 PEIR, is an

existing environmental stressor and with the ongoing effects of global climate change it is expected to be exacerbated as ocean temperatures rise. The Plan includes policies and strategies intended to facilitate resilience and adaptation programs, including programs for coastal communities and infrastructure programs, as well as investments in new infrastructure and in maintaining existing facilities. Sea level rise, while a global process, is typically addressed at the local level as part of individual jurisdictions' detailed planning process. Such local planning processes are appropriately the sole responsibility of the respective local jurisdictions and not SCAG; refer also to **Master Response No. 4, Regional Development Pattern and Growth Forecast** regarding local jurisdiction inputs for Plan projections and growth pattern, and **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the scale of analysis presented in the 2024 PEIR. Furthermore, as discussed in the 2024 PEIR, including in Section 3.10, *Hydrology and Water Quality*, and Section 3.19, *Utilities and Service Systems*, SCAG mitigation measures and Project-level mitigation measures are provided to address regional and project-specific impacts from sea level rise and associated effects such as erosion, flooding, and damage to existing facilities and infrastructure. Also refer to **Master Response No. 5, Mitigation Measures**, above.

RESPONSE LOC 3-4

Also refer to **Response LOC 3-3** above.

RESPONSE LOC 3-5

Refer to responses provided in **Letter SUB 1** (Orange County Council of Governments [OCCOG]) and **Letter ORG 2** (Center for Demographic Research [CDR]), more specifically **Response SUB 1-11** indicated by the commenter.

RESPONSE LOC 3-6

Refer to **Response SUB 1-6** in Letter SUB 1 (OCCOG).

RESPONSE LOC 3-7

Refer to **Response SUB 1-9** in Letter SUB 1 (OCCOG).

RESPONSE LOC 3-8

Refer to **Response SUB 1-6** in Letter SUB 1 (OCCOG).

RESPONSE LOC 3-9

Refer to responses provided in Letter SUB 1 (OCCOG).

RESPONSE LOC 3-10

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.14 LETTER LOC 4: CITY OF IRVINE

Eric M. Tolles
Interim Director of Community Development
City of Irvine
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Irvine, California 92623-9575

January 11, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001721** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE LOC 4-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses LOC 4-2 to LOC 4-206**, below, for responses to the individual comments contained herein. SCAG acknowledges the City's incorporation by reference the commentary provided in Letter SUB 1 (OCCOG) and Letter ORG 2 (CDR) and confirms this letter and the referenced letters are included in the public record for the Plan and 2024 PEIR.

RESPONSE LOC 4-2

SCAG acknowledges the City's concurrence with comments provided in Letter SUB 1 (OCCOG) and Letter ORG 2 (CDR); refer to responses to Letters SUB 1 and ORG 2 in this chapter.

RESPONSE LOC 4-3

SCAG acknowledges the City's concurrence with comments provided in Letter SUB 1 (OCCOG) and Letter ORG 2 (CDR); refer to **Response SUB 1-3**.

RESPONSE LOC 4-4

SCAG acknowledges the City's concurrence with comments provided in Letter SUB 1 (OCCOG) and Letter ORG 2 (CDR); refer to **Response SUB 1-4**.

RESPONSE LOC 4-5

SCAG acknowledges the City's concurrence with comments provided in Letter SUB 1 (OCCOG) and Letter ORG 2 (CDR); refer to **Response SUB 1-6**.

RESPONSE LOC 4-6

SCAG acknowledges the City's concurrence with comments provided in Letter SUB 1 (OCCOG) and Letter ORG 2 (CDR); refer to **Response SUB 1-5**.

RESPONSE LOC 4-7

Also refer to **Response SUB 1-7**, above.

RESPONSE LOC 4-8

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above. Also refer to **Response SUB 1-8**.

RESPONSE LOC 4-9

Also refer to **Master Response No. 5, Mitigation Measures**, above. Also refer to **Response SUB 1-9**.

RESPONSE LOC 4-10

This comment raises one or more issues that are addressed in a master response in this chapter. Also refer to **Master Response No. 5, Mitigation Measures**, above. Also refer to **Response SUB 1-10**.

RESPONSE LOC 4-11

Also refer to **Response SUB 1-11**.

RESPONSE LOC 4-12

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

RESPONSE LOC 4-13

Also refer to **Response SUB 1-15**.

RESPONSE LOC 4-14

Also refer to **Response SUB 1-169**.

RESPONSE LOC 4-15

Also refer to **Response SUB 1-17**.

RESPONSE LOC 4-16

Also refer to **Response SUB 1-18**.

RESPONSE LOC 4-17

Also refer to **Response SUB 1-19**.

RESPONSE LOC 4-18

Also refer to **Response SUB 1-20**.

RESPONSE LOC 4-19

Also refer to **Response SUB 1-21**.

RESPONSE LOC 4-20

Also refer to **Response SUB 1-22**.

RESPONSE LOC 4-21

Also refer to **Response SUB 1-23**.

RESPONSE LOC 4-22

Also refer to **Response SUB 1-25**.

RESPONSE LOC 4-23

Also refer to **Response SUB 1-26**.

RESPONSE LOC 4-24

Also refer to **Response SUB 1-27**.

RESPONSE LOC 4-25

Also refer to **Response SUB 1-28**.

RESPONSE LOC 4-26

Also refer to **Response SUB 1-31**.

RESPONSE LOC 4-27

Also refer to **Response SUB 1-30**.

RESPONSE LOC 4-28

Also refer to **Response SUB 1-31**.

RESPONSE LOC 4-29

The Plan does not include High Quality Transit Areas (HQTAs) this cycle; they were a feature of the 2020 Plan. Instead, Connect SoCal 2024 identifies Priority Development Areas, that include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), Livable Corridors and in unincorporated areas Spheres of Influence, as part of the Sustainable Communities Strategy. As described in the Land Use and Communities Technical Report. Transit Priority Areas are defined by the State of California Senate Bill 743: "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations. Local transportation planning and local agencies with land use authority are responsible for ensuring that land use and transportation planning occur as appropriate to ensure a balance of land uses and available infrastructure. The move from HQTAs to PDAs was initiated through consultation with stakeholder groups, including the Technical Working Group (TWG). Through this process, the TWG and other stakeholder groups helped refine the Priority Development Areas outlined in the Plan.

RESPONSE LOC 4-30

Also refer to **Response SUB 1-32**.

RESPONSE LOC 4-31

Also refer to **Response SUB 1-33**.

RESPONSE LOC 4-32

Also refer to **Response SUB 1-34**.

RESPONSE LOC 4-33

Also refer to **Response SUB 1-35**.

RESPONSE LOC 4-34

Also refer to **Response SUB 1-36**.

RESPONSE LOC 4-35

Also refer to **Response SUB 1-37**.

RESPONSE LOC 4-36

The stated estimate of total open space within the SCAG region includes the acreage of open space areas irrespective of jurisdiction or ownership; as such, regardless of whether the land is located within a military base, urbanized area, national park, or private property, the acreage is included in the total area characterized as "open space."

RESPONSE LOC 4-37

Also refer to **Response SUB 1-38.**

RESPONSE LOC 4-38

Also refer to **Response SUB 1-39.**

RESPONSE LOC 4-39

Also refer to **Response SUB 1-40.**

RESPONSE LOC 4-40

Also refer to **Response SUB 1-41.**

RESPONSE LOC 4-41

Also refer to **Response SUB 1-42.**

RESPONSE LOC 4-42

Also refer to **Response SUB 1-43.**

RESPONSE LOC 4-43

Also refer to **Response SUB 1-44.**

RESPONSE LOC 4-44

Also refer to **Response SUB 1-44.**

RESPONSE LOC 4-45

Also refer to **Response SUB 1-45.**

RESPONSE LOC 4-46

Also refer to **Response SUB 1-46.**

RESPONSE LOC 4-47

Also refer to **Response SUB 1-47.**

RESPONSE LOC 4-48

Also refer to **Response SUB 1-48.**

RESPONSE LOC 4-49

Also refer to **Response SUB 1-49**.

RESPONSE LOC 4-50

Also refer to **Response SUB 1-50**.

RESPONSE LOC 4-51

Also refer to **Response SUB 1-51**.

RESPONSE LOC 4-52

Also refer to **Response SUB 1-52**.

RESPONSE LOC 4-53

Also refer to **Response SUB 1-54**.

RESPONSE LOC 4-54

Also refer to **Response SUB 1-58**.

RESPONSE LOC 4-55

Also refer to **Response SUB 1-56**.

RESPONSE LOC 4-56

Also refer to **Response SUB 1-57**.

RESPONSE LOC 4-57

Also refer to **Response SUB 1-58**.

RESPONSE LOC 4-58

Also refer to **Response SUB 1-59**.

RESPONSE LOC 4-59

Also refer to **Response SUB 1-60**.

RESPONSE LOC 4-60

Also refer to **Response SUB 1-61**.

RESPONSE LOC 4-61

Also refer to **Response SUB 1-62**.

RESPONSE LOC 4-62

Also refer to **Response SUB 1-63**.

RESPONSE LOC 4-63

Also refer to **Response SUB 1-64**.

RESPONSE LOC 4-64

Also refer to **Response SUB 1-65**.

RESPONSE LOC 4-65

Also refer to **Response SUB 1-66**.

RESPONSE LOC 4-66

Also refer to **Response SUB 1-67**.

RESPONSE LOC 4-67

Also refer to **Response SUB 1-68**.

RESPONSE LOC 4-68

Also refer to **Response SUB 1-69** regarding mitigation measure PMM-POP-2. With regard to the use of fire watch staff to reduce potential wildfire hazards during construction activities, as prescribed by mitigation measure PMM-WF-2(a), the commenter's speculation regarding the actual effectiveness of fire watch staffing does not warrant removal or modification of this measure, as the adoption and implementation of this and other mitigation measures is at the sole discretion of local lead agencies who select and modify mitigation on a case-by-case basis to address the unique conditions and risks associated with each project and project site. No changes to PMM-WF-2 are made in the 2024 PEIR.

RESPONSE LOC 4-69

Also refer to **Response SUB 1-70**.

RESPONSE LOC 4-70

Also refer to **Response SUB 1-71**.

RESPONSE LOC 4-71

Also refer to **Response SUB 1-72.**

RESPONSE LOC 4-724

Also refer to **Response SUB 1-73.**

RESPONSE LOC 4-73

Also refer to **Response SUB 1-74.**

RESPONSE LOC 4-74

Also refer to **Response SUB 1-75.**

RESPONSE LOC 4-75

Also refer to **Response SUB 1-76.**

RESPONSE LOC 4-76

Also refer to **Response SUB 1-77.**

RESPONSE LOC 4-77

Also refer to **Response SUB 1-78.**

RESPONSE LOC 4-78

Also refer to **Response SUB 1-79.**

RESPONSE LOC 4-79

Also refer to **Response SUB 1-80.**

RESPONSE LOC 4-80

Also refer to **Response SUB 1-81.**

RESPONSE LOC 4-81

Also refer to **Response SUB 1-82.**

RESPONSE LOC 4-82

Also refer to **Response SUB 1-83.**

RESPONSE LOC 4-83

Also refer to **Response SUB 1-84.**

RESPONSE LOC 4-84

Also refer to **Response SUB 1-85.**

RESPONSE LOC 4-85

Also refer to **Response SUB 1-86.**

RESPONSE LOC 4-86

Also refer to **Response SUB 1-87.**

RESPONSE LOC 4-87

Also refer to **Response SUB 1-88.**

RESPONSE LOC 4-88

Also refer to **Response SUB 1-89.**

RESPONSE LOC 4-89

Also refer to **Response SUB 1-90.**

RESPONSE LOC 4-90

Also refer to **Response SUB 1-91.**

RESPONSE LOC 4-91

Also refer to **Response SUB 1-92.**

RESPONSE LOC 4-92

Also refer to **Response SUB 1-93.**

RESPONSE LOC 4-93

Also refer to **Response SUB 1-94.**

RESPONSE LOC 4-94

Also refer to **Response SUB 1-95.**

RESPONSE LOC 4-95

Also refer to **Response SUB 1-96**.

RESPONSE LOC 4-96

Also refer to **Response SUB 1-97**.

RESPONSE LOC 4-97

Also refer to **Response SUB 1-98**.

RESPONSE LOC 4-98

Also refer to **Response SUB 1-99**.

RESPONSE LOC 4-99

Also refer to **Response SUB 1-100**.

RESPONSE LOC 4-100

Also refer to **Response SUB 1-101**.

RESPONSE LOC 4-101

Also refer to **Response SUB 1-102**.

RESPONSE LOC 4-102

Also refer to **Response SUB 1-103**.

RESPONSE LOC 4-103

Also refer to **Response SUB 1-104**.

RESPONSE LOC 4-104

Also refer to **Response SUB 1-105**.

RESPONSE LOC 4-105

Also refer to **Response SUB 1-106**.

RESPONSE LOC 4-106

Also refer to **Response SUB 1-107**.

RESPONSE LOC 4-107

Also refer to **Response SUB 1-111**.

RESPONSE LOC 4-108

Also refer to **Response SUB 1-109**.

RESPONSE LOC 4-109

Also refer to **Response SUB 1-110**.

RESPONSE LOC 4-110

The commenter is correct that the reference is to the year 1750. Also refer to Chapter 9, Section 9.4, for text modifications to the discussion on page 3.8-7 within the greenhouse gas emissions section of the 2024 PEIR. The commenter is correct that the reference is to the year 1750.

RESPONSE LOC 4-111

The commenter is correct that 120,000 refers to years. Also refer to Chapter 9, Section 9.4, for text modifications to the discussion on page 3.8-7 within the greenhouse gas emissions section of the 2024 PEIR. The commenter is correct that 120,000 refers to years.

RESPONSE LOC 4-112

Also refer to **Response SUB 1-111**.

RESPONSE LOC 4-113

Also refer to **Response SUB 1-112**.

RESPONSE LOC 4-114

Also refer to **Response SUB 1-113**.

RESPONSE LOC 4-115

Also refer to **Response SUB 1-114**.

RESPONSE LOC 4-116

Also refer to **Response SUB 1-115**.

RESPONSE LOC 4-117

Also refer to **Response SUB 1-116**.

RESPONSE LOC 4-118

Also refer to **Response SUB 1-117**.

RESPONSE LOC 4-119

Also refer to **Response SUB 1-118**.

RESPONSE LOC 4-120

Also refer to **Response SUB 1-119**.

RESPONSE LOC 4-121

Also refer to **Response SUB 1-120**.

RESPONSE LOC 4-122

Also refer to **Response SUB 1-121**.

RESPONSE LOC 4-123

Also refer to **Response SUB 1-122**.

RESPONSE LOC 4-124

Also refer to **Response SUB 1-123**.

RESPONSE LOC 4-125

Also refer to **Response SUB 1-124**.

RESPONSE LOC 4-126

Also refer to **Response SUB 1-125**.

RESPONSE LOC 4-127

Also refer to **Response SUB 1-126**.

RESPONSE LOC 4-128

Also refer to **Response SUB 1-127**.

RESPONSE LOC 4-129

Also refer to **Response SUB 1-128**.

RESPONSE LOC 4-130

Also refer to **Response SUB 1-129**.

RESPONSE LOC 4-131

Also refer to **Response SUB 1-130**.

RESPONSE LOC 4-132

Also refer to **Response SUB 1-131**.

RESPONSE LOC 4-133

Also refer to **Response SUB 1-132**.

RESPONSE LOC 4-134

Also refer to **Response SUB 1-133**.

RESPONSE LOC 4-135

Also refer to **Response SUB 1-134**.

RESPONSE LOC 4-136

Also refer to **Response SUB 1-135**.

RESPONSE LOC 4-137

Also refer to **Response SUB 1-136**.

RESPONSE LOC 4-138

Also refer to **Response SUB 1-137**.

RESPONSE LOC 4-139

Also refer to **Response SUB 1-138**.

