

# Connect SoCal

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



## EXHIBIT B FINDINGS OF FACT Final Program Environmental Impact Report

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# EXHIBIT B

## Findings of Fact

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- B.1 Introduction
- B.2 Project Description
- B.3 Findings Required under CEQA
- B.4 Findings Regarding Potential Environmental Effects That Have No Impact or Are Less than Significant
- B.5 Findings Regarding Significant Unavoidable Adverse Impacts That Cannot Be Mitigated to a Level of Less than Significant
- B.6 Findings Regarding Alternatives
- B.7 Findings Regarding Mitigation Monitoring and Reporting Program
- B.8 Findings Regarding Location and Custodian of Documents
- B.9 Certification Regarding Independent Judgment
- B.10 Summary of Findings

### TABLES

TABLE B-1	Comparison of Environmental Impacts for Connect SoCal 2024 and Alternatives.....	B-140
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## B.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a public agency shall not approve or carry out a project for which an Environmental Impact Report (EIR) has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. This 2024 Final EIR has been prepared in accordance with CEQA as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Code of Regulations title 14, Section 15000 et seq.). This document presents the findings made by the Southern California Association of Governments (SCAG), in its capacity as the CEQA lead agency, regarding the 2024–2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), referred to as Connect SoCal 2024 (also referred to herein as “Plan” or “Project”) evaluated in the Final Program Environmental Impact Report (2024 Final PEIR) for the Project. In addition, pursuant to Public Resources Code (PRC) Section 21081 and CEQA Guidelines Section 15093, the existence of significant unavoidable impacts resulting from the Project requires SCAG to prepare a Statement of Overriding Considerations explaining why the agency is willing to accept the unavoidable significant impacts. The Findings of Fact (Findings) reported in the following pages incorporate the facts and discussions of environmental impacts that are described in the Connect SoCal 2024 Program Environmental Impact Report (2024 PEIR). Additionally, the Statement of Overriding Considerations (as set forth in Exhibit C), describes the economic, social, environmental, and other benefits of the Plan that override the significant environmental impacts.

For each of the impacts associated with the Plan, the following are provided:

- **Description of Impacts** – A specific description of the environmental impact identified in the 2024 PEIR.
- **Mitigation** – Identified mitigation measures or actions that are proposed for implementation as part of the Plan.
- **Findings and Rationale** – Explanation regarding the adoption of mitigation measures, their implementation, and the short- and long-term benefits related to reduction in criteria air pollutants and per capita reductions in greenhouse gas emissions (GHG), and other economic, social, and environmental benefits that warrant overriding the significant and unavoidable environmental impacts.

The Findings present the environmental impacts associated with Connect SoCal 2024. While the significance thresholds utilized throughout the 2024 PEIR largely follow those included in Appendix G of the CEQA Guidelines in terms of content and organization by topic, in some instances where similar or related issues are addressed by multiple thresholds either in the same section or in different sections (e.g., greenhouse gas emissions, hazards and hazardous materials, public services, and wildfire), impacts associated with those thresholds may be combined or addressed together in one section in order to reduce redundancy and provide a more succinct discussion. Findings below are presented separately as thresholds are not combined.

Where feasible, mitigation measures have been identified to reduce significant impacts. CEQA requires a mitigation monitoring or reporting program to be adopted by the Lead Agency. SCAG has prepared a Mitigation Monitoring and Reporting Program (MMRP) (as set forth in Exhibit A), in compliance with the requirements of CEQA Section 21081.6 to ensure the efficacy of proposed mitigation measures. The 2024 PEIR identifies the potentially significant environmental impacts associated with the Plan and specifies measures designed to mitigate adverse environmental impacts. The MMRP includes procedures to be used to implement the mitigation measures adopted in connection with the certification of the Connect SoCal 2024 PEIR and methods of monitoring and reporting.

Because the 2024 PEIR presents a region-wide, programmatic level of assessment of existing conditions and potential impacts associated with implementation of Connect SoCal 2024, this 2024 PEIR identifies programmatic mitigation measures for which SCAG would be responsible on a regional scale (these mitigation measures are phrased as “SCAG shall”). In addition, consistent with the provisions of CEQA Guidelines Section 15091(a)(2), SCAG has identified mitigation measures that are within the responsibility and jurisdiction of other public agencies, including lead agencies, and that can and should be considered to mitigate project-level impacts, as applicable and feasible.

As will be discussed in more detail in the following sections, it is the finding of the SCAG Regional Council that the proposed 2024 Final PEIR fulfills environmental review requirements for Connect SoCal 2024; constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA; and reflects the independent judgment of the SCAG Regional Council.

## B.2 PROJECT DESCRIPTION

### B.2.1 PLAN VISION AND GOALS

Connect SoCal 2024 represents the vision for the region and reflects the planned transportation investments, policies and strategies that will integrate with the Forecasted Regional Development Pattern to achieve the Plan’s goals. The vision and goals for Connect SoCal 2024 are rooted in the direction set forth by Connect SoCal 2020, reflecting both SCAG’s statutory requirements and the emerging trends and persistent challenges facing the region.

SCAG’s vision for Southern California in the year 2050 is:

*“A healthy, prosperous, accessible and connected region for a more resilient and equitable future.”*

The following are the goals and subgoals of Connect SoCal 2024 designed to help SCAG achieve this vision:

**Mobility: Build and maintain an integrated multimodal transportation network.**

- Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.
- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.
- Support planning for people of all ages, abilities and backgrounds.

**Communities: Develop, connect and sustain communities that are livable and thriving.**

- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.
- Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.

**Environment: Create a healthy region for the people of today and tomorrow.**

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

- Conserve the region’s resources.

**Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.**

- Improve access to jobs and educational resources.
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.

## **B.2.2 REGIONAL GROWTH FORECAST AND FORECASTED REGIONAL DEVELOPMENT PATTERN**

As part of developing a Sustainable Communities Strategy per SB 375, SCAG must include a “forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies ...” will enable SCAG to reach its GHG emission reduction target of 19 percent below 2005 levels by 2035.

SCAG prepared a regional growth forecast to determine the projected increase in population, households, and jobs based on local general plans and known development entitlement agreements, including available data from 6th cycle housing element updates. In addition, regional sustainability strategies, including priority growth and environmentally constrained areas were included based on Connect SoCal 2020. The forecast reflects changes to state- and local-housing-supportive policy as well as stronger housing production numbers in recent years, including ADUs, which are historically undercounted.<sup>1</sup> This forecasted regional development pattern for Connect SoCal 2024 details where people, households and employment will be located through 2050, the horizon year of the Plan.

In addition to far more near-term household growth, the forecasted regional development pattern also demonstrates housing growth in generally more sustainable locations (i.e., infill locations in proximity to infrastructure) within the region than Connect SoCal 2020.

The regional and county growth forecasts reflect recent and past trends and expert-derived demographic and economic assumptions. In contrast to short-range forecasts, which focus on business cycles and market trends, a 30-year time horizon relies more heavily on births, deaths, migration and the strength of a region’s economic base compared to the nation as a whole. Due to changes in these trends and assumptions, SCAG is projecting just over half the level of population growth over this Plan’s horizon as compared to what was anticipated in Connect SoCal 2020. Consistent with global trends, the older-age population of the SCAG region is steadily growing. Older people tend to live alone or in smaller households, have different transportation and spending patterns, and lower labor force participation.

SCAG seeks to analyze and address racial and socio-economic inequities in the region. These inequities have resulted in vastly different living and social conditions, as well as less access to opportunities for certain racial and

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<sup>1</sup> The Connect SoCal Regional Growth Forecast begins with an expert assessment of regional demographic and economic trends and uses a variety of data sources—including local land use plans—to assess where growth is most likely to occur within the region, emphasizing a balance between future employment, population, and households. SCAG’s RTP/SCS growth forecasting process is also informed by the Regional Growth Vision and integrates input from local jurisdictions. As discussed above, SCAG’s preliminary growth forecast at the jurisdiction and neighborhood levels, released on May 23, 2022, sought to reflect capacity changes from the 6th cycle of RHNA based on available housing elements and information from jurisdictions. SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements, and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024. However, it is expected that household growth over the Connect SoCal 2024 horizon will exceed the 6th cycle RHNA housing unit need.

socio-economic groups. SCAG considers potential impacts on people of color and low-income households in the regional growth, transportation and economic development planning and analysis, and recognizes that more affirmative approaches that seek to counter the effects of historic practices are needed to advance equity and social justice across the region. The Regional Planning Policies and Implementation Strategies are intended to address these issues.