RESPONSE LOC 4-140

Also refer to **Response SUB 1-139**.

RESPONSE LOC 4-141

Also refer to **Response SUB 1-140**.

RESPONSE LOC 4-142

Also refer to **Response SUB 1-141**.

RESPONSE LOC 4-143

Also refer to **Response SUB 1-142**.

RESPONSE LOC 4-144

Also refer to **Response SUB 1-143**.

RESPONSE LOC 4-145

Also refer to **Response SUB 1-144**.

RESPONSE LOC 4-146

Also refer to **Response SUB 1-145**.

RESPONSE LOC 4-147

Also refer to **Response SUB 1-146**.

RESPONSE LOC 4-148

Also refer to **Response SUB 1-147**.

RESPONSE LOC 4-149

Also refer to **Response SUB 1-148**.

RESPONSE LOC 4-150

Also refer to **Response SUB 1-149**.

RESPONSE LOC 4-151

Also refer to **Response SUB 1-150**.

RESPONSE LOC 4-152

Also refer to **Response SUB 1-151**.

RESPONSE LOC 4-153

Also refer to **Response SUB 1-152**.

RESPONSE LOC 4-154

Also refer to **Response SUB 1-153.**

RESPONSE LOC 4-155

Also refer to **Response SUB 1-154.**

RESPONSE LOC 4-156

Also refer to **Response SUB 1-155.**

RESPONSE LOC 4-157

Also refer to **Response SUB 1-156.**

RESPONSE LOC 4-158

Also refer to **Response SUB 1-157.**

RESPONSE LOC 4-159

Also refer to **Response SUB 1-158.**

RESPONSE LOC 4-1605

Also refer to **Response SUB 1-159.**

RESPONSE LOC 4-161

Also refer to **Response SUB 1-160.**

RESPONSE LOC 4-162

Also refer to **Response SUB 1-161.**

RESPONSE LOC 4-163

Also refer to **Response SUB 1-162.**

RESPONSE LOC 4-164

Also refer to **Response SUB 1-163.**

RESPONSE LOC 4-165

Also refer to **Response SUB 1-164.**

RESPONSE LOC 4-166

Also refer to **Response SUB 1-165**.

RESPONSE LOC 4-167

Also refer to **Response SUB 1-166**.

RESPONSE LOC 4-168

Also refer to **Response SUB 1-167**.

RESPONSE LOC 4-169

Also refer to **Response SUB 1-168**.

RESPONSE LOC 4-170

Also refer to **Response SUB 1-169**.

RESPONSE LOC 4-171

Also refer to **Response SUB 1-170**.

RESPONSE LOC 4-172

Also refer to **Response SUB 1-171**.

RESPONSE LOC 4-173

Also refer to **Response SUB 1-172**.

RESPONSE LOC 4-174

Also refer to **Response SUB 1-173**.

RESPONSE LOC 4-175

Also refer to **Response SUB 1-174**.

RESPONSE LOC 4-176

Also refer to **Response SUB 1-175**.

RESPONSE LOC 4-177

Also refer to **Response SUB 1-176**.

RESPONSE LOC 4-178

Also refer to **Response SUB 1-177.**

RESPONSE LOC 4-179

Also refer to **Response SUB 1-178.**

RESPONSE LOC 4-180

Also refer to **Response SUB 1-179.**

RESPONSE LOC 4-181

Also refer to **Response SUB 1-180.**

RESPONSE LOC 4-182

Also refer to **Response SUB 1-181.**

RESPONSE LOC 4-183

Also refer to **Response SUB 1-182.**

RESPONSE LOC 4-184

Also refer to **Response SUB 1-183.**

RESPONSE LOC 4-185

Also refer to **Response SUB 1-184.**

RESPONSE LOC 4-186

Also refer to **Response SUB 1-185.**

RESPONSE LOC 4-187

Also refer to **Response SUB 1-186.**

RESPONSE LOC 4-188

Also refer to **Response SUB 1-187.**

RESPONSE LOC 4-189

Also refer to **Response SUB 1-188.**

RESPONSE LOC 4-190

Also refer to **Response SUB 1-189**.

RESPONSE LOC 4-191

Also refer to **Response SUB 1-190**.

8.6.15 LETTER LOC 5: CITY OF RIVERSIDE

Matthew Taylor, Principal Planner
City of Riverside
Community Development Department
Planning Division
3900 Main Street
Riverside, CA 92522

January 12, 2024

RESPONSE LOC 5-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses LOC 5-2 to LOC 5-11**, below, for responses to the individual comments contained herein.

RESPONSE LOC 5-2

Refer to **Master Response No. 5, Mitigation Measures**, above. SCAG has no land use authority and no funding/financial authority over transportation projects and therefore the range of actions that SCAG can take to reduce physical environmental impacts is limited. Information sharing is a critical part of SCAG's role in the region, by facilitating sharing of technical and scientific information SCAG facilitates understanding of issues (including environmental impacts), communication among planners, scientists and decision-makers and innovates and accelerates problem-solving including mitigation identification and implementation. SCAG uses a variety of communication tools and frequency of coordination varies as appropriate to address the issues at hand. For instance, the [SCAG Regional Data Platform \(RDP\)](#), [SoCal Atlas](#), [HELPR](#), and other GIS resources and data services (as detailed in SMM-GEN-1 and SMM-AG-3) provide examples of specific tools SCAG uses for information sharing. SCAG's Toolbox Tuesday and Intergovernmental Review (IGR) programs (detailed in SMM-LU-2 and SMM-LU-3) are other examples of communication tools. These tools are updated or expanded on an as needed basis. The following working groups provide examples of the various forums SCAG uses and will continue to use for information sharing with different stakeholders and local jurisdictions: (1) SCAG's Natural & Farm Lands Conservation Working Group (detailed in SMM-AG-2 and SMM-BIO-1); (2) SCAG's Transportation Conformity Working Group (detailed in SMM-AQ-1); (3) SCAG's Aviation Technical Advisory Committee (detailed in SMM-HAZ-2); (4) SCAG's Sustainable & Resilient Communities Working Group (detailed in SMM-HYD-1); (5) SCAG's Housing Working Group (detailed in SMM-POP-1); (6) SCAG's Equity Working Group (detailed in SMM-REC-1); and (7) Safe and Active Streets Working Group (detailed in SMM-TRA-1). These working groups meet regularly at a bimonthly or quarterly basis. In addition, SCAG's monthly Policy Committees and Regional Council meetings serve as another example of a communication tool and forum with local jurisdictions and regional stakeholders. All mitigation measures are reevaluated and updated every four years as part of the Plan update. No revisions to this mitigation are warranted.

RESPONSE LOC 5-3

The 6th cycle Regional Housing Needs Assessment (RHNA) rezoning deadline for local jurisdictions is based on when they achieved compliance, some local jurisdictions are not required to complete rezonings associated with

housing element updates until February 2025. This text of the 2024 PEIR is corrected accordingly. Also refer to Chapter 9, Section 9.4, page 3.14-16, for the associated text modifications to the 2024 PEIR.

RESPONSE LOC 5-4

Refer to **Response LOC 5-2** above. As noted above, SCAG has no land use authority and does not presume to usurp the authority of local jurisdictions in their role as lead agency and the associated responsibilities to for evaluate impacts, identify appropriate and feasible mitigation and determine if/how a project within their jurisdiction is consistent with the Plan. Nevertheless, SCAG does provide feedback through its Intergovernmental Review (IGR) process for regionally significant projects and grant funding process for certain projects.

RESPONSE LOC 5-5

Refer to **Response LOC 5-2** above.

RESPONSE LOC 5-6

Refer to **Response LOC 3-2** above regarding local jurisdictions' roles and responsibilities in local planning efforts, which includes the provision of housing to meet projected needs. Also refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above. SCAG is tasked with planning at the regional level for forecasted growth. If and when the forecast changes, then the Plan adapts every four years to reflect the changing conditions and trends (as it did this cycle with substantially less population growth forecast in the 2024 Plan than in the 2020 Plan). Refer to Chapter 9, Section 9.4, for resulting text changes to page 3.14-25.

RESPONSE LOC 5-7

Also refer to Chapter 9, Section 9.4, for text modifications to add discussion of the Housing Crisis Act of 2019 (Senate Bill 330) on page 3.14-14 in Section 3.14, *Population and Housing*, of the 2024 PEIR.

RESPONSE LOC 5-8

Also refer to Chapter 9, Section 9.4, *Cultural Resources* section, for requested text modifications to City General Plans and Ordinances discussion on page 3.5-24.

RESPONSE LOC 5-9

Also refer to Chapter 9, Section 9.4, for text modifications to pages 4-25 and 4-38 regarding the discussion of population and housing impacts associated with the Alternatives analyzed in the 2024 PEIR.

RESPONSE LOC 5-10

Also refer to Chapter 9, Section 9.4, for text modifications to the discussion of the City or Riverside's Restorative Growthprint Plan on page 3.8-50 in Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR.

RESPONSE LOC 5-11

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.16 LETTER LOC 6: CITY OF WHITTIER

Werner Abrego, Assistant Planner
City of Whittier
Community Development Department
13230 Penn Street
Whittier, CA 90602

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001820** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE LOC 6-1

Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, and **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above.

8.6.17 LETTER ORG 1: CITIZENS COALITION FOR SAFE COMMUNITY AND SIERRA CLUB TRANSPORTATION

Dr. Tom Williams
Citizens Coalition for Safe Community and Sierra Club Transportation

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001700** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 1-1

As noted in Section 8.1.2 above, the 2024 PEIR was released for a 65-day public review and comment period that started on Thursday, November 9, 2023, and ended on Friday, January 12, 2024. The NOA for the 2024 Draft PEIR, which included a link to the 2024 Draft PEIR document on SCAG's website at <https://scag.ca.gov/peir>, was uploaded to and filed with the Governor's Office of Planning and Research (OPR) CEQA submit Database on November 9, 2023. In addition, the NOA was posted with each of the County Clerks for the six counties in the SCAG region. The NOA and the 2024 Draft PEIR were distributed primarily using electronic mail to more than 7,900 interested parties including representatives of Native American tribes, federal, state, regional and local government agencies, and other interested agencies, organizations, and individuals. A summary of the NOA was published on SCAG's website as well as in 13 newspapers. Hard copies of the NOA were also mailed directly to approximately 171 interested parties, including federal, state, regional and local agencies, organizations using the U.S. Postal Service certified mail service and first-class mail, as appropriate, and additional hard copies of the NOA (separate versions in five languages) were sent via certified mail to 68 major libraries in the region. Hard copies of the NOA and 2024 Draft PEIR were also available at all six of the SCAG Regional Office locations. This comment does not provide any specific comments regarding the Draft 2024 PEIR or its contents. No further response is necessary.

8.6.18 LETTER ORG 2: CENTER FOR DEMOGRAPHIC RESEARCH

Deborah S. Diep, Director
Center for Demographic Research
1121 N. State College Blvd., Suite 238
Fullerton, CA 92831-3014

January 11, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001706** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 2-1

SCAG acknowledges the CDR's concurrence with comments provided in Letter SUB 1 (OCCOG); refer to **Response SUB 1-6**, above.

RESPONSE ORG 2-2

SCAG acknowledges the CDR's concurrence with comments provided in Letter SUB 1 (OCCOG); refer to **Response SUB 1-3**, above.

RESPONSE ORG 2-3

SCAG acknowledges the CDR's concurrence with comments provided in Letter SUB 1 (OCCOG).

8.6.19 LETTER ORG 3: CENTER FOR DEMOGRAPHIC RESEARCH

Deborah S. Diep, Director
Center for Demographic Research
1121 N. State College Blvd., Suite 238
Fullerton, CA 92831-3014

January 11, 2024

RESPONSE ORG 3-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses ORG 3-2 to ORG 3-5**, below, for responses to the individual comments contained herein.

RESPONSE ORG 3-2

SCAG acknowledges the CDR's concurrence with comments provided in Letter SUB 1 (OCCOG); refer to **Response SUB 1-6**, above.

RESPONSE ORG 3-3

SCAG acknowledges the CDR's concurrence with comments provided in Letter SUB 1 (OCCOG); refer to **Response SUB 1-3**, above.

RESPONSE ORG 3-4

SCAG acknowledges the CDR's concurrence with comments provided in Letter SUB 1 (OCCOG).

8.6.20 LETTER ORG 4: FRIENDS OF HARBORS, BEACHES, AND PARKS

Michael Wellborn, President
Friends of Harbors, Beaches, and Parks
P.O. Box 9256
Newport Beach, CA 92658-9256

December 26, 2023

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission IDs 0001685, 0001686, and 0001687** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 4-1

Refer to **Response LOC 3-3**, above.

RESPONSE ORG 4-2

The commenter's assertions regarding the effects of out-migration from the state, while acknowledged, do not raise any specific issues regarding the analysis presented in the 2024 PEIR. While significant population decline would result in changes in housing, transportation, and economic trends in the region, the 2024 PEIR evaluates the impacts of the Plan based on the growth projections provided therein, which are themselves based on extensive input from local jurisdictions. As such, it is speculative to evaluate the impacts of a declining growth trend in the 2024 PEIR (also see **Master Response No. 6, Alternatives**, above, regarding the range of alternatives considered in the 2024 PEIR, and **Master Response No. 4, Regional Development Pattern and Growth Forecast**, regarding the growth forecast utilized in the Plan). With regard to existing infrastructure, the Plan focuses a significant financial investment in the maintenance and preservation of existing infrastructure and facilities, which is also reflected in the assumptions utilized in the analysis of Plan-related impacts in the 2024 PEIR. No further response is necessary.

RESPONSE ORG 4-3

The Plan addresses the decline of traditional transportation funding sources through various user fee programs. More specifically, as discussed on page 3.17-48 in Section 4.17, *Transportation*, Connect SoCal 2024 includes a local road charge program in the form of mileage-based user fees regionally, which can be adjusted by time-of-day at major activity centers. SCAG assumed congestion pricing during peak periods along with increases in parking pricing at major job centers in Los Angeles. The implementation of user-fees and pricing strategies can be structured to increase equity and mobility while reducing environmental impacts. The imposition of user fees to help facilitate system preservation for existing infrastructure and other transportation investments is not included as a mitigation measure; rather, it is included as a Regional Strategic Investment and Implementation Strategy, and therefore embedded as a "Plan Feature." As such, the Plan would effectively reduce environmental impacts through implementation of user fee programs to ensure adequate funding in support of the "fix it first" principle noted by the commenter. Also refer to Section 6.3 of the Plan's Land Use and Communities Technical Report for more information. Also refer to **Master Response No. 5, Mitigation Measures**, above, for more

information on “Plan Features.” Also refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, regarding local agencies’ responsibility for the development pattern within their respective jurisdictions.

RESPONSE ORG 4-4

Refer to **Response ORG 5-27** and **Master Response No. 5, Mitigation Measures**, specifically the Plan Features discussion.

RESPONSE ORG 4-5

Regarding the estimated improved habitat acreage under the Plan, refer to Plan **Submission ID 0001686**. As noted therein and in Chapter 9, SPM results were updated as part of the Final Plan. The revisions do not result in substantial changes to the information, analysis, and conclusions presented in the Draft PEIR, including modeling results.

RESPONSE ORG 4-6

Refer to Plan **Submission ID 0001686** for a written response to this comment with regard to the Plan. As noted therein and in Chapter 9, SPM results were updated as part of the Final Plan. The revisions do not result in substantial changes to the information, analysis, and conclusions presented in the Draft PEIR. Section 3.19, *Utilities and Service Systems*, the 2024 PEIR includes mitigation measures that would result in water conservation and efficiency in future projects in the region. No additional mitigation measures or policies are proposed to address water consumption.

8.6.21 LETTER ORG 5: FRIENDS OF HARBORS, BEACHES, AND PARKS

Michael Wellborn, President
Friends of Harbors, Beaches, and Parks
P.O. Box 9256
Newport Beach, CA 92658-9256

January 11, 2024

RESPONSE ORG 5-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses ORG 5-2 to ORG 5-33**, below, for responses to the individual comments contained herein.

RESPONSE ORG 5-2

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, regarding the opinions expressed in this comment relating to the degree to which the Plan addresses environmental resources, issues, and impacts, and the assertion that the 2024 PEIR could further reduce impacts associated with Plan implementation. While the comment suggests that Plan-related impacts could be further reduced, the comment offers no specific suggestions or commentary regarding the 2024 PEIR or its contents.

With respect to Plan and PEIR estimates of loss of natural and farmlands, this results from SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional Plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. Also refer to Chapter 3 of the Plan for more details. Note that the SPM results were updated as part of the Final Plan as described in Chapter 9. The modeling updates do not result in substantial changes to the information, analysis, and conclusions presented in the Draft PEIR. Refer to Plan **Submission ID 0001686** for additional details. While SCAG conservatively concludes that impacts would be significant and unavoidable even with implementation of mitigation measures, lead agencies can and should prescribe additional mitigation for future projects with potential agricultural, farmland, and natural land impacts as appropriate and feasible.

RESPONSE ORG 5-3

Also refer to **Master Response No. 5, Mitigation Measures**, above. SoCal Greenprint is appropriately detailed in a separate SCAG mitigation measure under SMM-AG-3 and repeating it in another measure would not reduce impacts any further. Nonetheless, SoCal Greenprint will be web-based and easily accessible, consistent with the recent adoption (February 1, 2024) of the SoCal Greenprint Data Standards and updates to the SCAG RAMP Policy Framework. For additional information, please see SCAG staff report to the Regional Council on February 1, 2024, available at: <https://scag.ca.gov/sites/main/files/file-attachments/rc020124fullpacket.pdf>. No change to the text of the 2024 PEIR is warranted.

RESPONSE ORG 5-4

Refer to **Master Response No. 5, Mitigation Measures**, above. As noted therein, it is the responsibility of local jurisdictions to prescribe mitigations measures that are best suited to address impacts of a particular project in a given location. PMM-AES-1 states, “[s]uch measures may include the following or other comparable measures identified by the lead agency,” which is intended to provide flexibility and avoid being overly prescriptive. As such, the inclusion of the details suggested by the commenter are not necessary or appropriate. No change to the text of the 2024 PEIR is made.

RESPONSE ORG 5-5

The text of mitigation measure PMM-AG-3 has been revised to address impacts to forest land and remove references to agricultural land and timberland. Refer to Chapter 9, Section 9.4, for text modifications to PMM-AG-3 on page ES-22. Impacts relating to viewshed are addressed in Section 3.1, *Aesthetics*, of this PEIR. Refer to SMM-GEN-1, PMM-AES-1, PMM-AES-2, and PMM-AES-3 for mitigation for potentially significant impacts on aesthetics, including viewshed. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail in the 2024 PEIR, and **Master Response No. 5, Mitigation Measures**, above. National monuments are addressed in Section 3.5, *Cultural Resources*, and Section 3.16, *Recreation*, of this PEIR. The National Monuments within the SCAG region are co-managed by the United States Forest Service and the Bureau of Land Management. Impacts to National monuments would be addressed at the project level; as such, mitigation measure PMM-AG-3 is modified to specifically address impacts to National Monuments in the region. Also refer to Chapter 9, Section 9.4, for the resulting text modifications to PMM-AG-3 on page ES-22.

RESPONSE ORG 5-6

Also refer to **Response ORG 5-5**, above.

RESPONSE ORG 5-7

PMM-BIO-4(g) requires that projects address impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors in the project design. As such, this measure requires consideration of potential wildlife movement and habitat connectivity during project design, which is what the commenter suggests. No changes to the 2024 PEIR are warranted.

RESPONSE ORG 5-8

Also refer to **Master Response No. 5, Mitigation Measures**, above. As noted in Mitigation Measure PMM-BIO-4, “such measures may include the following or other comparable measures identified by the lead agency,” which does not preclude the use of other mechanisms available to address wildlife movement and habitat connectivity in the region. As suggested by the commenter, such options include acquisition or preservation of landscapes and habitat types in partnership with agencies, conservancies, joint-powers authorities, and/or land trusts, or fee title acquisition. No changes to the 2024 PEIR are made.

RESPONSE ORG 5-9

Also refer to **Response ORG 5-7**, above. While measure PMM-BIO-4(m) addresses wildlife crossings for transportation projects specifically, the intent of the measure is to allow for wildlife movement within the region

with a focus on linear projects like transportation facilities but could include other project types as noted by the commenter. As noted in **Response ORG 5-8**, lead agencies have full discretion regarding if, how, when, and where to apply and implement the project-level mitigation measures included in the 2024 PEIR. Similar measures may be required by lead agencies that are tailored to the specific project, physical conditions, affected resources, and issues at hand on a case-by-case basis. With regard to the comment about the functionality of this measure and applicability to a wide range of species, PMM-BIO-4(m) also suggests that such crossings be designed “in accordance with proven standards ... and in coordination with wildlife corridor authorities.” As such, it is expected that crossing facilities would be designed according to the specific conditions present and in accordance with established guidance. No changes to the 2024 PEIR are made.

RESPONSE ORG 5-10

Also refer to **Master Response No. 5, Mitigation Measures**, above. Also refer to **Response ORG 5-3**.

RESPONSE ORG 5-11

The 2024 PEIR considered all relevant input provided during the various stakeholder outreach events, working group meetings, and CEQA scoping and public comment processes. The RAMP program noted by the commenter is no longer included as a mitigation measure as it was in the 2020 PEIR, but rather this program has been elevated and is incorporated as a Plan feature (included among Plan Implementation Strategies and Regional Strategic Investment). However, all feedback received on RAMP was considered in the development of the Plan and of the RAMP itself. SCAG staff continues to refine regional planning tools including the recent adoption (February 1, 2024) of the SoCal Greenprint Data Standards and updates to the SCAG RAMP Policy Framework. The RAMP is a Plan feature and will be implemented as part of the Plan (refer also to **Response ORG 5-28**) and Greenprint will be implemented as part of ongoing commitments and PEIR mitigation. Both Greenprint and the RAMP will serve to provide various environmental benefits and address Plan-related impacts. Refer to **Master Response No. 5, Mitigation Measures**, specifically the Plan Features discussion.

RESPONSE ORG 5-12

As noted by the commenter, and as explained in Section 3.0, *Introduction to the Analysis* (see subsection CEQA Baseline Conditions for Analysis of Impacts), the baseline year for the analysis in the 2024 PEIR is generally 2019 in order to present a consistent basis for analysis. For some topic areas (such as agriculture and forestry resources, hydrology and water quality, and utilities and service systems) resources, facilities, or conditions were not notably affected by pandemic-related societal changes or relevant trends have emerged or continued since 2019 conditions. Where appropriate and identified throughout this 2024 PEIR, the environmental and regulatory settings of various resource areas used more recent data to better characterize baseline conditions. Or, conversely, where data were unavailable for 2019 or a more recent year, the most recent data were used (typically 2022). Also refer to the *Methodology* section for each resource area for an additional discussion of data used to characterize environmental and regulatory settings for each resource topic. Further, as noted in Section 3.0, “Although many pandemic-affected activities have stabilized and, in some cases returned to pre-pandemic levels, many key factors such as widespread work-from-home policies, food and retail product delivery services and leisure travel demands have not returned to prior conditions and may never do so.”

RESPONSE ORG 5-13

Also refer to **Response ORG 5-12**, above. As discussed in Subsection 3.17.1, Environmental Setting, in Section 3.17, *Transportation*, of the 2024 PEIR, post-pandemic conditions have not yet stabilized sufficiently for SCAG to evaluate a definitive post-pandemic set of assumptions different from those pre-pandemics, with the exception of increasing work-from-home assumptions as compared to the 2020 Plan.

RESPONSE ORG 5-14

As discussed in Section 3.14, *Population and Housing*, and Chapter 5, *Other CEQA Considerations*, the Plan provides a coordinated strategy for managing land use patterns and transportation improvements to accommodate projected population growth. For example, the Plan encourages and facilitates concentrating development within existing urban areas, disturbed areas with existing infrastructure, and with access to transit and other modes of transportation, and to avoid substantial development within resource-rich and or hazardous areas (GRRAs). The Plan's transportation projects are designed and phased to address existing demands for additional facilities and are not intended to encourage growth in new areas where no development currently exists. Thus, while the Plan has the potential to influence growth in specific parts of the region (including areas that are partially urbanized already) by providing new or expanded access, overall, the Plan is a response to forecast growth and would accommodate and facilitate growth in the region rather than induce growth.

As such, the 2024 PEIR includes mitigation measures to reduce all types of physical environmental impacts from all types of growth including mitigation measures to be implemented by local jurisdictions to facilitate community input and sound planning to successfully manage growth. Nonetheless, impacts were conservatively determined to be significant and unavoidable.

Refer to **Response ORG 5-2** regarding SPM updates the estimated natural land and farmland acreage consumption under the Final Plan.

RESPONSE ORG 5-15

Also refer to **Master Response No. 5, Mitigation Measures**, above. Also refer to **Response ORG 5-2**, above, regarding SPM modeling updates under the Final Plan, and **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail in the 2024 PEIR.

RESPONSE ORG 5-16

Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail in the 2024 PEIR, and **Master Response No. 5, Mitigation Measures**, above.

RESPONSE ORG 5-17

The loss of Important Farmland between 1984 and 2018 was due to increased urbanization throughout the SCAG region. The acreages presented in Table 3.2-3 on page 3.2-4 are based on empirical data compiled by the California Department of Conservation, and as such the table reflects the actual measured losses in the region between 1984 and 2018. Connect SoCal 2024 includes regional policies, implementation strategies and investments to help protect natural and farmlands over the life of the Plan (through year 2050), including increased density and infill development, as described on page 3.2-14 of the 2024 PEIR, and thus computer modeling software is employed

to estimate the potential impacts associated with implementation of the Plan. The acreages presented in Table 3.2-4 on page 3.2-14 are based on the results of SPM modeling and thus are not based on empirical data as was presented in Table 3.2-3 for existing conditions. Therefore, the comparison raised by the commenter regarding the disparity in annual important farmland acreage lost is not “apples to apples” and the information presented in Table 3.2-4 is intended to provide context of the potential long-term outcome of Plan implementation. Also refer to **Response ORG 5-2**, above, regarding SPM modeling updates under the Final Plan and additional need for mitigation.

RESPONSE ORG 5-18

Refer to Chapter 9, Section 9.4, for text modifications to PMM-WF-1 on page ES-77 in response to this comment.

RESPONSE ORG 5-19

Also refer to **Response ORG 5-17**, above.

RESPONSE ORG 5-20

SCAG acknowledges FHBP’s support of SMM-AG-2 and comments on timing, noticing, and attendance. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above. No further response is necessary.

RESPONSE ORG 5-21

Also refer to **Master Response No. 5, Mitigation Measures**, above and **Response ORG 5-3**. SCAG is in the process of developing the SoCal Greenprint tool, which will be updated in accordance with the schedule developed as part of that process. No change is made to mitigation measure SMM-AG-3.

RESPONSE ORG 5-22

Also refer to **Master Response No. 5, Mitigation Measures**, above. Also refer to Chapter 9, Section 9.4, for text modifications to PMM-AG-3 on page ES-22 in the 2024 PEIR Executive Summary and corresponding edits on page 3.2-18 in Section 3.2, *Agriculture and Forestry Resources*, to specifically address impacts to forest land, which is the subject of the analysis under Impact AG-3. No additions to PMM-AG-3 regarding agricultural easements are made to the measure given the focus of this mitigation measure, as modified, is appropriately impacts to forest land. As discussed under Impact AG-3, no timberlands are located within the SCAG region and thus no impacts would occur and no mitigation measures are necessary. Furthermore, SCAG has no authority to impose project-level mitigation measures; rather, lead agencies have the discretion to determine if conservation easements are feasible and the details of any conservation easements imposed on projects.

RESPONSE ORG 5-23

Also refer to **Response ORG 5-5**, above.

RESPONSE ORG 5-24

Also refer to **Master Response No. 5, Mitigation Measures**, above. “Economically viable farming” simply means that the revenues from the agricultural products are sufficient to sustain ongoing operations. Regarding buffers

for new development, mitigation measure PMM-AG-1(f) on page 3.2-16 includes the “[u]se berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.” No text changes to the 2024 PEIR are made.

RESPONSE ORG 5-25

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above. SCAG engaged with jurisdictions in 2022 to review the initial growth forecast and provided maps with several different wildlife and habitat data layers, both individually and grouped by the themes, to help inform that feedback. These are referred to collectively as Green Region Resource Areas (GRRAs) in the Land Use & Communities Technical Report. Data layers include the California Department of Fish and Wildlife's California Natural Diversity Database for rare, threatened and endangered species and plants, and the following datasets to define sensitive habitat areas: US Fish and Wildlife Services National Wetlands Inventory Data; California Department of Fish and Wildlife Areas of Conservation Emphasis; and the California Department of Fish and Wildlife Habitat Connectivity Project. Some data layers may differ from those utilized for analysis in the PEIR as the GRRAs were representative of data available in 2022. Refer to Submission IDs 0001688 and 0001755.

RESPONSE ORG 5-26

As shown on page 3.20-23 in Section 3.20, *Wildfire*, of the 2024 PEIR, PMM-WF-1(e) identifies a potential project-level mitigation measure for lead agencies to impose as appropriate and feasible to “[e]nforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures,” which provides the fuel management guidance suggested by the commenter. As such, the 2024 PEIR does identify mitigation measures that facilitate fire-resilience practices such as active fuel management and incorporation of fire-resistant plant palettes for landscaping.

RESPONSE ORG 5-27

Also refer to **Master Response No. 5, Mitigation Measures**, above, specifically the Plan Features discussion and **Response ORG 5-11**. The RAMP is now incorporated as a feature of the Plan through a Regional Strategic Investment and Implementation Strategy, and thus, it is not included as a mitigation measure in the 2024 PEIR. Nevertheless, the RAMP program is intended to reduce impacts to sensitive resources and SCAG will work with implementation agencies to support, establish, or supplement voluntary Regional Advance Mitigation Programs, which would ultimately result in the overall reduction of impacts to affected resources in the region. As a Plan feature, this program has been allocated financial resources for its implementation, and as such it is anticipated that the voluntary RAMP program will result in a measurable reduction in impacts to sensitive resources in the region over the Plan horizon. Refer to Plan **Submission ID 0001686** for more information. As stated therein, SCAG recently adopted the Regional Advance Mitigation Program Policy Framework, which identifies how SCAG can support and expand advance mitigation programs in the region. CEQA permits the incorporation of environmental considerations into a project design, thereby reducing environmental impacts and associated mitigation. No text changes to the 2024 PEIR are made.

RESPONSE ORG 5-28

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, and **Master Response No. 5, Approach to Mitigation Measures**, above. As part of developing the RAMP, SCAG will work to implement the

recently adopted Regional Advance Mitigation Program Policy Framework, which affirmatively identifies SCAG's role to:

- Be a resource for local partners to consider actions in a regional context;
- Focus this policy on the transportation sector and related infrastructure, and consider future policy opportunities to expedite and streamline mitigation needs for other sectors including housing, energy and utilities;
- Identify ways to support implementing agencies to establish or supplement regional conservation and mitigation banks and other approaches to more effectively address impacts for projects that support reduction of per-capita vehicle miles traveled;
- Support implementing agencies with data sharing, information and other resources helpful to their long-term management and stewardship of conserved properties;
- Initiate studies to assess gaps where programs do not exist, and ascertain best ways to collaborate with partner agencies and permitting entities to address those gaps, including by supporting implementation agencies in developing new or partnership efforts;
- Pursue partnerships and collaborative resource development with state agencies and other MPOs to leverage funding and align efforts beyond SCAG's jurisdictional boundaries;
- Be a data resource with widely accessible data tools to help municipalities and transportation agencies make better land use and transportation infrastructure decisions and conserve natural and farm lands, consistent with Connect SoCal's PEIR Mitigation Measure SMM AG-2 and SMM BIO-2;
- Use a science-based methodology to support implementing agencies' development of various RAMP initiatives across the region; and
- Develop a process for monitoring and measuring outcomes from RAMP efforts.