## PRIORITY DEVELOPMENT AREAS

Priority Development Areas (PDAs) are areas within the SCAG Region where future growth can be located in order to help the region reach mobility and environmental goals. Generally, this means that people in these areas currently have or are anticipated to have in the future, access to multiple modes of transportation or trip origins and destinations are closer together, thereby allowing for shorter trips. These areas would accommodate 68 percent of forecasted population growth, 66 percent of forecasted household growth, and 54 percent of forecasted employment growth between 2019 and 2050. PDAs account for 8.4 percent of the region's total land area and include Transit Priority Areas (TPAs), Neighborhood Mobility Areas (NMAs), Livable Corridors and Spheres of Influence (SOIs) (in unincorporated areas only). This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces and conserve the region's resource areas.

- **Transit Priority Areas (TPAs).** TPAs are areas within one-half mile of existing or planned major transit stops.<sup>2</sup> Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Focusing regional growth in areas with planned or existing major transit stops is key to achieving equity, economic and environmental goals.
- **Neighborhood Mobility Areas (NMAs).** NMAs focus on improving, restoring, and enhancing safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways, and other destinations. Four elements of an NMA are: (1) Intersection density, (2) Low-speed streets, (3) Land use diversity, and (4) Accessibility to amenities within 1 mile using street network distances.
- **Livable corridors.** Livable corridors are key corridors where jurisdictions can plan for increased density at nodes and redevelopment of single-story under-performing retail with higher-density housing and employment centers. Many of the strategic nodes along key corridors are located within High Quality Transit Corridors (HQTCs), making transit a more convenient and viable option. This strategy integrates certain transit improvements, including Bus Rapid Transit (BRT), other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.
- **Spheres of Influence (SOIs).** SOIs are existing or planned service areas within unincorporated areas of SCAG's six counties. A city will periodically annex parcels in an SOI into the city limits to include new developments or areas with infrastructure needs. Prioritizing unincorporated county growth within existing SOIs helps discourage urban sprawl and the premature conversion of agricultural and natural lands—and typically makes more efficient use of infrastructure that can reduce costs to taxpayers. As a result, only 4 percent of the region's future household growth from 2019 to 2050 will be located in SOIs outside of incorporated city boundaries.

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<sup>2</sup> A major transit stop is defined in Section 21064.3 of the PRC as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

## GREEN REGION RESOURCE AREAS

Green Region Resource Areas (GRRAs), which derive from the SB 375 statute and SCAG's role in the protection of resource areas and farmland, are considered alongside the PDAs in the preparation of the forecasted regional development pattern. GRRAs depict the region's natural assets – areas with acute risks from climate change – and highlight areas where future growth could result in negative environmental impacts if left unaddressed. Generally – but not exclusively – these areas reflect the urban-rural fringe away from existing developed areas. Thus, reducing growth in these areas has the co-benefit of reducing growth far from jobs and destinations. As the region faces unprecedented challenges in balancing housing and employment growth with resource conservation, the preservation and restoration of GRRAs can reduce risks from climate change and promote future resilience in the region. GRRAs consist of the following ten types of areas:

- **Flood Areas.** FEMA delineates areas that are subject to inundation by a flood with a 1 percent or greater chance of being equaled or exceeded during any given year, commonly referred to as the 100-year flood or base flood.
- **Coastal Inundation (Sea Level Rise).** Potential inundation of coastal areas resulting from a projected 3-foot rise in sea level above current Mean Higher High Water (MHHW) conditions.
- **Wildfire Risk.** CAL FIRE designates areas that are at risk from significant fire hazards based on fuels, terrain, weather and other relevant factors, which are referred to as "Fire Hazard Severity Zones" (FHSZ). Also included are areas along the edge of established communities (Wildland-Urban Interface) and areas where human habitation is mixed with areas of flammable wildland vegetation (Wildland-Urban Intermix) zones.
- **Open Space and Parks.** All publicly owned open space, including those with fee ownership, as identified in the California Protected Areas Database (CPAD), the California Conservation Easement Database (CCED), and the County of Ventura Save Our Agricultural Resources (SOAR).
- **Endangered Species and Plants.** Location and condition of species of rare and sensitive plants, animals and natural communities in California.
- **Sensitive Habitat Areas.** Areas with a high concentration of animals and plant life that are sensitive to growth, such as wetlands, habitat connectivity areas and areas rich with natural resources to support various species.
- **Natural Community and Habitat Conservation Plans.** These plans identify and provide for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity.
- **Tribal lands.** Locations of the 16 Federally Recognized Tribal entities in the SCAG region.
- **Military Installations.** Military lands managed by the U.S. Department of Defense.
- **Farmlands.** Agricultural and working lands as defined by the Farmland Mapping & Monitoring Program (FMMP) in the California Department of Conservation.

### B.2.3 PROJECT LIST

Connect SoCal 2024 includes approximately \$750 billion worth of investment in our regional transportation system. SCAG collects projects submitted by County Transportation Commissions (CTCs,) based on their county or district level needs and goals. These submissions generally align with the Regional Goals and do not undergo an additional selection process. SCAG assesses transportation performance at the system level. The Connect SoCal 2024 project list (included as Project List Technical Report of the Plan) includes approximately 2,000 projects with

both near-term and long-term investments: the Federal Transportation Improvement Program (FTIP) reflects near-term investments which form the foundation of the RTP project investment strategy and represents the first six years of already-committed funding for projects requiring federal approval or those that are regionally significant. The RTP reflects long-term investments and contains a financially constrained set of transportation projects above and beyond the FTIP, including projects submitted from the CTCs and additional Regional Strategic Investments needed to achieve the Plan's goals and performance targets.

## B.2.4 REGIONAL STRATEGIC INVESTMENTS

Connect SoCal 2024 is a financially constrained plan in terms of transportation revenues and expenditures. However, there is a gap between what can be achieved beginning at the local level and what must be achieved to meet performance requirements. The gap is addressed through a set of Regional Strategic Investments, supported by Regional Planning Policies and Implementation Strategies. Key among these strategies is a transition away from fuel tax-based revenues and an increased reliance on user fees for various transportation facilities in the region. User fees are linked directly to how people travel. They can support the region's infrastructure needs and promote a more balanced transportation system by encouraging residents and visitors to consider the effects that their travel choices have on the larger transportation ecosystem. User fees can be structured and implemented to serve as a critical tool for advancing environmental, economic and equity-related goals, including reducing traffic congestion and vehicle miles traveled, while encouraging increased uptake of active transportation modes and boosting transit ridership. In the SCAG region, numerous policy and technical studies have been conducted on the subject. However, more work is planned to examine and demonstrate the viability of user-fee systems, including toll networks, mileage-based user fees to replace fuel taxes, and congestion pricing zones that levy fees based on time-of-day and congestion levels. Connect SoCal 2024 includes these user-fee-based funding strategies to support system management, preservation and resilience, and to contribute to the region's greenhouse gas reduction goals. SCAG further considers the potential equity concerns that accompany user fee policies and assumes mitigation measures, such as the establishment of a mobility equity fund. This can provide resources that can increase access for priority equity communities, particularly transportation equity zones (TEZs).

The following Regional Strategic Investments reflect what is necessary to maintain a state of good repair of our existing network, support a multimodal network, and fund system improvements and maintenance (for a full list of Regional Strategic investments and the proposed user fee structures, see Chapter 3 of the Plan):

- **System Preservation and Resilience: Highways, Local Streets and Roads.** "Fix it First" has been a guiding principle for prioritizing transportation funding in SCAG's RTPs for the last decade. The cost of rebuilding roadways is fourteen times more than preventative maintenance. Preservation of the transportation system can extend the pavement life in a cost-effective manner and can also improve safety. Connect SoCal 2024 includes \$75.4 billion towards the preservation, operation and resilience needs of the state highway system and \$87.7 billion towards the preservation, operation and resiliency needs of regionally significant local streets and roads.
- **Managing the System: Transportation System Management.** Connect SoCal 2024 increases investment and strengthens policy levers to optimize system performance while realizing greenhouse gas reduction quickly and efficiently. SCAG will pursue the following management strategies in coordination with regional and local partners:
  - **Regional Express Lanes Network: Concept of Operations and Buildout.** The regional express lane network integrates congestion pricing to optimize existing capacity on freeways and offer users greater travel-time reliability and choices. Express lanes operate on the principle of congestion pricing—when more vehicles are using those lanes, the price increases accordingly to manage congestion in the lanes.



Express lanes and toll roads also generate revenues that fund construction and operation of the facilities and can relieve air pollution and GHG emissions associated with congestion.

- **Intelligent Transportation System (ITS).** SCAG’s ITS program plans for transportation technology advancements and assesses potential impacts to the transportation system. This includes, but is not limited to, continuing to maintain and update the multi-county Regional ITS Architecture, incorporating revisions to existing projects and any proposed new projects as part of the RTP/SCS development, and participating in statewide and county Regional ITS Architecture update efforts.
- **Smart Cities.** The Smart Cities Program must evolve and adapt to the latest trends and technologies. SCAG will update the Smart Cities Vision Plan (by July 2026) and develop critical research reports focused on emerging technologies.
- **Future Workplace.** This initiative focuses on the strategies, implementation and impacts of telework and tele-everything as the world shifts to post-pandemic behaviors—through the lens of smart cities and transit demand management.
- **Transit and Multimodal Integration: Regional Enhancements and Improvements.** The region has ambitious goals to reduce greenhouse gas emissions in the transportation sector, which is the largest source of carbon dioxide emissions in California and a primary driver of climate change. This will be achieved, in part, by reducing single-occupancy vehicle trips and increasing transit/rail mode share. A key step toward meeting these goals, as well as local and county goals for mobility and equity, can come from improving the speed and reliability of transit/rail services throughout the region. Since 1991, the region has spent over \$196 billion on transit (in 2019 dollars). Connect SoCal 2024 strategies consists of three main elements:
  - **Dedicated Transit Lanes.** The regional transit priority network is intended to enable enhanced transit services, improved mobility, accessibility and sustainability.
  - **Zero-Emission Bus Acceleration.** All transit agencies are required to transition to 100 percent zero-emission bus fleets by 2040 (Innovative Clean Transit regulation), a decade before the horizon year of Connect SoCal. Due to the upfront costs and supportive infrastructure necessary, additional funding is needed to support the transition.
  - **Mobility Hubs.** Mobility hubs are places where we can seamlessly connect with multiple modes of transportation in a safe, comfortable and accessible environment. SCAG’s strategy is to focus targeted investments in a set of prioritized mobility hubs distributed across the region.
- **Complete Streets: Planning for all Users.** Connect SoCal 2024 provides for a future where everyone has safe, affordable, reliable and sustainable transportation options to access opportunities and resources necessary to thrive requires additional transportation investments.
- **Complete Streets.** Complete streets are designed to support the safety, comfort and mobility for all road users. The approaches vary based on community context, but elements often include comfortable sidewalks, bicycle lanes, transit priority lanes and signals, high-quality transit stops, frequent and safe crosswalks, median islands, accessible signals, curb extensions, modified vehicle travel lanes, and streetscape and landscape treatments. They may also accommodate and optimize new technologies and micromobility devices, first mile/last mile connections to transit/rail and curbside management strategies including last-mile deliveries. SCAG’s strategy is to focus targeted investments on corridors on the High Injury Network (HIN), where safety issues are concentrated and improvements to eliminate these issues would encourage mode shift.
- **Safe Routes to School (SRTS).** The primary goal of SRTS is to encourage and facilitate active transportation options while enhancing the safety and accessibility of routes used by people walking, biking or rolling. These

programs often involve a combination of infrastructure improvements, educational campaigns and policy changes to create safer environments for traveling via active transportation. SCAG's strategy is to focus targeted investments on corridors within the High Injury Network (HIN) and located in close proximity to K-12 schools.

## **B.2.5 REGIONAL PLANNING POLICIES AND IMPLEMENTATION STRATEGIES**

The Plan includes project lists from CTCs and future land use and growth information from local jurisdictions. These provide the foundation for the Plan elements and the shape where the region is headed. As noted above, there is a gap between what can be achieved from a bottom-up process and what must be achieved to meet the performance requirements. This gap is addressed through the Regional Strategic Investments and supported by Regional Planning Policies and Implementation Strategies, which are discussed below.

### **REGIONAL PLANNING POLICIES**

SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the Plan's vision and achievement of the goals. The Regional Planning Policies establish broad regional policies for integrated land use and transportation planning and identify the path towards realizing the vision of Connect SoCal 2024. The policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. Implementation of the policies at the regional and local level will address emerging issues facing the region and achieve the vision represented by Connect SoCal 2024.

The policies are meant to guide decision making for both SCAG and partner agencies to achieve a sustainable, equitable, and resilient future for the region. The policies are also intended to be used as a resource by CTCs or local jurisdictions to demonstrate alignment with the RTP/SCS in seeking resources from state or federal programs.

Per Government Code Section 65080(b)(2)(K), SCAG's SCS does not regulate the use of land, nor shall it be interpreted as superseding the exercise of the land use authority of cities and counties in the region. The guidance provided in the Plan's Regional Planning Policies is meant to support local jurisdictions in future General Plan updates to help in implementing the regional vision of Connect SoCal 2024.

### **IMPLEMENTATION STRATEGIES**

The Plan's Implementation Strategies articulate priorities for SCAG to implement Connect SoCal 2024 by fulfilling or going beyond the related Regional Planning Policies. The SCAG related strategies represent near term efforts for the successful implementation of the Plan. These implementation strategies rely on partnership and support with agencies and decisions makers in the region.

## B.3 FINDINGS REQUIRED UNDER CEQA

### B.3.1 SUMMARY OF FINDINGS OF FACT

#### NO IMPACT OR LESS-THAN-SIGNIFICANT IMPACTS

As described in Section B.4, *Findings Regarding Potential Environmental Effects That Have No Impact or Are Less than Significant*, of this Findings of Fact, the impacts of Connect SoCal 2024 were determined to be less than significant in the following environmental resource categories:

- 3.2 Agriculture and Forestry Resources (AG-3 – Timberland and Timberland Production Zones)
- 3.3 Air Quality (AQ-1 – Plan consistency with federal transportation conformity requirements)
- 3.8 Greenhouse Gas Emissions (GHG-2 – Plan consistency with Senate Bill 375)

Note that each of these impacts were not separately identified but rather as components of larger categories of impacts: Impact AG-3 also includes forest land (which was found to be significantly impacted by the Plan); Impact AQ-1 addresses all air quality plans in the region and considers both regional and project-level impacts, only Plan's consistency with respect to regional transportation conformity was found to be less than significant); Impact GHG-2 addresses all plans applicable to the region that are aimed at reducing GHG emissions and addresses both regional and project level impacts, only Plan's consistency with SB 375 was found to be less than significant).

#### SIGNIFICANT IMPACTS

##### FINDINGS PURSUANT TO CEQA GUIDELINES SECTION 15091(A)

Consistent with the provisions of Section 15091(a)(1), changes and alterations have been required in, or incorporated into, the Plan, including SCAG mitigation measures, to avoid or substantially lessen the significant environmental effects of the Plan. SCAG has carefully considered the anticipated significant and unavoidable impacts of the Plan, as well as the benefits of adoption of the Plan. The benefits are summarized below.

Overall, the transportation investments in Connect SoCal 2024 will provide a return of \$2.00 for every dollar invested. Compared with an alternative of not adopting the Plan, the Plan would accomplish the following:

- The Plan reached the target of reducing greenhouse gas levels by 8 percent per capita by 2020 and would reach the target of a reduction of 19 percent by 2035 compared to 2005 levels. This would meet the state's SB 375 mandate.
- Regional air quality would improve under the Plan, as cleaner fuels and new vehicle technologies would help to significantly reduce many of the pollutants that contribute to smog and other airborne contaminants that may impact public health in the region.
- By 2050 public transit boardings are projected to nearly double in absolute numbers, and transit's mode share will also rise. The share of trips by bicycle and walking will also increase overall.
- The Plan would result in an increase in the percentage of the region's total housing and employment growth occurring within Priority Development Areas as compared to trend.