Refer to Submission ID 0001755 and 0001763 in the Public Participation and Consultation Technical Report for more information on RAMP.

RESPONSE ORG 5-29

Refer to **Master Response No. 5, Mitigation Measures**, above. As noted, SCAG has no land use authority or ability to enforce mitigation measures; similarly, SCAG has no authority to provide assurances regarding the manner, location, timeline, timing of payment, or oversight of project-level mitigation measures, including the use of in-lieu fees. No further response is necessary.

RESPONSE ORG 5-30

Refer to **Response ORG 5-29** above.

RESPONSE ORG 5-31

Refer to **Response ORG 5-29** above.

RESPONSE ORG 5-32

Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail in the 2024 PEIR, and **Master Response No. 5, Mitigation Measures**, above. Impact BIO-4 discusses the goals of the Plan to preserve, enhance, and restore regional wildlife connectivity. SMM-GEN-1, SMM-AG-1 through SMM-AG-3, SMM-GHG-1, SMM-LU-3, SMM-WF-1, and PMM-BIO-1 through PMM-BIO-4 provide mitigation measures that address the protection and creation of wildlife corridors. While the mitigation measures will reduce impacts related to wildlife movement, given the regional nature of the analysis, unknown site conditions and lack of project-specific details, it is unclear whether these impacts could be mitigated to less than significant. Therefore, impacts to wildlife movement/corridors are determined to be significant and unavoidable.

The term “wildlife” refers to all terrestrial and aquatic animals. PMM-BIO-4 differentiates between wildlife corridors and wildlife crossings, such as culverts, by referring to wildlife crossings as habitat linkages which are to be implemented to promote wildlife movement between corridors where linkages do not exist.

RESPONSE ORG 5-33

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.22 LETTER ORG 6: FRIENDS OF HARBORS, BEACHES, AND PARKS

Michael Wellborn, President
Friends of Harbors, Beaches, and Parks
P.O. Box 9256
Newport Beach, CA 92658-9256

January 3, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001688** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 6-1

SPM updates were updated as part of the Final Plan. Refer to **Response ORG 5-2**. Also refer to **Response ORG 5-27**, above, and **Master Response No. 5, Approach to Mitigation Measures**, regarding Plan features.

RESPONSE ORG 6-2

Conducting a study to examine the economic and fiscal benefits of natural and agricultural lands preservation is not a mitigation measure. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above. Economic considerations are not treated as significant effects on the environment under CEQA. The focus of CEQA is on physical changes in the environment.

8.6.23 LETTER ORG 7: HILLS FOR EVERYONE

Claire Schlotterbeck, Executive Director
Hills For Everyone
P.O. Box 9835
Brea, CA 92822-1835

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission IDs 0001763** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 7-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses ORG 7-2 to ORG 7-6**, below, for responses to the individual comments contained herein.

RESPONSE ORG 7-2

The RAMP is indeed included as a Plan Implementation Strategies and Regional Strategic Investment in the Plan. Also refer to **Responses ORG 5-11 and ORG 5-27**, above.

RESPONSE ORG 7-3

Also refer to **Response ORG 5-2**, above.

RESPONSE ORG 7-4

Also refer to **Master Response No. 5, Mitigation Measures**, above, regarding Plan features. Also refer to **Response ORG 5-3**.

RESPONSE ORG 7-5

Also, see **Master Response No. 2, General Comments and Non-CEQA Issues**, above. The commenter's support for the Greenprint program is acknowledged, but this comment does not raise any specific comments regarding the 2024 PEIR or its contents. No further response is necessary.

RESPONSE ORG 7-6

Also refer to **Response ORG 5-8**, above.

RESPONSE ORG 7-7

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. No further response is necessary.

8.6.24 LETTER ORG 8: NATURAL LANDS COALITION

Natural Lands Coalition

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission IDs 0001753 and 0001755** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 8-1

As discussed in Section 3.4, *Biological Resources*, of the 2024 PEIR, PMM-BIO-4 provides an extensive list of various measures to be considered by CEQA lead agencies for implementation, all of which are intended to address impacts to wildlife corridors and wildlife movement. Through the SoCal Greenprint, data on these assets will be available to implementing agencies, conservation groups, researchers, and developers (consistent with the SoCal Greenprint Data Standards and updates to the SCAG's RAMP Policy Framework, adopted by SCAG Regional Council on February 1, 2024). Refer to **Submission ID 0001753.19** for additional information.

RESPONSE ORG 8-2

Also refer to **Response ORG 4-1**, above.

RESPONSE ORG 8-3

Also refer to **Response ORG 4-1**, above.

RESPONSE ORG 8-4

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above. The commenter's suggested additions to the Plan's Implementation Strategies are acknowledged. Refer to the Land Use and Communities Technical Report, which includes the following Implementation Strategies:

- Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protection of wetlands, habitat and wildlife corridor restoration, greenway connectivity and similar efforts
- Develop partnerships and programs to support local and regional climate adaptation, mitigation and resilience initiatives;
- Research existing and potential options to fund the climate resilience efforts of implementation agencies;
- Continue efforts to support partners to identify priority conservation areas—including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection;
- Collaborate with partners to foster adoption of alternative groundwater recharge technologies, stormwater capture systems, urban cooling infrastructure and greywater usage systems that can reduce water demand and/or increase water supply.

- Work with implementation agencies to support, establish, or supplement voluntary Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review Process

SCAG's recently adopted Regional Advance Mitigation Program Policy Framework further establishes goals of the Regional Council related to RAMP and defines SCAG's role.

In addition, the PEIR identifies numerous specific measures to reduce VMT and GHG emissions as well as reduce impacts to agricultural lands and address climate resiliency at both the regional level (by SCAG) and at the project level. Also, as shown in Table 3.8-6, many municipalities in the region have climate action plans and/or related policies.

RESPONSE ORG 8-5

Also refer to **Master Response No. 5, Mitigation Measures**, above. Also refer to **Response ORG 5-3**.

RESPONSE ORG 8-6

SCAG acknowledges the commenter's support for mitigation measures SMM-AG-2 and SMM-AG-3. No further response is necessary.

RESPONSE ORG 8-7

Refer to **Master Response No. 5, Mitigation Measures** and **Response ORG 5-27**, above. The Plan includes transportation investments that would result in, among other things, lower VMT and GHG emissions, as noted by the commenter. SCAG acknowledges the commenter's suggestions regarding the creation of a program similar to RAMP that specifically addresses VMT and GHG emissions, however, that is the goal of the entire Plan and a separate program would not be appropriate at the regional scale. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail in the 2024 PEIR.

RESPONSE ORG 8-8

Refer to **Master Response No. 5, Mitigation Measures**, above. SMM-BIO-1 requires SCAG to support research, programs, and policies, as well as facilitate information sharing to preserve wildlife corridors and wildlife crossings. To the extent that SCAG's support provides opportunities for preservation agencies and land trusts/conservation groups, as suggested by the commenter, the mitigation is supportive of this approach.

Also refer to **Response ORG 5-2** regarding SPM modeling updates under the Final Plan and **Response ORG 5-3** regarding suggestions for the Greenprint tool.

8.6.25 LETTER ORG 9: RAIL PASSENGERS ASSOCIATION OF CALIFORNIA

Brian Yanity
Rail Passengers Association of California

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001697** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 9-1

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above. The Project List referenced by the commenter is provided in the Project List Technical Report. This comment does not raise a specific issue regarding the 2024 PEIR or the analysis contained therein. As such, no further response is necessary.

8.6.26 LETTER ORG 10: ROBERT REDFORD CONSERVANCY FOR SOUTHERN CALIFORNIA SUSTAINABILITY

Susan A. Phillips
Director, Robert Redford Conservancy for Southern California Sustainability

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001757** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 10-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses ORG 10-2 to ORG 10-4**, below, for responses to the individual comments contained herein.

RESPONSE ORG 10-2

As noted in Section 8.1.2 above, the 2024 PEIR was released for a 65-day public review and comment period that started on Thursday, November 9, 2023, and ended on Friday, January 12, 2024. The NOA for the 2024 Draft PEIR, which included a link to the 2024 Draft PEIR document on SCAG's website at <https://scag.ca.gov/peir>, was uploaded to and filed with the Governor's Office of Planning and Research (OPR) CEQA submit Database on November 9, 2023. In addition, the NOA was posted with each of the County Clerks for the six counties in the SCAG region. The NOA and the 2024 Draft PEIR were distributed primarily using electronic mail to more than 7,900 interested parties including representatives of Native American tribes, federal, state, regional and local government agencies, and other interested agencies, organizations, and individuals. A summary of the NOA was published on SCAG's website as well as in 13 newspapers. Hard copies of the NOA were also mailed directly to approximately 171 interested parties, including federal, state, regional and local agencies, organizations using the U.S. Postal Service certified mail service and first-class mail, as appropriate, and additional hard copies of the NOA (separate versions in five languages) were sent via certified mail to 68 major libraries in the region. Hard copies of the NOA and 2024 Draft PEIR were also available at all six of the SCAG Regional Office locations.

This comment does not provide any specific comments regarding the Draft 2024 PEIR or its contents. No further response is necessary.

RESPONSE ORG 10-3

Also refer to **Response ORG 5-11** regarding SoCal Greenprint, and **Master Response No. 2, General Comments and Non-CEQA Issues**, above. The commenter's opinions do not offer any evidence of interference in the CEQA process. The comments regarding data transparency as relates to the Greenprint tool do not raise any specific issues regarding how the stated data transparency concern affects the analysis presented in the 2024 PEIR. Therefore, no further response is necessary.

RESPONSE ORG 10-4

Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above. The commenter's opinions do not raise a specific issue regarding the 2024 PEIR or the analysis contained therein. As such, no further response is necessary.

8.6.27 LETTER ORG 11: RIVERSIDE NEIGHBORS OPPOSING WAREHOUSES

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

December 5, 2023

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001676** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 11-1

As noted in Section 8.1.2 above, the 2024 PEIR was released for a 65-day public review and comment period that started on Thursday, November 9, 2023, and ended on Friday, January 12, 2024. The NOA for the 2024 Draft PEIR, which included a link to the 2024 Draft PEIR document on SCAG's website at <https://scag.ca.gov/peir>, was uploaded to and filed with the Governor's Office of Planning and Research (OPR) CEQA submit Database on November 9, 2023. In addition, the NOA was posted with each of the County Clerks for the six counties in the SCAG region. The NOA and the 2024 Draft PEIR were distributed primarily using electronic mail to more than 7,900 interested parties including representatives of Native American tribes, federal, state, regional and local government agencies, and other interested agencies, organizations, and individuals. A summary of the NOA was published on SCAG's website as well as in 13 newspapers. Hard copies of the NOA were also mailed directly to approximately 171 interested parties, including federal, state, regional and local agencies, organizations using the U.S. Postal Service certified mail service and first-class mail, as appropriate, and additional hard copies of the NOA (separate versions in five languages) were sent via certified mail to 68 major libraries in the region. Hard copies of the NOA and 2024 Draft PEIR were also available at all six of the SCAG Regional Office locations. Additionally, SCAG staff provided assistance to the commenter in locating the documents. This comment does not provide any specific comments regarding the Draft 2024 PEIR or its contents. No further response is necessary.

RESPONSE ORG 11-2

Also refer to **Response ORG 11-1** above.

RESPONSE ORG 11-3

Also refer to **Response ORG 11-1** above. Connect SoCal 2024 is not a CEQA document, it is the subject of the 2024 PEIR and is summarized in Chapter 2, *Project Description*. It is not an appendix or attachment to the 2024 PEIR but is a stand-alone document; as such, it is not included among the CEQA document files included in the CEQAnet database. All Plan documents, public comments, public hearing comments for Connect SoCal 2024 are part of the administrative legal record (Record of Proceedings) for the PEIR. This comment does not raise a substantive comment on the 2024 PEIR or the analysis provided therein, and thus no further response is necessary.

8.6.28 LETTER ORG 12: RIVERSIDE NEIGHBORS OPPOSING WAREHOUSES

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

January 10, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001829** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 12-1

Refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, and **Master Response No. 6, Alternatives**. The region-level growth forecast was also utilized for the baseline scenario (No Project Alternative), and this forecast was based on local agency input regarding anticipated growth within each respective jurisdiction. As such, the forecasted growth was based on the most up-to-date planning inputs. No other growth scenarios, including a declining population growth scenario, were considered for analysis. Refer to Plan **Submission IDs 1829.01.1 through 1829.01.3** for more information.

RESPONSE ORG 12-2

Refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**. As discussed in detail in Plan **Submission IDs 1829.01.1 through 1829.01.3**, the commenter's suggestion that the projections for Connect SoCal 2024 indicate growth trends are contradictory to the projections of other agencies is not supported by evidence, as SCAG's forecasts are based on local input and a panel of experts who review all available data including other agency forecasts. CEQA allows for environmental documents to include data and/or analyses where experts may differ. In this case, SCAG staff have reviewed the data in the comment and continue to believe the forecast included in the Plan and PEIR represents a conservative and appropriate basis for regional planning and CEQA analysis.

RESPONSE ORG 12-3

Also refer to **Response ORG 12-2**.

RESPONSE ORG 12-4

Refer to Plan **Submission IDs 1829.01.1 through 1829.01.3** regarding the differences between growth projections of other agencies and the SCAG growth forecast developed for Connect SoCal 2024. In addition, see **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above.

RESPONSE ORG 12-5

Also refer to **Response ORG 12-1**, above, regarding growth scenarios considered in the 2024 PEIR Alternatives analysis.

RESPONSE ORG 12-6

Refer to **Master Response No. 6, Alternatives**, regarding the range of alternatives evaluated in the 2024 PEIR, and **Responses ORG 4-2 and ORG 12-1** regarding consideration of a declining population scenario in the Plan and 2024 PEIR.

RESPONSE ORG 12-7

Also refer to **Responses ORG 12-1 and ORG 12-2** above and **Master Response No. 2, General Comments and Non-CEQA Issues**, above. The commenter's opinions do not raise any substantive issues regarding the 2024 PEIR or the analysis it contains. No further response is necessary.

8.6.29 LETTER ORG 13: RIVERSIDE NEIGHBORS OPPOSING WAREHOUSES

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

January 10, 2024

This letter includes comments on both the Plan and 2024 PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission IDs 0001822 and 0001823** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 13-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses ORG 13-2 to ORG 13-80**, below, for responses to the individual comments contained herein.

RESPONSE ORG 13-2

The commenter requests that SCAG apply policies related to passenger vehicles to reduce VMT from the goods movement and logistics sector. The Connect SoCal 2024 Goods Movement Technical Report includes a discussion of regional goods movement systems, including trucking and their relationships to industrial and retail facilities; global and national supply chains; local and national consumptions; regulatory frameworks; technology transitions, and community impacts. A more compact growth pattern will not only reduce passenger vehicle VMT but would also reduce local goods movement VMT as trucks would be able to be more efficient in deliveries to the local population. However, many of the longer truck trips are necessary and related to the regional, state and national economies. The Plan includes policies focusing on goods movement and EJ including regional policies and implementation strategies for advancing and supporting deployment of zero-emissions and clean technologies. The Implementation Strategies for goods movement include strategies that would improve air quality and reduce emissions and support infrastructure including engaging with communities throughout the SCAG region on environmental justice concerns, economic needs, and workforce development priorities, and continuing to coordinate with federal and state partners on goods movement planning efforts. Thus, Connect SoCal 2024 provides appropriate regional-scale goals, policies, and implementing strategies to reduce the environmental impacts and emissions in the goods movement and logistics sector. Also refer to Plan **Submission ID 0001822.02**.