- In 2050, the number of vehicle miles traveled (VMT) per capita would be reduced by 6.3 percent less total regional VMT when compared to a no Plan scenario.
- The Plan would decrease regional VMT per capita (20.74 to 19.44) for automobiles and light duty trucks and person hours of delay per capita (8.2 minutes to 6.3 minutes) for automobiles and light duty trucks when compared to a no Plan scenario.
- The Plan would result in a decrease in delay metrics across the board, including minutes of delay per capita; person hours of delay on highways, HOV lanes, and arterials; delay hours for heavy duty trucks on highways and arterials; and mean commute time for all modes.
- The share of all trips using a travel mode other than single-occupancy vehicles would increase.
- The Plan would decrease the total amount of greenfield land consumed.
- The Plan would result in less energy and water used by residential and commercial buildings.

Consistent with the provisions of Section 15091(a)(2), changes and alterations capable of avoiding or substantially lessening the significant environmental effects of the Plan, identified as project-level mitigation measures, are within the responsibility and jurisdiction of lead agencies that will consider subsequent project-level approvals of transportation and development projects. SCAG has no authority to require specific mitigation measures at the project level given that local lead agencies have the sole discretion to determine which mitigation measures are applicable and feasible based on the location-specific circumstances. Nevertheless, SCAG reasonably assumes that local lead agencies do, and will continue to, exercise their discretionary authority (through local land use and other project permits and approvals) to implement sufficient feasible mitigation measures (and alternatives) identified through the CEQA process to avoid or reduce to the maximum extent practicable and feasible the significant direct, indirect, and cumulative impacts of subsequent projects.

In addition, state planning law specifically provides that nothing in an SCS supersedes the land use authority of local jurisdictions, and that local jurisdictions 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 (Govt. Code §65080(b)(2)(K)). Moreover, local jurisdictions have plenary authority to regulate land use through their police powers granted by the California Constitution, Art. XI, §7, and under several statutes, including the local planning law, the zoning law, and the Subdivision Map Act (Govt. Code Sections 65100–65763; Govt. Code Sections 65800–65912; Govt. Code Sections 66410–66499.37). With respect to the transportation projects in Connect SoCal 2024, these projects are to be implemented by Caltrans, CTCs, local transit agencies, and local jurisdictions (i.e., cities and counties), and not SCAG. Nonetheless, SCAG, as a lead agency, has a responsibility to identify feasible mitigation measures that are capable of avoiding or reducing the direct, indirect, and cumulative significant impacts of the Plan that can and should be considered by public agencies in their related discretionary decision related to subsequent project, including related reviews and consideration by trustee and responsible agencies. With respect to the Plan, SCAG has identified project level mitigation measures, or other comparable measures, which can and should be considered for incorporation into those projects as feasible and appropriate. Because project-mitigation activities are within the responsibility and jurisdiction of local and other agencies, the Regional Council hereby finds that such agencies can and should comply with the requirements of CEQA to mitigate the environmental impacts of the individual projects as feasible and appropriate. The Regional Council further finds that the project-level mitigation measures imposed by local and other agencies will collectively reduce the environmental impact, at the regional level, as feasible and appropriate.

## **SIGNIFICANT AND UNAVOIDABLE IMPACTS**

As described in Section B.5, *Findings Regarding Significant Unavoidable Adverse Impacts That Cannot Be Mitigated to a Level of Less than Significant*, of this Findings of Fact, the Plan was determined to have the potential to result in significant and unavoidable impacts in the following environmental resource categories:

- 3.1 Aesthetics (AES-1, -2, -3, and -4)
- 3.2 Agricultural and Forestry Resources (AG-1, -2, -3, -4, and -5)
- 3.3 Air Quality (AQ-1, -2, -3, and -4)
- 3.4 Biological Resources (Bio-1, -2, -4, -5 and -6)
- 3.5 Cultural Resources (CUL-1, -2, and -3)
- 3.6 Energy (EN-1 and -2)
- 3.7 Geology and Soils (GEO-1, -2, -3, -4, -5, and -6)
- 3.8 Greenhouse Gas Emissions (GHG-1 and -2)
- 3.9 Hazards and Hazardous Materials (HAZ-1, -2, -3, -4, -5, -6, and -7)
- 3.10 Hydrology and Water Quality (HYD-1, -2, -3A, -3B, -3C, -3D, -4, and -5)
- 3.11 Land Use and Planning (LU-1 and -2)
- 3.12 Mineral Resources (MIN-1 and -2)
- 3.13 Noise (NOI-1, -2, and -3)
- 3.14 Population and Housing (POP-1, and -2)
- 3.15 Public Services (PS-1, -2, -3, -4, and -5)
- 3.16 Parks and Recreation (REC-1 and -2)
- 3.17 Transportation, Traffic, and Safety (TRA-1, -2, and -4)
- 3.18 Tribal Cultural Resources (TCR-1)
- 3.19 Utilities and Service Systems (UTIL-1, -2, -3, -4, and -5)
- 3.20 Wildfire (WF-1, -2, -3, and -4)

### **B.3.2 CEQA ENVIRONMENTAL REVIEW**

The basic purposes of CEQA are to (1) inform decision makers and the public about the potential, significant adverse environmental effects of proposed governmental decisions and activities; (2) identify the ways those environmental effects can be avoided or significantly reduced; (3) prevent significant, avoidable, and adverse environmental effects by requiring changes in projects through the use of alternatives or mitigation measures when feasible; and (4) disclose to the public the reasons why an implementing agency may approve a project even if significant unavoidable environmental effects are involved.

An EIR uses a multidisciplinary approach, applying social and natural sciences to make a qualitative and quantitative analysis of all the foreseeable environmental impacts that a project might exert. As stated in CEQA Guidelines Section 15151:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.*

This 2024 Final EIR has been prepared in accordance with CEQA. The 2024 Final PEIR incorporates, by reference, the Draft PEIR (State Clearinghouse No. 2022100337) prepared by SCAG for Connect SoCal 2024 as it was originally published. In accordance with CEQA Guidelines Section 15132, the 2024 Final EIR shall consist of the following:

- The Draft PEIR or a revision of the draft.
- Comments and recommendations received on the Draft PEIR either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft PEIR.
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

Before SCAG may approve the Plan, it must certify the 2024 Final PEIR: (a) has been completed in compliance with CEQA; (b) was presented to the Regional Council who reviewed and considered it prior to approving the Project; and (c) reflects SCAG's independent judgment and analysis (CEQA Guidelines Section 15090).

CEQA Guidelines Section 15004 states before the approval of any project subject to CEQA, the Lead Agency must consider the final environmental document, which in this case is the 2024 Final PEIR.

## **NOTICE OF PREPARATION AND PUBLIC SCOPING**

A Notice of Preparation (NOP) for this 2024 PEIR was issued on October 17, 2022, by SCAG for a 30-day public review period. A total of 16 comment letters were received. Two scoping meetings were held on November 9, 2022, at 6:00 p.m. to 8:00 p.m., and on November 10, 2022, at 10:00 am to 12:00 pm. The purpose of these meetings was to provide early consultation for the public to express their concerns about the project and acquire information and make recommendations on issues to be addressed in the 2024 PEIR.

The NOP was sent to the State Clearinghouse on October 17, 2022; posted with the County Clerks for the six counties in the SCAG region; and distributed to various federal, state, regional and local government agencies, and other interested agencies, organizations, and individuals. The NOP was made available on SCAG's website at <https://scag.ca.gov/peir>. The NOP was published in 12 newspapers, including the *Los Angeles Times*, and additional newspapers that address the large geographic reach and diverse population within the SCAG region.

SCAG also hosted 20 in-person and seven virtual workshops on the Plan in spring of 2023. The goal of these events was to share the purpose of Connect SoCal 2024, introduce and provide information on policies and strategies under consideration, describe the performance outcomes of the different policy choices and receive input from participants.

## **NOTICE OF AVAILABILITY OF THE 2024 DRAFT PEIR**

In accordance with CEQA Guidelines Sections 15087 and 15105, the public review period for an EIR for a regionally significant project such as the Plan cannot be less than 45 days. The Draft PEIR was submitted to the State Clearinghouse Office of Planning and Research and was circulated for a 65-day public review period beginning on November 9, 2023, and ending on January 12, 2024 (SCH # 2022100337), and a Notice of Availability (NOA) was posted with each of the County Clerks for the six counties in the SCAG region. The NOA was circulated primarily using electronic mail to more than 7,900 interested parties. 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. Additionally, SCAG placed copies of the Draft PEIR at the offices of SCAG and posted the Draft PEIR on its website.

Responsible and trustee agencies and the public were invited to comment in writing on the information contained in the Draft PEIR. Persons and agencies commenting were encouraged to provide information that they believe is missing from the Draft PEIR and to identify where the information can be obtained. All comment letters received concerning the Draft PEIR have been responded to in writing, and the comment letters, together with the responses to those comments, are included in the 2024 Final PEIR.

## **RESPONSE TO COMMENTS ON THE 2024 DRAFT PEIR**

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 2024 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 by SCAG during the comment period. Among the 33 comment letters, there were 648 unique comments directly or indirectly related to the 2024 Draft PEIR. The responses do not significantly alter the Project, change the 2024 Draft PEIR's significance conclusions, or provide new information regarding substantial adverse environmental effects not already analyzed in the 2024 Draft PEIR. Instead, the information presented in the responses to comments "merely clarifies or amplifies or makes insignificant modifications" in the 2024 PEIR, as is permitted by CEQA Guidelines Section 15088.5(b).

In responding to comments, certain portions of the 2024 PEIR have been modified slightly for further clarification. The comments and modifications have not 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 2024 Draft PEIR (CEQA Guidelines Section 15088.5(a)). Consequently, SCAG finds the clarifications made to the 2024 Draft PEIR in the Final PEIR do not collectively or individually constitute significant new information within the meaning of PRC Section 21092.1 and CEQA Guidelines Section 15088.5. Recirculation of the 2024 PEIR or any portion thereof, is, therefore, not required.

The written responses to commenting public agencies shall be provided at least 10 days prior to the certification of the Draft PEIR (CEQA Guidelines Section 15088(b)). SCAG provided the 2024 Final PEIR to commenters on **March 25, 2024**, and made the document available for review on the Project web site at [www.scag.ca.gov/peir](http://www.scag.ca.gov/peir).

### **B.3.3 GENERAL FINDINGS**

Pursuant to PRC Section 21081 and CEQA Guidelines Section 15091, no public agency shall approve or carry out a project, for which an EIR has been certified, that identifies one or more significant effects on the environment that would occur if the project were approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project, which mitigate or avoid the significant effects on the environment.
- Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (The concept of infeasibility also encompasses whether a particular alternative or mitigation measure promotes the Project's underlying goals and objectives, and whether an alternative or mitigation measure is impractical or undesirable from a policy standpoint.) See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957; *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410.

SCAG has made one or more of these specific written findings regarding each significant impact associated with the Project. Those findings are in Section B.5, *Findings Regarding Significant Unavoidable Adverse Impacts That Cannot Be Mitigated to a Level of Less than Significant*, and Section B.6, *Findings Regarding Alternatives*, of this Findings of Fact, along with a presentation of facts in support of the findings. The Regional Council certifies these findings are based on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental issues identified and discussed.

The Connect SoCal 2024 PEIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. The degree of specificity in the 2024 PEIR corresponds to the specificity of the regional goals, policies, and strategies of the Plan. The 2024 PEIR approached the Plan as one project under CEQA, as a whole. The 2024 PEIR included an appropriately detailed and conservative (i.e., in a worst-case scenario) analysis of 20 environmental topics for the Project and its alternatives. The 2024 PEIR disclosed the environmental impacts expected to result from the adoption and implementation of the Plan. Feasible mitigation measures were identified to avoid or minimize significant environmental effects.

The adopted mitigation measures within the responsibility of SCAG appropriately mitigate impacts of Connect SoCal 2024 at the regional/programmatic level. The project-level mitigation measures adopted as part of the Plan can and should be implemented by lead agencies, as feasible and appropriate, to mitigate impacts at the project-level. Together, these mitigation measures mitigate the environmental impacts of the Plan to the maximum extent feasible as discussed in the findings made in Section B.5, *Findings Regarding Significant Unavoidable Adverse Impacts That Cannot Be Mitigated to a Level of Less than Significant*, of this Findings of Fact document. The findings in Section B.5 indicate where mitigation measures may not be capable of reducing impacts to below the level of significance.



In response to comments received, SCAG provided clarifications and revisions to the information contained in the 2024 Draft PEIR that was circulated for public review. All such changes made to the 2024 Draft PEIR are shown in the 2024 Final PEIR (Chapter 9, *Clarifications and Revisions*).

Since circulation of the 2024 Draft PEIR for public review, between publication of the Draft Connect SoCal 2024 and Final Connect SoCal 2024, updates to the Plan have been made. Clarifications were based on comments received during the comment period, input received through the outreach process, updated data and information that became available after the draft was released, and an additional internal review process. These clarifications and updates did not result in any significant changes to the impacts analyzed by the 2024 Draft PEIR, i.e., they do not collectively or individually constitute significant new information within the meaning of PRC Section 21092.1 and CEQA Guidelines Section 15088.5. A copy of the Final Connect SoCal 2024 Plan is available at [www.scag.ca.gov/connect-socal](http://www.scag.ca.gov/connect-socal).

Comments and input received through this process have assisted staff in refining and improving the final document, the underlying goals, objectives, policies as well as plan outcomes either improved or remained relatively unchanged between the draft and the final. A summary of key revisions between the Draft and Final Connect SoCal 2024 that are reassessed in the 2024 Final PEIR are provided below:

**Modifications to the Plan’s Goals.** The Plan includes four goals centered on mobility, communities, environment, and the economy which are designed to help SCAG achieve its vision for the region. In response to public comments, the Final Plan amends the Mobility goal from “Build and maintain a robust transportation network” to “Build and maintain an integrated multimodal transportation network.” No other changes were made to the Plan goals.

**Modifications to the Plan’s Regional Forecasted Development Pattern.** The Plan contains growth projections to determine the projected increase in population, households, and jobs, which serves as the foundation for the Forecasted Regional Development Pattern. The Plan utilized the Local Data Exchange (LDX) process to collect input on land use data and growth projections for households and employment directly from SCAG’s local jurisdictions. This process is documented in the Plan’s Demographics & Growth Forecast Appendix. During the LDX process, the County of Los Angeles had noted two regionally significant development projects for which they did not yet have an accurate growth estimate. During the public review and comment period for the Plan, the County of Los Angeles Planning Department provided updated direction on two large development projects located in the North County planning area of unincorporated Los Angeles County. Based on these updates, SCAG staff amended the household and employment growth projections for Los Angeles County for the Final Plan which then resulted in a slightly higher population, household and employment projection for the county and SCAG region. Table ES-1 in Appendix I presents the updated population, households, and employment for LA County. No other changes were made to the Plan growth projections or the Forecasted Regional Development Pattern. The changes to the draft growth projections are minor and subsequent changes to the modeling to reflect these changes are minimal as well, and did not affect the impact analysis or conclusions included in the PEIR. In addition, such change is well within the range of impacts analyzed for the Project and the associated alternatives described in Chapter 4 of the 2024 PEIR.

**Clarifications Regarding the Sustainable Communities Strategy.** Based on comments requesting language to explain project and plan consistency with the Plan’s Sustainable Communities Strategy (SCS), SCAG worked with stakeholders to refine and clarify consistency and/or alignment with the SCS as well as the limited role of Transportation Analysis Zone (TAZ) data. This clarification language is included in the Plan’s main document, the Demographics and Growth Forecast Technical Report, and the Land Use and Communities Technical Report.