RESPONSE ORG 13-3

The comment summarizes the commenter's concerns with respect to some of the impacts from goods movement and the logistics sector as relates to air quality. The comment does not disagree with any of the analyses in the 2024 PEIR nor request any clarifications or revisions. Refer to Plan **Submission ID 0001822.03**.

In addition to evaluating the environmental effects and impacts of Connect SoCal 2024, the 2024 PEIR also includes programmatic mitigation measures (for SCAG and project-level measures) to avoid or lessen the severity of potentially significant impacts, and residual impacts. Also refer to **Master Response No. 5, Approach to Mitigation Measures**, above.

RESPONSE ORG 13-4

The comment does not disagree with any of the analyses in the 2024 PEIR nor request any clarifications or revisions. Plan-related impacts to housing are discussed in Section 3.14, *Population and Housing*, of the 2024 PEIR. Refer to **Master Response No. 1, Comments Related to Connect SoCal 2024**, regarding comments regarding the Plan's housing-related policies and strategies, and **Master Response No. 2, General Comments and Non-CEQA Issues**, regarding the commenter's opinions about goods movement land uses being a nuisance to other uses and the competition between residential and goods movement-related uses for land in the region.

RESPONSE ORG 13-5

With respect to the requested policies to promote environmental justice in the equitable distribution of the goods movement and logistics sector, as noted above the Plan already includes appropriate policies and strategies focused on goods movement including addressing EJ issues, and therefore the suggested additional policies would not further reduce emissions or address local-level decision-making; refer also to **Master Response No. 1, Comments Related to Connect SoCal 2024**. EJ issues are not environmental issues under CEQA; however, related issues are addressed throughout the 2024 PEIR, where appropriate, as noted above in **Response ORG 13-2**. Also refer to Plan **Submission ID 0001822.05**,

RESPONSE ORG 13-6

The comment does not disagree with any of the analyses in the 2024 PEIR nor request any clarifications or revisions. Plan-related impacts to transportation are discussed in Section 3.17, *Transportation*, of the 2024 PEIR. Refer to Plan **Submission ID 0001822.06**. As noted therein, SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. In addition, the Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward, as well as refining SCAG's data and analysis of truck routes and truck travel patterns and impacts to infrastructure such as on pavement as suggested by the commenter. The commenter's assertions regarding the percentage of truck and rail traffic dedicated to goods movement versus passenger travel impinging on the Plan's mobility goals, potential damage to infrastructure, and congestion associated with increased goods movement are not supported by evidence and furthermore, do not raise any specific issues related to the 2024 PEIR. Refer to Section 3.17 for a discussion of impacts and mitigation measures regarding the Plan's impacts associated with mobility and transportation facilities and infrastructure in the region.

RESPONSE ORG 13-7

The SCS identifies regional planning policies and strategies, including policies and strategies that specifically address goods movement, to reduce per capita automobile and light-duty truck GHG emissions pursuant to SB 375. SCAG has no authority to regulate growth including specifically in the goods movement and logistics sector. The commenter cites the 2024 PEIR as one of his sources for identifying his concerns. The comment does not disagree with any of the analyses in the 2024 PEIR nor request any clarifications or revisions. Plan-related GHG impacts are discussed in Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR. Refer to **Response ORG 13-2**, above, regarding the Plan's policies affecting goods movement, including those that address GHG emissions.

RESPONSE ORG 13-8

Also refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, regarding how the Plan and 2024 PEIR identifies a development pattern for purposes of analysis. The commenter cites the 2024 PEIR as one of his sources for identifying his concerns. The comment does not disagree with any of the analyses in the 2024 PEIR nor request any clarifications or revisions. Plan-related impacts to land use patterns are discussed in Section 3.11, *Land Use and Planning*, of the 2024 PEIR. Refer to **Response ORG 13-2**, above, regarding the Plan's policies affecting goods movement and SCAG's lack of land use authority to address localized issues regarding balancing warehouse development and existing housing stock and addressing existing and future housing needs.

RESPONSE ORG 13-9

The comment does not disagree with any of the analyses in the 2024 PEIR nor request any clarifications or revisions. Plan-related impacts to land use patterns are discussed in Section 3.11, *Land Use and Planning*, of the 2024 PEIR. Refer to Plan **Submission ID 0001822.09**. As noted in the Plan response, SCAG is not an implementing agency and thus has no land use authority; as such, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG does, however, work with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. SCAG considers the input received through the LDX process in the modeling and assumptions for the Plan, and as such the Plan incorporates such input regarding land uses within each respective member agency jurisdiction. To the extent that goods movement-related uses are included in the growth projections and forecasted development pattern, these uses are anticipated in the Plan to be developed according to local land use plans. SCAG does not prescribe goods movements facilities in any particular location or part of the region, but rather this is driven by market forces and other considerations and is ultimately at the discretion of each lead agency. Nonetheless, the Plan encourages a more compact development pattern with a focus on development within areas that are already disturbed, urbanized, have access to services and facilities, and lack sensitive resources. In this manner, the Plan would not encourage logistics sprawl as suggested by the commenter, but rather would reduce impacts to habitat (and associated connectivity) and other sensitive resources by concentrating development away from these areas.

RESPONSE ORG 13-10

Refer to Plan **Submission ID 0001822.10.1**, and **Response ORG 13-9**, above. SCAG does not have any authority to restrict growth in the logistics and goods movement sector such that heavy duty truck VMT could be limited in proportion to population growth. The Plan's policies and programs are intended to increase efficiency and lower emissions associated with goods movement in the region, but the pace of development in this sector is driven by market forces and local land use decisions, over which SCAG has no control. SCAG will, however, continue to partner with local member agencies and organizations to improve goods movement efficiency and facilitate continued reductions in truck VMT and GHG emissions while maintaining a robust regional economy.

RESPONSE ORG 13-11

Refer to Plan **Submission ID 0001822.10.2**, and **Response ORG 13-10**, above, regarding SCAG's lack of authority to dictate land use decisions including facilitating infill warehouse and goods movement developments in coastal areas closer to the ports,

RESPONSE ORG 13-12

Refer to Plan **Submission ID 0001822.10.3** and **Response ORG 12-2** and **Response ORG 13-10**, above, regarding SCAG's lack of authority to dictate land use decisions including facilitating infill warehouse and goods movement developments in coastal areas,

RESPONSE ORG 13-13

Refer to Plan **Submission ID 0001822.10.4** and **Response ORG 13-9**, above, regarding Plan policies that discourage "logistics sprawl" and SCAG's lack of land use authority to affect local development decisions regarding goods movement facilities in the region.

RESPONSE ORG 13-14

Refer to Plan **Submission ID 0001822.10.5**, As noted therein, the Plan accounts for the movement of people as well as goods, as both are needed for the region to thrive, and thus it attempts to balance competing priorities to meet the needs of the region. With respect to planning for people, the Plan describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region. The Mobility Technical Report details strategies (e.g., dedicated bus lanes, mobility hubs, first/last mile connections, etc.) and investments (e.g., Metrolink's SCORE Program, California High Speed Rail, etc.) that support growth towards this transportation vision. Plan-related impacts to transportation are discussed in Section 3.17, *Transportation*, of the 2024 PEIR.

RESPONSE ORG 13-15

Refer to **Responses ORG 13-2 and ORG 13-10**, above, regarding the Plan's policies affecting goods movement and SCAG's lack of land use authority to address conflicts between the perceived "goods movement exceptionalism" cited by the commenter and localized land use and planning considerations.

RESPONSE ORG 13-16

Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above, regarding the socio-economic issues raised in the comment. With regard to regulatory requirements as a partner in managing regional air quality, as discussed on 2024 PEIR pages 3.3-39 through 3.3-41, SCAG coordinates with air districts in the region to ensure that air quality planning and air quality management plans (AQMPs) (and air pollution control plans) are consistent and comprehensively address air pollution from all sources (as appropriate) in the SCAG region. Upon approval by the USEPA, the motor vehicle emissions budgets in the applicable AQMPs and State Implementation Plans (SIPs) will become the functioning emission caps for transportation conformity for future RTPs, Federal Transportation Improvement Programs, and amendments or updates to such plans/programs. SCAG's role in the air quality plan development process includes providing the socio-economic growth forecast and regional transportation demand model output data for use in estimating and forecasting emission inventories and airshed

modeling and providing vehicle activity data to CARB for use in developing on-road emissions. SCAG provided this data to the respective agencies. Thus, Connect SoCal 2024 considers various regulatory requirements as a partner in managing regional air quality with its partner agencies. While heavy duty VMT is showing increases over the life of the Plan (refer also to **Master Response No. 4, Regional Development Pattern and growth Forecast**), Connect SoCal 2024 shows the region meeting federal conformity requirements as well as the requirements of SB 375. Furthermore, consistent with the CEQA Guidelines and Statutes and consistent with established CEQA case law, the 2024 PEIR for Connect SoCal 2024 identifies program-wide measures for implementation by SCAG for environmental issues areas including aesthetics, air quality, biological resources, GHG emissions, land use and planning, noise, population and housing, and transportation. Also refer to **Response ORG 13-2** regarding additional policies/mitigation focused on heavy-duty trucks and **Master Response No. 5, Approach to Mitigation Measures**, above.

RESPONSE ORG 13-17

Refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, regarding the Forecasted Regional Development Pattern.

The SCS identifies regional policies and strategies to reduce per capita automobile and light-duty truck GHG emissions. Further, as discussed above in **Response ORG 13-2**, SCAG has no authority to regulate growth including industrial development in the goods movement and logistics sector. Cost is a major consideration for where industrial development occurs. Further restricting this type of growth throughout Southern California may lead to unintended consequences as development would likely occur in Central California, Southern Nevada, and Arizona to support local consumption and increasing industrial sprawl further including truck VMT through the SCAG region to these areas and back-haul trips coming back into the SCAG region. The California Air Resources Board and South Coast AQMD have established regulations and rules for zero-emission medium- and heavy-duty trucks and SCAG is supporting this transition notably through its Last Mile Freight Program. Additionally, SCAG will be developing a Comprehensive Sustainable Freight Plan that will assess supply chain relationships both locally and nationally, including industrial facility development for retail/wholesale, manufacturing, transportation/warehousing, and other goods movement industries. This Plan will be coordinated across state and local agencies, as well as with industry and community stakeholders.

Regarding ambient air quality ozone standards, the Plan does not undermine attainment of the ozone standards. As discussed on pages 3.3-39 and 3.3-40 of the 2024 PEIR, the Plan is required to meet federal transportation conformity requirements. To achieve this requirement, SCAG coordinates with air districts in the region to ensure that AQMPs (and air pollution control plans) are consistent and comprehensively address air pollution from all sources (as appropriate) in the SCAG region. SCAG provides air districts with socio-economic growth forecast and regional transportation demand model output data for the air districts' use in estimating and forecasting emission inventories and airshed modeling. The motor vehicle emissions budgets in the applicable AQMPs/SIPs become the functioning emission caps for transportation conformity for future RTPs. The Plan affirmatively demonstrates achievement of the four required transportation conformity tests, namely: (1) regional emissions analysis; (2) fiscal constraint; (3) timely implementation of Transportation Control Measures; and (4) interagency consultation and public involvement. Therefore, the Plan achieves its part for attainment of the ozone standards.

Regarding California's GHG goals, as discussed on pages 3.8-61 through 3.3-69 in Section 3.3, *Air Quality*, of the 2024 PEIR, Assembly Bill (AB) 32 and Senate Bill (SB) 32 are statewide GHG reduction goals aimed at reducing emissions to 1990 levels by 2020 and reducing emissions to at least 40 percent below 1990 levels by 2030,

respectively. However, both CARB and the Office of Planning and Research (OPR) have acknowledged that MPOs are tasked with meeting SB 375 per capita GHG emissions reduction targets. The Plan affirmatively demonstrates achievement of the per capita GHG emissions reduction targets as set by CARB for the SCAG region. Thus, the Plan meets its statutorily required SB 375 targets for the SCAG region, and as such, the Plan has contributed its regional share towards reducing GHG emissions set forth in AB 32 and SB 32.

The Plan does not include strategies or show GHG reductions for all the AB 32 and SB 32 Scoping Plans strategies that address a broad range of economic sectors. SCAG has no control or authority over other key sectors whose GHG emission reductions are needed to meet the State's climate goals. Nonetheless, while SCAG has no authority over projects in the Connect SoCal 2024 Plan or any land use authority and has no authority to regulate growth in the goods movement and logistics sector, consistent with the CEQA Guidelines and Statutes and consistent with established CEQA case law, the PEIR for Connect SoCal 2024 identifies programmatic mitigation measures for implementation by SCAG that address issues related to logistics sprawl and associated environmental impacts, including, for instance, SCAG Mitigation Measure SMM-LU-1 on PEIR page 3.11-28 that requires SCAG to continue to coordinate with Caltrans and local transportation agencies. With regards to air quality planning and emissions in the region, SCAG Mitigation Measure SMM-AQ-1 on page 3.3-43 provides that SCAG shall continue to support and inform regional air quality planning and continue to coordinate with various agencies and stakeholders through regional collaboration forums. identifies programmatic measures for implementation by SCAG. Also refer to **Master Response No. 5, Approach to Mitigation Measures**, above.

RESPONSE ORG 13-18

Refer to **Response ORG 13-2** and **Master Response No. 1, Comments Related to Connect SoCal 2024**, above, regarding the commenter's suggestions for Plan policies and mitigation measures restricting growth in the goods movement sector. Also refer to Plan **Submission ID 0001822.16** regarding the Plan's federal transportation air quality conformity requirements, SCAG's lack of land use authority, and SCAG programs that support emissions reductions in the logistics and goods movement sector.

The comment does not disagree with the analysis of the 2024 PEIR. The 2024 PEIR evaluates the environmental effects of air pollution including from the goods movement industry and associated diesel trucks. Page 3.3-3 and 3.3-4 of the 2024 PEIR discusses diesel particulate matter in detail and states that, according to the CARB, most toxic air emissions are from motor vehicles and the particulate matter from the exhaust of diesel-fueled engines. In addition, according to the Office of Environmental Health Hazard Assessment, 70 percent of cancer risk from breathing toxic air pollutants stem from diesel exhaust particles for the average Californian. Pages 3.3-5 through 3.3-8 of the 2024 PEIR describes the air quality conditions of the air basins within the SCAG region, which include the Mojave Desert Air Basin, Salton Sea Air Basin, South Central Coast Air Basin, and South Coast Air Basin. Particulate matter and ozone pollution issues in these air basins within the SCAG region are further described and disclosed on pages 3.3-8 through 3.3-13 of the Draft PEIR, including the disclosure that pollution from exposure to heavy truck traffic emissions contributes to adverse human health impacts. The air pollutant non-attainment status within the SCAG region with respect to the NAAQS as set by the USEPA identified in Table 3.3-4, 2023 Nonattainment Areas in the SCAG Region for All Criteria Pollutants by County by NAAQS. The nonattainment status with respect to the CAAQS as set by CARB are identified in Table 3.3-6, CAAQS Area Designations. As shown therein, the SCAG region is generally described as being in nonattainment for ozone and particulate matter pollution. A nonattainment designation for the areas described in Tables 3.3-4 and 3.3-5 means that the area does not meet the applicable based ambient air quality standard (NAAQS and/or CAAQS) for the pollutant. The standards are set based on scientific evidence to be protective of health and welfare with a margin of safety. The

2024 PEIR discusses on-road mobile source air pollutant emissions on pages 3.3-53 through 3.3-55 for SCAG’s six-county region (see Table 3.3-14, On-Road Mobile Source Criteria Air Pollutant Emissions by County—Existing Condition (2019) vs Year 2030, 2040, and 2050 Plan). As discussed therein, emissions are expected to result in a declining trend in future years compared to existing conditions (2019) except a slight increase in PM10 emissions in 2050 in Imperial and Riverside County. In part, the declining trend is due to vehicle emissions reductions required by federal and states rules and policies (see Section 3.3.2, *Regulatory Framework*, in Section 3.3, *Air Quality*, of the 2024 PEIR for additional information). While it is reasonable to assume that technological advances will incrementally reduce emissions for all sectors through the Plan horizon, it is speculative to assume that goods movement activities and associated emissions would outpace the emissions reductions such that these technological benefits would be “undermined” or negatively offset by goods movement growth. In addition, as noted above in **Response ORG 13-2**, SCAG has no ability to restrict growth in any particular sector, including goods movement, and has no land use authority to affect the nature and location of land uses in the region. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail in the 2024 PEIR.

RESPONSE ORG 13-19

This comment provides an introductory statement regarding the comments directed at Section 3.3, *Air Quality*, of the 2024 PEIR and associated appendices that are provided in this letter. Also refer to **Responses ORG 13-20 to ORG 13-50**, below, for responses to the individual comments contained herein.

RESPONSE ORG 13-20

As defined by the U.S. Environmental Protection Agency (USEPA), “[Air] Dispersion modeling uses mathematical formulations to characterize the atmospheric processes that disperse a pollutant emitted by a source. Based on emissions and meteorological inputs, a dispersion model can be used to predict concentrations at selected downwind receptor locations.”¹⁴ The health risk assessment and the nitrogen deposition assessment were performed for CEQA purposes in Section 3.3, *Air Quality*, of this PEIR, and both assessments utilized air dispersion modeling. Therefore, definition of air dispersion is needed and is accurate as defined in Section 3.3, and no text changes are warranted.

RESPONSE ORG 13-21

The units described in the comment are related unit conversions of the units used in Section 3.3, *Air Quality*. As shown in Table 3.3-3 of this PEIR, units such as ppm, ppb, and $\mu\text{g}/\text{m}^3$ are commonly used by federal, state, and local air regulators (e.g., US EPA, CARB, and South Coast AQMD). Also refer to the US EPA Nonattainment Areas for Criteria Pollutants (Green Book) at: <https://www.epa.gov/green-book>. Concentration values used in Section 3.3 can be converted to preferred units and no text changes are warranted.

¹⁴ USEPA, Support Center for Regulatory Atmospheric Modeling (SCRAM) – Air Quality Dispersion Modeling, <https://www.epa.gov/scram/air-quality-dispersion-modeling#:~:text=Dispersion%20modeling%20uses%20mathematical%20formulations,at%20selected%20downwind%20receptor%20locations.>, last updated December 13, 2023.

RESPONSE ORG 13-22

The use of subscripts is consistent with SCAG's style guide that is also applied throughout for Connect SoCal 2024. The removal of subscripts for certain chemical symbols does not unreasonably prohibit or change understanding of the information provided. Therefore, no text changes are warranted.

RESPONSE ORG 13-23

As correctly stated in Section 3.3, *Air Quality*, of the 2024 PEIR, industrial sources are one of the primary sources of ROG and NO_x, the components of ozone. Examples of industrial sources include, but not limited to, major facilities such as refineries and landfills, as well as off-road equipment (e.g., generators and boilers) that require air permits from local air agencies. Refer to Chapter 9, Section 9.3, for the text revisions to the definition of ozone (O₃) on page 3.3-2 in Section 3.3.

RESPONSE ORG 13-24

The comment does not specifically describe the inadequacy of the descriptions of the pollutants and associated health effects in Section 3.3, *Air Quality*. The descriptions of the pollutants and associated health effects are based on cited sources within each bullet describing the pollutants on pages 3.3-1 through 3.3-4 and the 2024 PEIR is not required to use the description from a specific source. In addition, the definitions are intended to provide basic and qualitative understanding of the pollutants' associated health effects. However, since SCAG used a quantitative approach for both the health risk assessment and the Friant Ranch health impacts to analyze and disclose the Plan's potential impacts on cancer risk and health implications, the descriptions of pollutants' associated health effects are adequate and appropriate for CEQA purposes. Furthermore, the current analysis already considers impacts to be significant and mitigation measures are required; additional analysis would not change the determination. Therefore, no text changes are warranted.

RESPONSE ORG 13-25

Refer to **Response ORG 13-24**, above. Moreover, the health risk assessment conducted in this PEIR followed the 2015 Office of Environmental Health Hazard Assessment (OEHHA) HRA Guidelines for carcinogenic and noncarcinogenic exposures to air toxics. This is consistent with the recommendations from the California Air Resources Board (CARB) and the California Air Pollution Control Officers Associations (CAPCOA) on risk management and assessment using the inhalation pathway (<https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-risk-assessment>). It is important to note that CAPCOA is a nonprofit association of the air pollution control officers from all 35 air quality agencies throughout California. For more information on CAPCOA, please visit <https://ww2.arb.ca.gov/taxonomy/term/154>.

RESPONSE ORG 13-26

The USEPA's National Scale Assessment on page 3.3-3 of Section 3.3, *Air Quality*, was mentioned to describe potential exposure sources and pathways of DPM/diesel exhaust and how DPM/diesel exhaust contribute to health risk. The USEPA's National Scale Assessment provided modeling estimates of population exposures and described exposure sources of DPM being from both on road and off-road engine exhaust that is either directly emitted from the engines or aged through lingering in the atmosphere. The location of the study being in New England does not reduce its relevance and does not require updating to sources from Southern California. Therefore, no text changes are warranted.

RESPONSE ORG 13-27

The reference to the 2006 24-hour PM_{2.5} National Ambient Air Quality Standard (NAAQS) is appropriate. For example, as discussed in Connect SoCal 2024 Transportation Conformity Analysis Technical Report, the South Coast Air Basin is a federal designated nonattainment area for the 2006 24-hour PM_{2.5} NAAQS. Refer to Chapter 9, Section 9.3, for the text revisions to the 2012 annual PM_{2.5} NAAQS references on pages 3.3-4 and 3.3-10 in Section 3.3, *Air Quality*.

RESPONSE ORG 13-28

The information about the American Lung Association's State of the Air Report 2023 is intended to provide general information on the physical environmental conditions as related to air quality consistent with CEQA Guidelines Section 15125. In addition, this comment does not raise a substantive issue regarding the 2024 PEIR air quality analysis provided therein. Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE ORG 13-29

Refer to Chapter 9, Section 9.3, for the resulting text revisions to the table reference on page 3.3-9 and to the Table 3.3-2 table header on page 3.3-10.

RESPONSE ORG 13-30

While the CEQA baseline for this PEIR is 2019, it may vary among CEQA topics and may also depend on data availability. Such variance is allowed by CEQA. Here, Map 3.3-1 displays 2015-2017 PM_{2.5} concentrations because that is the latest available data from CalEnviroScreen 4.0. Refer to OEHHA's CalEnviroScreen 4.0 documentation, page 37.

RESPONSE ORG 13-31

Refer to Chapter 9, Section 9.4, for the resulting text revisions to the legend of Map 3.3-2 (refer also to Appendix J for updates to Plan maps that are included in the 2024 PEIR).

RESPONSE ORG 13-32

Refer to Section 3.3, *Air Quality*, subsection *Definitions*, which defines criteria air pollutants. Specifically, NO_x refers to both NO and NO₂ and, similarly, SO_x refer to SO₂ as well as the entire group of sulfur oxides. VOC is a precursor to PM formation in the atmosphere. Therefore, all pollutants mentioned are encompassed under the definitions set forth for criteria air pollutants within Section 3.3.

RESPONSE ORG 13-33

Refer to Chapter 9, Section 9.3, for the resulting table header and text revisions. Table 3.3-7 shows on-road transportation-related criteria pollutant emissions by County within the SCAG region whereas the 2022 AQMP includes additional emissions sources in the cited tons per day estimate. Figure ES-2 of the 2022 SCAQMD AQMP is consistent with Table 3.3-13 of the 2024 PEIR.

RESPONSE ORG 13-34

Data gathered at regulatory monitoring stations operated by federal, State, and local agencies are what inform a region's ambient air quality and State Implementation Plans (SIPs) purposes, help determine attainment status, validate air models, and inform CARB's decision-making processes. Regulatory air sensors are built and operated according to rigorous air quality monitoring regulations determined by both the EPA and CARB. Air sensors are regularly calibrated to ensure accuracy. PurpleAir and other consumer air monitoring products are not designed with the same tolerances as a regulatory monitor and are therefore less accurate representations of actual air quality indices. While these devices may be helpful for instantaneous air quality measurements for a localized area, such as a home, they are not useful for large-scale air quality planning or regulatory purposes.

RESPONSE ORG 13-35

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, and **Master Response No. 2, General Comments and Non-CEQA Issues**, above, regarding comments about SCAG business-as-usual policy on goods movement and opinions about SCAG's perceived inactivity on the issue. In addition, the commenter's assertion that the Plan will delay timely attainment of the NAAQS is not substantiated by any evidence. On the contrary, the Plan demonstrates positive transportation conformity determination by meeting the applicable federal transportation conformity requirements and regulations as discussed in the Connect SoCal 2024 Transportation Conformity Analysis Technical Report. As discussed on pages 3.3-39 through 3.3-41 of the 2024 PEIR, the Plan is not expected to conflict with or obstruct implementation of the existing applicable air quality plans for federal transportation conformity purposes.

RESPONSE ORG 13-36

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, and **Master Response No. 2, General Comments and Non-CEQA Issues**, above. In addition, the 2024 PEIR discloses the inhalation cancer health risk effects of air pollution including from the goods movement sector and associated diesel trucks. In particular, 2024 PEIR pages 3.3-15, 3.3-16, and 3.3-66 through 3.3-70 describes and discloses the cancer health risk analysis from mobile source (i.e., heavy-duty truck) diesel emissions for representative high traffic volume freeway corridor segments in the SCAG region. The results of the Plan show declining cancer health risk impacts, with nine of the 16 representative segments decreasing to below a risk of 100 in one million. Furthermore, the Plan meets its federal requirements for regional transportation conformity purposes. The Connect SoCal 2024 Transportation Conformity Analysis Technical Report includes a detailed analysis of all applicable transportation control measures (TCMs) in the SCAG region. TCMs, required for Serious and worse ozone nonattainment areas and Serious carbon monoxide nonattainment areas, are strategies to reduce emissions from on-road mobile sources. It should be noted, however, that measures and projects that use technology to reduce or control emissions—such as innovations in fuel formulation technologies, or the promotion of zero-emission vehicles, or of alternative fueled engines—cannot be considered TCM projects.

RESPONSE ORG 13-37

This PEIR uses the CEQA Guidelines recommended Appendix G for thresholds of significance in 20 resource topic areas. This usage is appropriate and consistent with the requirements under CEQA Guidelines Section 15064.7. As the CEQA Lead Agency for Connect SoCal 2024, SCAG has the discretion to determine the appropriate thresholds of significance to use for the environmental analysis in the 2024 PEIR.

The Plan's regional compliance with applicable air quality plans, including those to achieve the NAAQS, is discussed adequately in Section 3.3, *Air Quality*, Subsection Compliance with Federal Transportation Conformity Requirements and Compliance with Applicable Air Quality Plan for All Other Purposes, on pages 3.3-39 through 3.3-41, respectively. As discussed therein, at the regional level, the Plan meets the federal transportation conformity requirements and therefore, would not conflict with or obstruct applicable AQMPs, local SIPs, and air plans. Refer to the Connect SoCal 2024 Transportation Conformity Analysis Technical Report for analysis, reporting, and documentation of Plan's compliance with federal transportation conformity requirements.

Regarding individual transportation projects, federally supported individual transportation projects in PM nonattainment and/or maintenance are required to perform their own project-level conformity. The potential exists that individual transportation projects in the Plan could result in conflicts with or obstruction of implementation of applicable air quality plans to be deemed as projects of air quality concerns (POAQC). Therefore, impacts with regards to project-level conformity are considered significant and mitigation measures are required.

Therefore, Section 3.3, *Air Quality*, sufficiently discusses the Plan's ability to meet the federal transportation conformity requirements. In addition, Section 3.3 describes that the potential exists that individual transportation projects in the Plan could result in conflicts with or obstruction of implementation of applicable air quality plans, including those associated with achieving the NAAQS, and impacts with regards to project-level conformity are considered significant and mitigation measures are required. No text changes are warranted.

RESPONSE ORG 13-38

As discussed in Section 3.3, *Air Quality*, on page 3.3-37, the four potential construction scenarios were analyzed for years 2025, 2032, 2037, and 2050 to illustrate the future construction of various transportation projects and land use projects over the lifetime of the Plan, not 2019 existing conditions. This is because CEQA analyzes a project's incremental ("net new") impacts from a baseline, but it does not consider impacts already existing on the ground ("existing conditions") as project's impacts. In addition, as described on page 3.3-37, these specific analysis years were chosen for the following reasons: the year 2025 corresponds to the NAAQS attainment year for the 2012 annual PM2.5 federal standard (for serious nonattainment designation), the years 2032 and 2037 correspond to attainment years for the 2008 and 2015 8-hour ozone federal standards (for the extreme nonattainment designation), and the year 2050 is the Connect SoCal 2024 horizon year. No text changes are warranted.

RESPONSE ORG 13-39

The VMT per capita reduction is not a required metric used to evaluate the Plan's ability to meet the federal transportation conformity requirements pursuant to the federal Transportation Conformity Regulations as found in the federal Clean Air Act Section 176(c), 40 Code of Federal Regulation Part 93, and the USEPA Transportation Conformity Regulations. Plan consistency with regional transportation conformity requirements is discussed in Section 3.3, *Air Quality*, Impact AQ-1, page 3.3-39. Section 3.3 describes that the potential exists that individual transportation projects in the Plan could result in conflicts with or obstruction of implementation of applicable air quality plans, including those associated with achieving the NAAQS, and impacts with regards to project-level conformity are considered significant and mitigation measures are required. No text changes are warranted. Refer to responses to Letter ORG-12, above, for additional information regarding comments related to the Plan's demographics forecast.

RESPONSE ORG 13-40

Section 3.3, *Air Quality*, Table 3.3-15, refers to off-road mobile emissions sourced from the SCAQMD 2022 AQMP. As stated on page 3-1 of the SCAQMD 2022 AQMP, the off-road emissions inventories were provided by CARB.¹⁵ Pursuant to the California Health and Safety Code, SCAG is responsible for preparing a portion of the Air Quality Management Plan (AQMP) for the South Coast Air Basin relating to the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and transportation control measures (TCMs), which is commonly known as “Appendix IV-C” of the AQMP. SCAG’s role in the SCAQMD 2022 AQMP development process includes providing the socio-economic growth forecast and regional transportation demand model output data to the SCAQMD for use in estimating and forecasting emission inventories and airshed modeling; and vehicle activity data to the CARB for use in developing on-road emissions. In addition to the technical data, SCAG is also responsible for writing a portion of the 2022 AQMP on the region’s RTP/SCS and TCMs as they relate to air quality. Therefore, no text changes are warranted.

RESPONSE ORG 13-41

The level of detail in the air quality impacts analysis from construction activities is appropriate in the 2024 PEIR for Connect SoCal 2024, which is a long-range regional plan. Refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**. Section 3.3, *Air Quality*, adequately describes the speculative nature of accurately accounting for the quantity descriptions, locations, and scale of individual construction projects over the course of the 20+ year Plan project lifetime as describe on page 3.3-56. Further, the comment does not provide sufficient explanation of an adequate methodology to accurately estimate construction projects over the course of the Plan lifetime. Therefore, no text changes are warranted.

RESPONSE ORG 13-42

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, and **Master Response No. 2, General Comments and Non-CEQA Issues**, above. Further, the comment does not make a clear connection between the benefits of the Plan’s promotion of increased transportation, physical activities, and increased development of 15-minute communities and those policies being undermined by goods movement and does not raise a substantive issue regarding the 2024 PEIR or the analysis provided therein.