**Modifications to the Connect SoCal 2024 Project List.** SCAG received input on the Draft Project List from six County Transportation Commissions (CTCs) during the Plan’s public comment period. The provided updates reflect the latest project information at the time and are part of the finalization process by SCAG and the CTCs for the Final Project List. The Plan includes over 2,000 individual projects and programs across the region across all modes of transportation over the next 25 years.

Generally, changes to the Project List include the following:

- Existing projects in the Project List that have:
  - A revised description (including completion year, cost, or minor change to scope), and/or
  - A revised schedule.
- Existing projects in the Project List which were requested to be removed.
- New projects that were not included in the Draft Project List.

Based on CTC-provided input, SCAG modified approximately 95 financially constrained projects. Most project revisions involved updates to cost or schedule, which in part was due to recent FTIP amendments that came after the draft was prepared. Only three new financially constrained projects were added to the Project List. The remaining updates were minor corrections such as lead agency updates or the removal of duplicate project entries. Separately from the 95 project modifications, SCAG applied 32 project revisions on the unconstrained portion of the Project List. Overall, project modifications result a less than 2 percent change in total projects.

Though changes were minor, SCAG re-ran the travel demand and emission model with the updated transportation network to reflect these updates to the Project List. Accordingly, the transportation modeling was updated for both the Final Plan and in the Final PEIR Appendix I. Revisions to the Project List, both the project modifications and three additions, have been determined to result in minor to no impacts on transportation modeling and the PEIR analysis or conclusions.

**Modeling Enhancements and Improvements.** The Plan’s performance is largely evaluated using a combination of modeling tools. The modeling results provide the basis for interpreting the anticipated outcomes of the Plan’s investments and strategies. The PEIR uses these modeling results to qualitatively and quantitatively identify and analyze potential environmental impacts at the regional level. Subsequent to the release of the 2024 Draft PEIR for public review and comment, minor modifications and refinements were made to the modeling conducted for the Plan, as described below.

## TRANSPORTATION MODEL

The SCAG transportation model has been enhanced to better accommodate the changes of future transit route patterns outlined in LA Metro’s NextGen bus plan (starting from 2025). Furthermore, the model has been augmented through the integration of a commuter rail access variable, aimed at more precisely capturing the improvements in service resulting from Metrolink’s Southern California Optimized Rail Expansion (SCORE) capital improvement program. This enhancement has resulted in an increase in transit boarding as well as the transit share, which correlates with the corresponding infrastructure enhancements, specifically the increase in revenue miles of transit services. The updated modeling results reflect the updated transportation network which includes the modifications to the Project List, as discussed above. The Plan outcome from these revisions resulted in

incremental improvement in VMT, delay and economic metrics that are discussed under the changes to Performance Measures section of the Final Connect SoCal 2024 document.

## SCENARIO PLANNING MODEL

The Scenario Planning Model (SPM) has been updated with an increased coverage of agricultural land that is consistent with important farmland areas determined by the Department of Conservation Farmland Mapping and Monitoring Program. In addition, SPM has been enhanced with updated development density data that better aligns with the Regional Planning Policies and regional growth vision. This update has fine-tuned the estimated benefits of the Plan on conservation opportunities and ecosystems.

## NOTABLE MODEL INPUT CHANGES AND UPDATES

- Socioeconomic data for LA County (refer to Final PEIR Chapter 9, Section 9.3.1, Category 1-B: Modifications to Plan's Regional Forecasted Development Pattern, for details)
- Auto Operating Cost – SCAG updated auto operating cost calculation based on new data and assumptions commented from the California Air Resources Board (CARB).
- Bike Lane Density – SCAG updated the variable using bikeway data received from the LDX process.
- Highway network – SCAG updated highway networks based on input from the CTCs (refer to Final PEIR Chapter 9, Section 9.3.1, Category 1-D: Modifications to Plan's Project List, for details on project changes)
- Ontario Airport Passenger Forecast – SCAG updated 2050 passenger forecast for Ontario international Airport (ONT) using Million Annual Passengers (MAP) received from their submitted public comment.

This technical transportation modeling updating process yields minor revisions to tables and maps in the 2024 Draft PEIR. PEIR Appendix I provides updated 2024 PEIR tables using the final modeling results for traffic, criteria pollutant emissions, GHG emissions and SPM data. These are the latest tables and should be used as the basis for future environmental reviews; they do not differ substantially from those circulated with the 2024 Draft PEIR and do not substantially affect the PEIR analyses or conclusions. For legibility, the updated tables are reproduced in their entirety and are not shown in underline or strikethrough mode.

The modeling rerun also made minor modifications to several maps that were duplicates or reproductions of Plan maps. Such maps were not reproduced in the Final PEIR as changes were minor at a regional level and the PEIR analysis is based on the underlying information including but not limited to the Growth Forecast, Project List, and/or other GIS resource data, not the maps themselves. Such changes are minor and do not substantially affect the PEIR analyses or conclusions. Nevertheless, for informational purposes, 2024 Final PEIR Appendix J includes a reference table where the reader can locate the related Plan maps which were updated as part of the Final Plan.

All updates result in minor changes and clarifications that do not substantially affect the PEIR analyses and do not impact the PEIR conclusions. These changes are well within the range of impacts analyzed for the Plan and the associated alternatives described in Chapter 4 of the 2024 PEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in CEQA Guidelines Section 15088.5.

**Modifications to the Plan’s Regional Planning Policies and Implementation Strategies.** In response to public comments, the Final Plan revises several of the Plan’s draft Regional Planning Policies and Implementation Strategies. Most of the revisions are minor and were made for clarification purposes. Refer to Chapter 3 of the Final Plan for the complete list of the Final Regional Planning Policies and Implementation Strategies.

**Modifications to Transportation Finance.** In accordance with federal fiscal constraint requirements, the Plan is financially constrained. Modifications to transportation finance resulting from modeling changes are very minor and largely do not affect the numbers presented in the PEIR since those were rounded. Furthermore, financial details do not affect the environmental analysis as they serve to provide the reader with background information on funding sources rather than information on physical changes to the environment.

Additional information and clarifications were identified in response to comments on the Draft PEIR and included in Chapter 8, *Response to Comments*, and Chapter 9, *Clarifications and Revisions*, of the 2024 Final PEIR.

The SCAG models described previously are used to provide gross estimates of regional environmental parameters (VMT, criteria pollutant emissions and GHG emissions). However, the inputs to these models are subject to variability (location and density of land uses, travel patterns, fuel make up, pricing assumptions and many more). Because of this, minor changes to assumptions result in minor changes to modeling results and are not statistically significant. As noted above, SCAG has made several refinements to the Connect SoCal 2024 Plan including to land use patterns, transportation projects and policies (alternatives would be similarly affected). None of these refinements result in significant changes to the information presented in the Draft PEIR, including modeling results.

Furthermore, these changes and additional information do not result in a finding of a new impact that was not analyzed in the Draft PEIR or result in a substantial increase in the severity of a significant impact identified in the Draft PEIR. They do not affect the conclusions regarding the significance of the impacts contained in the Draft PEIR. Thus, it is the finding of SCAG Regional Council that such changes and the revisions as described in the 2024 Final PEIR are clarifying in nature, and do not present any significant new information requiring recirculation or additional environmental review pursuant to CEQA Guidelines Section 15088.5.

An MMRP for the Plan has been prepared pursuant to the requirements of PRC Section 21081.6 and CEQA Guidelines Sections 15091(d) and 15097 to ensure implementation of the adopted mitigation measures to reduce significant effects on the environment and is included in the 2024 Final PEIR document. SCAG is the custodian of the documents and other material that constitute the record of the proceedings upon which certification of the 2024 PEIR for the Plan is based, as described below in Section B.9, *Findings Regarding Location and Custodian of Documents*, of this Findings of Fact.

It is the finding of SCAG Regional Council that the 2024 Final PEIR fulfills environmental review requirements for the Connect SoCal 2024 Plan; that the document constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA; and that the document reflects the independent judgment of the SCAG Regional Council.