RESPONSE ORG 13-43

Refer to Plan **Submission ID 0001822.19** regarding Map 3.3-5 and the underlying data and analysis in the Plan. Map 3.3-5 in the 2024 PEIR reproduces a Plan map. Maps in the 2024 PEIR (and Plan) are based on underlying information including but not limited to the Growth Forecast, Project List, and/or other GIS resource data. The analyses in the 2024 PEIR are based on the underlying data not the maps. This map (Map 13 in the Equity Analysis Technical Report) is updated in the Final Plan to clarify the impact is the change between the 2050 Baseline and 2050 Plan scenarios and that the scale on the map indicates values on a scale from “worsen” to “improve,” where

¹⁵ SCAQMD. 2022a. *Air Quality Management Plan (AQMP)*. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>.

brown indicates worsening (increasing) emissions and blue/green indicates improving (lower) emissions. Refer to Appendix J for more information.

RESPONSE ORG 13-44

Refer to the Connect SoCal 2024 PEIR Appendix B-2: Technical Report for Health Risk Assessment and Supplemental NO₂ and N₂ Dispersion Modeling that provides information on the methodology associated with the health risk assessment (HRA) conducted to assess the potential cancer risk from roadway traffic associated with the growth of the region. As discussed in Appendix B-2, the one-mile portion modeled for each transportation segment represents the area of the segment with the densest number of sensitive receptors. The one-mile segment modeled yields the same results as if a longer portion were modeled assuming the properly scaled VMT. Furthermore, as explained in Appendix B-2, while the corridors ranged in length from 0.88 to 10.65 miles, the length is not critical to the evaluation because the maximum impact of diesel exhaust occurs very near (less than 500 meters) and perpendicular to the segment. As noted in the CARB's Air Quality and Land Use Handbook (2005), "[t]he risk at that distance for other freeways will vary based on local conditions—it may be higher or lower. However, in all these analyses the relative exposure and health risk dropped substantially within the first 300 feet." If the length of the segment is relatively longer than the distance to the impacted receptor in the air dispersion model, then the potential impact to a receptor will be the same regardless of the length of the segment. The highest impacts from the source will generally occur at the shortest distance from source to receptor; the length of the source relative to the distance to the receptor will ensure this happens. A segment at least 1,500 meters long (approximately one mile) is a longer distance than the distance from the source (e.g., roadway segment) to a receptor that is 500 meters away. Therefore, because the source is longer than the distance to the receptor (i.e., 1,500 meters source length versus 500 meters receptor distance), the potential impact to the receptor is virtually the same regardless of whether the segment analyzed was longer or shorter (given that the segment is at least 500 meters long). Note that most impacted receptors are generally located less than 500 meters away from major arterials and/or freeways. This distance from the source to impacted sensitive receptors is consistent with CARB's finding that the concentration of vehicle exhaust emissions is largely a factor of distance from source to receptor.¹⁶ The HRA evaluates the health risk posed to residential, worker, school children, day care, and retirement home receptors within 1,000 meters of the perimeter of the 16 freeway segments. According to CARB, there is a drop of 70 percent in particulate pollution concentrations at 500 feet (152 meters) from freeways and high-traffic roads.¹⁷

Section 3.3, *Air Quality*, page 3.3-15 explains DPM was modeled (as PM₁₀) because DPM is designated as carcinogen by the CARB. In addition, Appendix B-2 also explains DPM was the selected because DPM, which is emitted in the exhaust from diesel engines, was listed by the State as a toxic air contaminant (TAC) in 1998 and is used as a surrogate measure of exposure for all diesel exhaust emissions. It consists of PM_{2.5} (fine particles of a diameter less than 2.5 micrometer (µm)), a subgroup of ultrafine particles (diameter less than 0.1 µm), and a variety of gases and cancer-causing substances. This HRA uses emission rates from PM₁₀ (particles with a diameter of less than 10 micrometers, which also captures PM_{2.5}) to provide a metric consistent with the previous HRAs prepared for prior RTP/SCSs, and also to provide a conservative analysis.^{18,19} Therefore, since the 2024 PEIR HRA

¹⁶ CARB. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. Available online at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>, accessed October 16, 2023.

¹⁷ CARB. 2005. Air Quality and Land Use Handbook: A Community Health Perspective, California Air Resources Board. April.

¹⁸ SCAG, Impact Sciences, 2019. Appendix 3-3 Health Risk Assessment Technical Report: Diesel Exhaust Health Risk Assessment for the Southern California Association of Governments 2020 Connect SoCal Program Environmental Impact Report. December

¹⁹ PM₁₀ includes PM_{2.5} and therefore emission rates for PM₁₀ are higher than PM_{2.5} and provide a more conservative risk analysis.

provides substantial reasoning as substantial evidence in support of the choosing to model one-mile segments and using health risks associated with DPM as a surrogate for all health effects. It is also important to note that SCAG staff conducted informal interagency consultation with staff from the SCAQMD CEQA-Intergovernmental Review Program (IGR) and the VCAPCD CEQA Program on the 2024 PEIR's air quality technical analysis and modeling, including the HRA. The HRA was performed based on consideration of technical feedback from SCAQMD and VCAPCD staff.

RESPONSE ORG 13-45

Refer to **Response ORG 13-44**, above, regarding why the HRA evaluated the sensitive receptors within 1,000 meters of the perimeter of the modeled 16 freeway segments. As explained in Section 3.3, *Air Quality*, on page 3.3-36, the SCAQMD (2023b), VCAPCD (2003), MDAQMD (2016a), and AVAQMD (2016) have all recommended a maximum incremental cancer risk CEQA significance threshold of 10 in 1 million.²⁰ The accepted CEQA threshold is incremental, therefore the incremental health risk analyzed in the Connect SoCal 2024 PEIR Appendix B-2: Technical Report for Health Risk Assessment is sufficient. In addition, it is important to note that using cancer values from SCAQMD's Multiple Air Toxics Exposure Studies (MATES) is not appropriate to analyze the Plan's potential health risk impacts for the following reasons. First, MATES is a regional mapping tool specifically for the South Coast Air Basin only, not the entire SCAG region, which has a total of five air basins. Second, MATES has a large defined geographic area (zip code or a 2-kilometer by 2-kilometer grid) and is not appropriate for the mobile sources-based HRA. Related to the second reason, MATES is a snapshot of cancer risks from the past (using the 2018 data) and from both stationary and mobile sources. The latest adopted MATES V uses the 2018 data but does not model potential cancer risk into the future (e.g., beyond 2018). Finally, MATES calculates cancer risk from stationary and mobile sources already on the ground ("existing conditions"), not the Plan's incremental ("net new") impacts that CEQA requires. Furthermore, the current analysis already considers impacts to be significant and mitigation measures are required; additional analysis would not change the determination. No further response is necessary.

RESPONSE ORG 13-46

Also refer to **Response ORG 13-45** above, for responses to Table 1. In addition, the population weighted risks from the SCAQMD MATES V show risk values that are higher than the analysis in Section 3.3, *Air Quality*, of the 2024 PEIR because SCAQMD MATES V also includes stationary sources of emissions as well as emissions from stationary and mobile sources that were already existing on the ground ("existing conditions") in 2018 and without the Plan. SCAG has no authority over stationary sources of emissions.

RESPONSE ORG 13-47

The 2024 PEIR provides an estimate of NO₂ for purposes of comparison of scenarios at the regional scale. There are many influential factors that affect air dispersion modeling such as source characteristics, proximity of sensitive receptor to source, meteorological data (i.e., winds, air temperature, atmospheric stability, mixed layer heights, etc.), simple and complex terrain, to name a just few. These factors affect estimated concentrations at receptor locations and could cause the estimated values at receptor locations modeled in the Connect SoCal 2024 PEIR Appendix B-2: Technical Report for Health Risk Assessment and Supplemental NO₂ and N₂ Dispersion Modeling to exceed or be less than those as monitored by the SCAQMD. In addition, as stated in Section 3.3, *Air Quality*,

²⁰ ICAPCD does not have a quantified cancer risk threshold, instead individual projects that meet Tier II would be required to prepare a health risk assessment which should be prepared in consultation of agency staff.

there is an absence of CEQA guidance from all five air districts in the SCAG region on how to perform the *Friant Ranch* health impact analysis quantitatively. Therefore, SCAG used good faith effort at full disclosure by using NO₂ as a proxy to analyze the health implications of ozone emissions both qualitatively and quantitatively. Furthermore, the current analysis already considers impacts to be significant and mitigation measures are required; additional analysis would not change the determination.

RESPONSE ORG 13-48

Refer to **Response ORG 13-47**, above.

RESPONSE ORG 13-49

As explained by CARB, the United States Environmental Protection Agency sets nationwide air quality and emissions standards and oversees state efforts and enforcement. However, CARB focuses on California's unique air quality challenges by setting the state's own stricter emissions standards for a range of statewide pollution sources including vehicles, fuels and consumer products. As explained in **Chapter 1, Introduction**, on page 1-1, Connect SoCal 2024 is a long-range comprehensive plan for the region's multi-modal transportation system. Preparing the Plan is one of SCAG's primary statutory responsibilities under federal and state law. A regional transportation plan (RTP) is the mechanism used in California by both metropolitan planning organizations (MPO) and regional transportation planning agencies (RTPA) to conduct long-range planning (at least a 20-year forecast period) in their regions and to demonstrate regional consistency with federal air quality conformity requirements and state-level SB 375 GHG emissions—which the Plan does. SCAG does not have statutory authority to regulate emissions on-road mobile sources. However, as part of the essential control measures in the state implementation plans to attain federal air quality standards in the SCAG region, SCAG has been collaborating with the six County Transportation Commissions (CTCs) in the SCAG region to implement the most robust and best available transportation control measures (TCMs). Furthermore, SCAG's long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCSs) such as Connect SoCal 2024 have been demonstrating positive transportation conformity to support the attainment of federal health-based air quality standards throughout the SCAG region.

RESPONSE ORG 13-50

Refer to the sensitive receptor and sensitive land use definition in Section 3.3, *Air Quality*, on page 3.3-66. No further response is necessary.

RESPONSE ORG 13-51

The goods movement subsector of transportation is adequately addressed within the 2024 PEIR. Table 3.8-7 and Table 3.8-9 through Table 3.8-10 show transportation emissions for the baseline year (2019) and future plan years of 2030, 2045, and 2050. In particular, Table 3.8-7 breaks out on-road transportation emissions by vehicle type. The majority of goods movement emissions come from heavy-duty vehicles and, as shown in Table 3.8-7, emissions from heavy-duty vehicles are expected to decrease over time as a result of Connect SoCal 2024 implementation. Further, as shown in Table 3.8-12, while total VMT increases slightly, VMT per capita for all vehicles decreases by 8.6 percent from 2019 to 2050. Connect SoCal 2024 focuses growth within existing urban regions and growth opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes (public transit, carpooling), thereby reducing number of vehicle trips and trip lengths and associated

emissions. The land use strategies included in the Plan would encourage higher density development in existing urban cores and opportunity areas which would encourage more multi-family and/or mixed-use projects, via vertical development, instead of the traditional single-family home development (2024 PEIR, Pages 3.8-59 to 3.8-60). Lastly, PMM-GHG-1(j) (pages 3.8-68 to 3.8-69) includes mitigation intended to encourage infill development. Therefore, goods movement and overall transportation emissions are reduced due to a combination of technological advances, alternative fuels, and VMT-reducing measures.

RESPONSE ORG 13-52

Refer to page 3.8-8, footnote 1, for an explanation as to why IPCC's AR4 GWP values were used.

RESPONSE ORG 13-53

Refer to **Response ORG 13-51**, above.

RESPONSE ORG 13-54

Urban heat island and extreme heat days are adequately discussed on page 3.8-11. While urban heat islands and extreme heat days are an important consideration, the purpose of the 2024 PEIR Section 3.8, *Greenhouse Gas Emissions*, is to evaluate CEQA impacts related to the Plan's generation of greenhouse gas emissions that may have a significant impact on the environment and that may conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gases (refer to page 3.8-51 for a discussion of Thresholds of Significance).

RESPONSE ORG 13-55

As stated on page 3.8-65, although GHG emissions are anticipated to decrease compared to existing conditions, while SB 375 targets would be met, emissions are not anticipated to be reduced sufficiently to meet the GHG emissions reduction targets established for California, therefore GHG emissions are identified as significant and unavoidable. Further, Tables 3.8-7 through 3.8-10 identify emissions by vehicle type, source, and county. The 2024 PEIR makes no attempt to hide emissions estimates and clearly identifies the impacts.

RESPONSE ORG 13-56

Rail and ocean-going vessel emissions are not excluded from the inventory; they are presented in Table 3.8-3 in Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR.

RESPONSE ORG 13-57

Rail emissions are presented for the baseline year (2019) as well as years 2030, 2045, and 2050, in Table 3.8-3 in Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR.

RESPONSE ORG 13-58

Table 3.8-12 in Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR highlights the reduction in VMT and VMT per capita of light-duty vehicles and ties in with the discussion of SB 375, which applies to cars and light-duty trucks. Heavy-duty vehicles are captured under the "Total VMT" and the "VMT per capita All Vehicles" categories

in Table 3.8-12. As such, the VMT and VMT per capita of heavy-duty vehicles can be inferred from Table 3.8-12. Further, emissions from heavy-duty vehicles are expected to decrease over time, as evidenced by emissions shown in Table 3.8-7.

RESPONSE ORG 13-59

Refer to Plan **Submission ID 0001822.24** regarding community outreach efforts and how the Plan addresses environmental justice (EJ) issues. Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, regarding non-CEQA issues including environmental justice. Also refer to PMM-GHG-1(k), which includes mitigation aimed at addressing EJ issues and impacts to low-income and communities of color. The mitigation refers to SCAG's Equity Resources for Action Toolbox, which is intended to help local jurisdictions and community members integrate and advocate for equitable methods into policies and implementations. Resources, case studies, and examples are available for toolbox users to contextualize the implementation of specific recommendations and strategies.

The Connect SoCal 2024 Public Participation and Consultation Technical Report documents consultation, outreach, and engagement activities during the development process of the Plan. The March 7, 2024 Joint Meeting of Policy Committees staff report and attachment 1 included at the end of the staff report on the Connect SoCal 2024 Final PEIR documents the outreach efforts for the 2024 PEIR (<https://scag.ca.gov/joint-meeting-past-agendas>).

Refer to Section 3.0.5, *Cumulative Impacts*, of the 2024 PEIR for the 2024 PEIR's cumulative impacts methodology. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the appropriate level of analysis. The 2024 PEIR addresses impacts of Plan implementation at a regional scale, and given the size of the region, diversity of geographic and physical conditions, and variability in implementation of existing policies and enforcement of existing regulations, it is concluded that the Plan, with a few exceptions, would result in significant unavoidable impacts to the environment, including impacts to vulnerable communities. Because the Plan is a regional-scale planning document, the only other cumulative projects would be other regional-scale plans or programs. All impacts resulting from development occurring within the region through 2050 would be considered Plan-related impacts; because the Plan would, in and of itself, result in significant impacts, Plan-related impacts are also anticipated to considerably contribute to significant cumulative impacts. Therefore, the 2024 PEIR considers cumulative impacts to vulnerable communities in the region in the same manner as for all communities affected by the impacts of Plan implementation, which are determined to be significant and unavoidable.

Refer to Section 3.0.4, *Mitigation Measures*, of the 2024 PEIR and **Master Response No. 5, Approach to Mitigation Measures**, regarding project-level mitigation measures. It is the responsibility of local implementing agencies to identify and evaluate impacts associated with all projects subject to CEQA within their respective jurisdictions, including prescribing appropriate mitigation to address any significant impacts to the extent feasible. This also applies to projects involving warehouse uses in proximity to residential communities or other sensitive uses. As such, SCAG has no authority to require that local lead agencies engage with vulnerable communities, including SB 535 communities, to determine the most effective mitigation measures or strategies to employ to address impacts of encroachment from warehouse and goods movement facilities. Nonetheless, the 2024 PEIR provides mitigation measures to address adjacency issues with future development, though not specifically with regard to development in proximity to SB 535 communities.

RESPONSE ORG 13-60

Refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, and **Master Response No. 6, Alternatives**. As noted in Master Response No. 6, CEQA does not require that an EIR evaluate every conceivable alternative; rather, the EIR must evaluate a reasonable range of alternatives. The growth forecast undergirding the Plan's Forecasted Regional Development Pattern was also utilized for the baseline scenario (No Project Alternative), and this forecast utilized local agency input regarding anticipated growth within each respective jurisdiction. As such, the forecasted growth was based on the most up-to-date planning inputs and is therefore the projected growth and associated forecasted development pattern are considered reasonably foreseeable. SCAG's forecasting process begins by establishing low and high regional growth projections based on models and expert insights to evaluate a range of possible future outcomes. Within this range, the Connect SoCal 2024 regional growth forecast considers likely outcomes, local conditions, and SCAG's statutory roles, and all of which delivered a single future estimate of growth for transportation modeling and technical analysis purposes. As noted by the commenter, future growth scenarios that are stagnant or declining are not "considered most likely"; importantly, these scenarios are not reasonably foreseeable and accordingly alternatives reflecting these growth scenarios were not evaluated in the 2024 PEIR. It is also important to note that SCAG's regional growth forecast development started with the convening of a demographic panel of experts, consisting of academic scholars and leading practitioners in demographic and economics. They reviewed and discussed key input assumptions and regional, state, and national data and recommended a set of growth projections for the SCAG region and its six counties from 2019 to 2050. A goods movement-restricted growth scenario, therefore, was not among the range of potential growth patterns that were considered in the Plan and thus an alternative reflecting this scenario was not included in the analysis presented in Chapter 4, *Alternatives*, of the 2024 PEIR. Furthermore, with respect to Goods Movement, truck traffic movement is substantially based on land use, intra-regional, external, and passing through transportation routes, as well as activities at the region's ports. Truck movements are already being reduced as a result of compact development policies, and thus the Intensified Land Use Alternative, which is evaluated in the 2024 PEIR, would be expected to also result in incrementally fewer truck movements compared to the Plan given the more compact development pattern. Refer to Plan **Submission ID 1829.01.1 through 1829.01.3** for additional information.

RESPONSE ORG 13-61

Refer to **Response ORG 13-51**, above.

RESPONSE ORG 13-62

Refer to Plan **Submission ID 0001822.29** regarding Map ES-4 and the underlying data in the Plan. Map ES-4 in the 2024 PEIR reproduces a Plan map. Maps in the 2024 PEIR (and Plan) are based on underlying information including but not limited to the Growth Forecast, Project List, and/or other GIS resource data. The analyses in the 2024 PEIR are based on the underlying data not the maps. The requested revisions would not substantially affect the 2024 PEIR analyses or conclusions. No changes are made to this map in the 2024 PEIR. However, the related Plan map is updated as part of the Final Plan. Refer to Appendix J for more information. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the detail presented in analysis and associated maps in the 2024 PEIR.

RESPONSE ORG 13-63

Refer to Plan **Submission ID 0001822.30** regarding Map ES-5 and the underlying population data in the Plan relating to Priority Development Areas (PDAs). Map ES-5 in the 2024 PEIR reproduces a Plan map. Maps in the 2024 PEIR (and Plan) are based on underlying information including but not limited to the Growth Forecast, Project List, and/or other GIS resource data. The analyses in the 2024 PEIR are based on the underlying data not the maps. The requested revisions would not substantially affect the 2024 PEIR analyses or conclusions. No changes are made to this map in the 2024 PEIR. However, the related Plan map is updated as part of the Final Plan. Refer to Appendix J for more information. Also refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, regarding the forecasted development pattern in the context of PDAs.

RESPONSE ORG 13-64

Refer to Plan **Submission ID 0001822.31** regarding Map ES-6 and the underlying population data in the Plan relating to Transit Priority Areas (TPAs) and Neighborhood Mobility Areas (NMAs). Map ES-6 in the 2024 PEIR reproduces a Plan map. Maps in the 2024 PEIR (and Plan) are based on underlying information including but not limited to the Growth Forecast, Project List, and/or other GIS resource data. The analyses in the 2024 PEIR are based on the underlying data not the maps. The requested revisions would not substantially affect the 2024 PEIR analyses or conclusions. No changes are made to this map in the 2024 PEIR. However, the related Plan map is updated as part of the Final Plan. Refer to Appendix J for more information. Also refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, regarding the forecasted development pattern in the context of TPAs and NMAs.

RESPONSE ORG 13-65

The bookmark error on Page ES-13 is corrected as shown in Chapter 9, Section 9.3.

RESPONSE ORG 13-66

Truck traffic associated with cargo activity in the region is included in the SCAG regional surface transportation models and related analyses in the Plan, while aircraft noise (including noise from cargo flights and ground service equipment) is under the jurisdiction of the individual airports or the Federal Aviation Administration, and air emissions from all aircraft and airport operations are monitored by the SCAQMD and CARB. While future increases in cargo operations will contribute to impacts associated with air pollutant emissions, aircraft and airport noise, and truck traffic, such impacts have been taken into consideration in the underlying data and modeling utilized in the analysis presented in the 2024 PEIR. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail presented in the various impact analyses, including aircraft noise impacts, in the 2024 PEIR. Refer to Plan **Submission ID 0001822.34** regarding truck traffic, noise, and air emissions associated with increases in air cargo traffic at airports in the region.

RESPONSE ORG 13-67

SCAG's modeling accounts for growth in truck trips, including airport cargo trucks, in its regional surface transportation models for each Connect SoCal update. For Connect SoCal 2024, the regional surface transportation models included estimated airport truck trips for the model base year (2019) and forecast horizon year (2050). Each Connect SoCal amendment and update reflects changes to surface and airport ground transportation, including airport cargo truck trips and updated airport landside ground transportation projects. The growth

assumptions regarding airport truck traffic, therefore, were included in the modeling inputs for the Plan. As noted above in **Response ORG 13-60**, evaluation of an alternative that involves a goods movement-restricted growth scenario is not warranted in the 2024 PEIR as such a scenario is not reasonably foreseeable based on local jurisdiction input regarding future growth. Refer to Plan **Submission ID 0001822.37** regarding airport truck traffic growth at the region's airports and modeling assumptions.

RESPONSE ORG 13-68

Airport noise analysis, including noise at RIV, SCS, and SBD, falls under the jurisdiction of each of the airports and the FAA Office of Noise. The respective airport offices of noise and the FAA Office of Noise highlighted in the Plan Aviation and Ground Access Technical Report are for illustrative and not comprehensive purposes. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of analysis of airport noise impacts presented in the 2024 PEIR. Refer to Plan **Submission ID 0001822.38** regarding airport noise at cargo airports including RIV, SCS, and SBD.

RESPONSE ORG 13-69

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE ORG 13-70

Refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above. Development associated with goods movement is part of the growth forecast and is addressed at the local level by each jurisdiction as they deem appropriate.

RESPONSE ORG 13-71

Map 3.11-1 is updated with the referenced 2019 SCAG land use data. Refer to Chapter 9, Section 9.3, for the resulting map revisions to Map 3.11-1.

RESPONSE ORG 13-72

The data in Table 3.14-3 on page 3.14-4 of the 2024 PEIR is updated to reflect the correct values for 2019 average household size. Refer to Chapter 9, Section 9.3, for the resulting table text revisions.

RESPONSE ORG 13-73

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE ORG 13-74

The unemployment rates presented in Table 3.14-7 are population-weighted as suggested by the commenter. No text changes to the 2024 PEIR are required.

RESPONSE ORG 13-75

Also refer to **Master Response No. 4, Regional Development Pattern and Growth Forecast**, and **Response ORG 13-60**, above, regarding growth forecast methodology and assumptions.

RESPONSE ORG 13-76

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE ORG 13-77

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE ORG 13-78

Refer to **Master Response No. 2, General Comments and Non-CEQA Issues**, above.

RESPONSE ORG 13-79

Also refer to **Response ORG 13-78**, above.

RESPONSE ORG 13-80

Also refer to **Response ORG 13-60**, above.

RESPONSE ORG 13-81

Refer to Plan **Submission ID 0001822.50** regarding Map 3 from the Plan's Demographics and Growth Forecast Technical Report (Map 3.14-3 in the 2024 PEIR). As noted therein, the existing map contains a note that county unincorporated areas are excluded to improve cartographic display. Growth within unincorporated areas is more readily visible in Map 2 of the Demographics and Growth Forecast Technical Report. Also refer to **Master Response No. 3, Level of Detail in a Program EIR versus Project EIR**, regarding the level of detail presented in maps in the 2024 PEIR.

RESPONSE ORG 13-82

SCAG's transportation modeling includes assumptions for truck traffic and passenger vehicle traffic. The commenter's assertions regarding their own data and findings relative to the proportion of truck traffic to passenger vehicle traffic in the Inland Empire do not raise a specific issue regarding the 2024 PEIR and the comments regarding trucks increasingly replacing passenger vehicles on area freeways are speculative and not supported by evidence. Refer to Plan **Submission ID 0001822.51** regarding freight truck volume and bottleneck information presented in the Plan's Goods Movement Technical Report.

RESPONSE ORG 13-83

The commenter cites recent reports regarding truck safety issues and an increase in truck-related incidents and fatalities in the last several years but does not provide a specific reference to the source of the statistics.

Nonetheless, it is reasonable to assume that the projected increase in the truck VMT relative to automobile VMT in the region could lead to an incremental increase in truck-related safety incidents, collisions, injuries, and fatalities. While it is speculative to estimate the increase in such events given the number of variables to consider, but it is reasonably foreseeable that with an increased percentage of trucks occupying lane miles in the region, increased safety incidents could occur over the life of the Plan. As noted on page 3.17-14 in Section 3.17, *Transportation*, of the 2024 PEIR, “[g]rowing trade and increased volumes of goods moving across the transportation system have contributed to greater congestion, safety concerns, harmful emissions of dangerous pollutants, wear-and-tear on roadways and impacts on local neighborhoods.” Although compliance with existing design standards and other requirements, as well as implementation of applicable mitigation measures, would reduce impacts regarding safety hazards, impacts in this regard are concluded to be significant and unavoidable as discussed under Impact TRA-3 beginning on page 3.17-52.

8.6.30 LETTER ORG 14: SOUTHERN CALIFORNIA BUSINESS COALITION

Southern California Business Coalition

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001756** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 14-1

This comment provides an introductory statement regarding the comments provided in this letter. Also refer to **Responses ORG 14-2 to ORG 14-3**, below, for responses to the individual comments contained herein.

RESPONSE ORG 14-2

Also refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, and **Master Response No. 4, Regional Development Pattern and Growth Forecast**, above.

RESPONSE ORG 14-3

SCAG acknowledges the Business Coalition's concurrence with comments provided in Letter SUB 1 (OCCOG); refer to responses to **Letter SUB 1** in this chapter.

8.6.31 LETTER ORG 15: WORLD BE WELL ORGANIZATION

Gurumantra Khalsa, Executive Director
World Be Well Organization
4108 Watkins Dr.
Riverside CA 92507-4701

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001775** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 15-1

Also refer to **Master Response No. 5, Approach to Mitigation Measures**, above. Also refer to Section 3.2, *Agriculture and Forestry Resources*, of the 2024 PEIR for a discussion of impacts and mitigation measures regarding agricultural resources.

RESPONSE ORG 15-2

Also refer to **Master Response No. 5, Approach to Mitigation Measures**, above, regarding Plan features. The SoCal Greenprint tool will be implemented as part of SMM-AG-3. Also refer to **Response ORG 5-3** for further details regarding the development of the SoCal Greenprint tool.

RESPONSE ORG 15-3

This comment does not raise a substantive issue regarding the Draft 2024 PEIR or the analysis provided therein. Also refer to **Master Response No. 2, General Comments and Non-CEQA Issues**. Also refer to Section 3.2, *Agriculture and Forestry Resources*, of the 2024 PEIR for a discussion of impacts and mitigation measures regarding agricultural resources. Also refer to **Response ORG 5-27** regarding SCAG's RAMP program.

8.6.32 LETTER ORG 16: RIVERSIDE NEIGHBORS OPPOSING WAREHOUSES (LATE)

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

February 5, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001822** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE ORG 16-1

Commenter provides recent information regarding the federal review process under the Clean Air Act with respect to the federal ozone standards and the State Implementation Plan (SIP). Specifically, EPA is proposing to disapprove a SIP revision submitted by the State to meet the 1997 8-hour ozone national ambient air quality standards (NAAQS) in the Los Angeles-South Coast Air Basin, California ozone nonattainment area (refer to 89 Fed. Reg. 7320 [February 2, 2024]). No final action has been taken by EPA, and final action from EPA is not expected before SCAG Regional Council considers the Plan for adoption in April 2024. As such, the analysis in the PEIR remains the same. SCAG works with CARB and the EPA each planning cycle to prepare an RTP/SCS consistent with applicable regulations and the latest planning assumptions. Each cycle adjustments are made to projects and latest planning assumptions to reflect the latest regulations and projects that respond to state and federal policies and requirements. Refer to **Submission ID 0001822** for more information.

8.6.33 LETTER IND 1: GEORGE HAGUE

George Hague
92555

January 12, 2024

This letter includes comments on both the Plan and PEIR. As discussed above in Section 8.3, responses to comments received on the Draft Plan are addressed separately in the Public Participation and Consultation Technical Report of the Final Connect SoCal 2024. Refer to **Submission ID 0001752** in the Public Participation and Consultation Technical Report for responses to all Plan-related comments in this letter.

RESPONSE IND 1-1

Refer to **Master Response No. 1, Comments related to Connect SoCal 2024**, above. The commenter's assertion that the Plan will not achieve the targeted emissions reductions is not substantiated by any evidence. As noted in Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR, the Plan would achieve the currently adopted emissions reductions targets prescribed by SB 375. In addition, contrary to the statements by the commenter, the Plan does not simply prescribe the construction of new roadways and widening of existing roadways, but rather provides significant financial investments in existing facility maintenance, transit system expansion, active transportation programs and facilities, and other non-vehicular approaches to reducing VMT and related air quality and GHG emissions. The 2024 PEIR evaluates the Plan including all identified individual transportation projects, including a few roadway widenings. As noted in Section 3.17, *Transportation*, page 3.17-46, adding roadway capacity in congested areas can lead to increased network-wide VMT (known as "induced travel") which reduces the initial congestion relief of the added capacity. While roadway widenings can induce travel, such impacts are captured at a regional scale in the modeling and analysis.

RESPONSE IND 1-2

The Plan does not encourage "sprawling" development, but rather includes policies and strategies that focus growth in areas already served by existing infrastructure and services such that intrusion into resource-rich areas or established neighborhoods is minimized. This development pattern is intended to build on existing resources and reduce the potential for future growth to impacts sensitive biological or cultural resources located outside of urban centers, and foster investments in existing communities to improve access to services and transportation options. While some projects could result in incidental physical impacts to existing neighborhoods, the vast majority of transportation projects under the Plan would not result in direct effects on existing communities or result in displacement of people or housing in a given area (see discussion under Impact POP-2 in Section 3.14, *Population and Housing*, of the 2024 PEIR). Nonetheless, impacts related to displacement of existing people and housing were determined to be significant and unavoidable. Impacts to biological resources associated with implementation of Plan-related transportation improvements are discussed in Section 3.4, *Biological Resources*, of the 2024 PEIR.

RESPONSE IND 1-3

This comment provides a closing statement regarding the comments provided in this letter and does not raise any issues related to the Plan's impact on the physical environment under CEQA. The commenter will be informed of future notices for the Plan and PEIR. No further response is necessary.



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