## B.4 FINDINGS REGARDING POTENTIAL ENVIRONMENTAL EFFECTS THAT HAVE NO IMPACT OR ARE LESS THAN SIGNIFICANT

The analysis undertaken in support of the 2024 PEIR concludes that the Plan would have no impact or less-than-significant impacts in the following environmental resource categories and that no mitigation would be required:

- 3.2 Agriculture and Forestry Resources (AG-3 – Timberland and Timberland Production Zones)
- 3.3 Air Quality (AQ-1 – Regional Consistency with Federal Transportation Conformity Requirements)
- 3.8 Greenhouse Gas Emissions (GHG-2 – Regional Consistency with Senate Bill 375)

As noted above, each of these impacts were not separately identified but rather as components of larger categories of impacts: Impact AG-3 also includes forest land (which was found to be significantly impacted by the Plan); Impact AQ-1 addresses all air quality plans in the region and considers both regional and project-level impacts, only regional conformity was found to be less than significant; Impact GHG-2 addresses all plans applicable to the region that are aimed at reducing GHG emissions and addresses both regional and project level impacts, only regional consistency with SB 375 was found to be less than significant).

### B.4.1 AGRICULTURE AND FORESTRY RESOURCES

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**Impact AG-3** Potential for the Plan to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). (Timberland and Timberland Production Zones only.)

#### FINDING

The Plan would result in **no impact** to timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). Therefore, no mitigation is required.

#### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.2, *Agriculture and Forestry Resources*. No impacts regarding conflicts with existing zoning for timberland and Timberland Production would occur as no land zoned for these uses exists in the SCAG region.

## B.4.2 AIR QUALITY

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Impact AQ-1 Conflict with or obstruct implementation of the applicable air quality plan. (Regional consistency with federal transportation conformity requirements only.)

### FINDING

The Plan would result in **less-than-significant** impacts regarding regional consistency with federal transportation conformity requirements. Therefore, no mitigation is required.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.3, *Air Quality*. Based on the required transportation conformity analysis conducted for Connect SoCal 2024, the Plan demonstrates positive transportation conformity for the region. Specifically, the Plan passes the four required transportation conformity tests, namely, (1) regional emissions analysis [i.e., the Plan do not exceed any applicable emissions caps for all applicable air pollutants; for all applicable milestone, attainment, and planning horizon years; and in all nonattainment and maintenance areas within the SCAG region set forth in existing AQMPs/SIPs]; (2) fiscal constraint [i.e., the Plan demonstrates financial constraint in the financial plan by identifying all transportation revenues including local, state, and federal sources available to meet the region's programming totals]; (3) timely implementation of transportation control measures (TCMs) [i.e., all TCM projects and programs in the Plan were given funding priority, are expected to be implemented on schedule, and in the case of any delays, any obstacles to implementation have been or are being overcome], and (4) interagency consultation and public involvement [i.e., the Plan follows the strategies in SCAG's Public Participation Plan and conducts interagency consultation on the transportation conformity analysis for the Plan with SCAG's Transportation Conformity Working Group]. The transportation conformity determination for Connect SoCal 2024 is anticipated to receive final federal approval from FHWA/FTA in June 2024. See the Transportation Conformity Analysis Technical Report of Connect SoCal 2024 for more discussion. Therefore, the Plan is not expected to conflict with or obstruct implementation of the existing applicable air quality plans for federal transportation conformity purposes.

## B.4.3 GREENHOUSE GAS EMISSIONS

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Impact GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (Regional consistency with SB 375 only.)

### FINDING

The Plan would result in **less-than-significant** impacts regarding regional consistency with SB 375. Therefore, no mitigation is required.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.8, *Greenhouse Gas Emissions*. Based on the Plan's GHG analysis, the Plan has achieved the 8 percent per capita GHG emissions target for 2020 as set by CARB for the SCAG region for SB 375 purposes and will meet the 19 percent per capita GHG target for 2035 as discussed in Connect SoCal 2024, Performance Monitoring Technical Report. Decreased travel during the COVID-19 pandemic most likely helped achieve (and exceed) the 2020 target. By 2035, the Plan is projected to achieve the 19 percent below the 2005 level per capita GHG emissions target. In sum, the Plan has met the State requirements for the RTP/SCS under SB 375 and is considered not in conflict with SB 375 at the regional level.

## B.5 FINDINGS REGARDING SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS THAT CANNOT BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

As analyzed in the 2024 PEIR, SCAG has determined that the Plan has the potential to result in significant and unavoidable impacts in relation to the following environmental resource categories:

- 3.1 Aesthetics (AES-1, -2, -3, and -4)
- 3.2 Agricultural and Forestry Resources (AG-1, -2, -3, -4, and -5)
- 3.3 Air Quality (AQ-1, -2, -3, and -4)
- 3.4 Biological Resources (BIO-1, -2, -4, -5 and -6)
- 3.5 Cultural Resources (CUL-1, -2, and -3)
- 3.6 Energy (EN-1 and -2)
- 3.7 Geology and Soils (GEO-1, -2, -3, -4, -5, and -6)
- 3.8 Greenhouse Gas Emissions (GHG-1 and -2)
- 3.9 Hazards and Hazardous Materials (HAZ-1, -2, -3, -4, -5, -6, and -7)
- 3.10 Hydrology and Water Quality (HYD-1, -2, -3A, -3B, -3C, -3D, -4, and -5)
- 3.11 Land Use and Planning (LU-1 and -2)
- 3.12 Mineral Resources (MIN-1 and -2)
- 3.13 Noise (NOI-1, -2, and -3)
- 3.14 Population and Housing (POP-1 and -2)
- 3.15 Public Services (PS-1, -2, -3, -4, and -5)
- 3.16 Parks and Recreation (REC-1 and -2)
- 3.17 Transportation, Traffic, and Safety (TRA-1, -2, and -4)
- 3.18 Tribal Cultural Resources (TCR-1)
- 3.19 Utilities and Service Systems (UTIL-1, -2, -3, -4, and -5)
- 3.20 Wildfire (WF-1, -2, -3, and -4)

For each of these impacts, SCAG has identified program-level mitigation measures which are the responsibility of SCAG, as well as project-level mitigation measures which are the responsibility of local agencies. While SCAG has no authority to impose mitigation measures on local agencies and project sponsors, mitigation measures will be required by lead agencies at the project level if they identify potential impacts in the resource areas. At the project-level, lead agencies can and should consider the identified project-level mitigation measures during subsequent review of transportation and land use projects as appropriate and feasible. While the mitigation measures would reduce impacts of the Plan, they would not reduce the impacts to the level of less than significant.

## B.5.1 AESTHETICS

**Impact AES-1      Potential to have a substantial adverse effect on a scenic vista.**

### FINDING

SCAG finds that the Plan's impact on scenic vistas remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-AES-1**.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.1, *Aesthetics*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-AES-1 would reduce adverse effects on scenic vistas.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to scenic vistas, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

### MITIGATION MEASURES

#### SCAG MITIGATION MEASURES

**SMM-GEN-1** SCAG shall continue to facilitate interagency cooperation, information sharing, and regional program development, such as through existing planning tools to support local jurisdictions including various applications offered through the SCAG Regional Data Platform (RDP), SoCal Atlas, HELPR, and other GIS resources and data services. For more information, please contact SCAG's Local Information Services Team (LIST) at [list@scag.ca.gov](mailto:list@scag.ca.gov).



## PROJECT-LEVEL MITIGATION MEASURES

- PMM-AES-1** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
  - b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
  - c) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
  - d) Retain or replace trees bordering highways, so that clear-cutting is not evident.
  - e) Provide new corridor landscaping that provides appropriate transitions to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
  - f) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity.
  - g) Use see-through safety barrier designs (e.g., railings rather than walls), as appropriate.

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**Impact AES-2** Potential to substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

## FINDING

SCAG finds that the Plan's impact on scenic resources remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-AES-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.1, *Aesthetics*. Mitigation Measure **SMM-GEN-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-AES-1** would reduce adverse effects on scenic resources.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to damaging scenic resources within a state scenic highway, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AES-1.

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**Impact AES-3** Potential to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.

## FINDING

SCAG finds that the Plan's impact on visual character or quality of the SCAG region remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-AES-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.1, *Aesthetics*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-AES-2 would reduce adverse effects on visual character or quality of public views.

At the project-level, lead agencies can and should consider the identified project-level mitigation measure or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of the mitigation measures would reduce the adverse impacts related to the degradation of the existing visual character or quality of public views, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

## PROJECT-LEVEL MITIGATION MEASURES

- PMM-AES-2** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
  - b) Design landscaping along highway corridors to add substantial natural elements and visual interest to soften the hard-edged, linear transportation corridors.
  - c) Develop design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
  - d) Design projects consistent with design guidelines of applicable general plans.
  - e) Keep sites in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.
  - f) Where sound walls are proposed, account for visual impacts during sound wall construction and design methods as follows:
    - Use transparent panels to preserve views where sound walls would block views from residences;
    - Use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;
    - Construct sound walls of materials whose color and texture complements the surrounding landscape and development.
  - g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.

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**Impact AES-4** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

## FINDING

SCAG finds that the Plan's impact related to the potential to create new sources of light and glare remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the

implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1 and PMM-AES-3.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.1, *Aesthetics*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-AES-3 would reduce adverse effects related to new sources of light and glare.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to the potential create a new source of substantial light and glare that could adversely affect day or nighttime views in the areas, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

- PMM-AES-3** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Use lighting fixtures that are shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
  - b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7 a.m. to 10 p.m.
  - c) Use energy-efficient, low-glare fixtures for outdoor lighting.
  - d) Use unidirectional lighting to avoid light trespass onto adjacent properties.
  - e) Design exterior lighting to confine illumination to the project site, and/or to areas that do not include light-sensitive uses.
  - f) Provide structural and/or vegetative screening from light-sensitive uses.
  - g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
  - h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.

- i) Direct architectural lighting onto the building surfaces and have low reflectivity to minimize glare and limit light spillover onto adjacent properties.

## B.5.2 AGRICULTURE AND FORESTRY RESOURCES

**Impact AG-1** Potential for the Plan to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

### FINDING

SCAG finds that the Plan's impact on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-AG-1, SMM-AG-2, SMM-AG-3, and PMM-AG-1.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.2, *Agriculture and Forestry Resources*. Mitigation Measures SMM-AG-1, SMM-AG-2, and SMM-AG-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-AG-1 would reduce adverse effects on agricultural lands.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse effects on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

### MITIGATION MEASURES

#### SCAG MITIGATION MEASURES

**SMM-AG-1** SCAG shall provide support for local jurisdictions looking to pursue farmland conservation planning, including through information sharing and advice on grant opportunities pertinent to supporting local agency's workplans and/or actions in natural and agricultural land conservation, such as the Sustainable Agricultural Lands Conservation program.

**SMM-AG-2** SCAG shall continue to facilitate regional collaboration forums, such as the Natural & Farm Lands Conservation Working Group, for stakeholders to share best practices and develop recommendations for natural and agricultural land conservation throughout the region. The collaboration forums with help identify opportunities to leverage resources that protect and restore natural habitat corridors, especially, where corridors cross county boundaries.

**SMM-AG-3** SCAG shall develop and support a Regional Greenprint, which is a web-based tool that provides the best available scientific data and scenario visualizations to support local jurisdictions and transportation agencies make better land use and transportation infrastructure decisions and conserve natural and farm lands. SCAG shall provide the Greenprint as a publicly available tool to assist local jurisdictions and transportation agencies identify priority conservation areas and work with CTCs to develop advanced mitigation programs for their future plans and projects. SCAG shall support by (1) leveraging funding to encourage advance mitigation, (2) participating in state-level efforts that would support regional advanced mitigation planning in the SCAG region, and (3) supporting the inclusion of advance mitigation programs at county level transportation measures.

## PROJECT-LEVEL MITIGATION MEASURES

**PMM-AG-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Provide permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential to mitigate for loss of farmland.
- b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
- c) Maintain and expand agricultural land protections such as urban growth boundaries.
- d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.
- e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

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**Impact AG-2**      **Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.**

## FINDING

SCAG finds that the Plan's impact related to the potential to conflict with existing zoning for agricultural use, or a Williamson Act contract remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-AG-1, SMM-AG-2, SMM-AG-3, PMM-AG-1, and PMM-AG-2.**

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.2, *Agriculture and Forestry Resources*. Mitigation Measures SMM-AG-1, SMM-AG-2, and SMM-AG-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AG-1 and PMM-AG-2 would reduce conflicts with existing zoning for agricultural use, or a Williamson Act contract.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce conflicts with existing zoning for agricultural use, or a Williamson Act contract, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-AG-1 through SMM-AG-3.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AG-1.

**PMM-AG-2** Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:

- a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
- b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.

**Impact AG-3** Potential for the Plan to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). (Not including timberland and Timberland Production Zones – see Subsection B.4.1.)

## FINDING

SCAG finds that the Plan’s impact related to the potential to conflict with existing zoning for forest land (see Subsection B.4.1 for a discussion of the No Impact finding with respect to timberlands and timberland production Zones) remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-AG-1, SMM-AG-2, and PMM-AG-3**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.2, *Agriculture and Forestry Resources*. Mitigation Measures SMM-AG-1, SMM-AG-2, and PMM-AG-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-AG-3 would reduce the potential to conflict with existing zoning for forest land.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce conflicts with existing zoning for forest land or timber land, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG’s lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-AG-1** and **SMM-AG-2**.

### PROJECT LEVEL MITIGATION MEASURES

**PMM-AG-3** Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of forest land to maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:

- a) Minimize construction related impacts to forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with forestry resources.
- b) Acquire conservation easements for the loss of forestland.



- c) Coordinate with responsible agencies including the United States Forest Service and Bureau of Land Management, as appropriate, regarding applicable requirements for transportation and urban land use projects within designated National Monuments in the SCAG region.

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**Impact AG-4**      **Potential for the Plan to result in the loss of forest land or conversion of forest land to non-forest use.**

## FINDING

SCAG finds that the Plan's impact related to the loss of forest land or conversion of forest land to non-forest use remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-AG-1, SMM-AG-2, and PMM-AG-3.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.2, *Agriculture and Forestry Resources*. Mitigation Measures SMM-AG-1 and SMM-AG-2 would reduce impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-AG-3 would reduce adverse effects on scenic vistas.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to the loss of forest land or conversion of forest land to non-forest use, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-AG-1 and SMM-AG-2.

### PROJECT LEVEL MITIGATION MEASURES

See PMM-AG-3.

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**Impact AG-5**      **Potential for the Plan to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.**

## FINDING

SCAG finds that the Plan's impact remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies,

Implementation Strategies, and Mitigation Measures **SMM-AG-1** and **SMM-AG-2**, **SMM-GHG-1**, **SMM-GHG-2**, **PMM-AG-2**, **PMM-AG-4**, **PMM-AG-5**, and **PMM-GHG-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.2, *Agriculture and Forestry Resources*. Mitigation Measures SMM-AG-1 and SMM-AG-2; SMM-GHG-1 and SMM-GHG-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AG-2, PMM-AG-4, PMM-AG-5, and PMM-GHG-2 would reduce impacts related to the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to the loss of forest land or conversion of forest land to non-forest use, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-AG-1**, **SMM-AG-2**, **SMM-GHG-1**, and **SMM-GHG-2**.

### PROJECT-LEVEL MITIGATION MEASURES

See **PMM-AG-2** and **PMM-GHG-2**.

**PMM-AG-4** Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:

- a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
- b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
- c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.

- PMM-AG-5** Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:
- a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

### B.5.3 AIR QUALITY

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**Impact AQ-1** Conflict with or obstruct implementation of the applicable air quality plan. (Not including consistency with regional federal transportation conformity requirements – see Subsection B.4.2.)

#### FINDING

SCAG finds that the Plan’s impact related to potential project-level conflict with or obstruction of implementation of the applicable air quality plan (see Subsection B.4.2 for a discussion of the less-than-significant impact with respect to the Plan’s consistency with regional transportation conformity requirements) remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-AQ-1**, **SMM-GHG-1**, **SMM-GHG-2**, and **PMM-AQ-1**.

#### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.3, *Air Quality*. Mitigation Measures **SMM-AQ-1**, **SMM-GHG-1**, and **SMM-GHG-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-AQ-1** would reduce impacts related to a conflict with or obstruct implementation of the applicable air quality plan.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to a conflict with or obstruct implementation of the applicable air quality plan, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG’s lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GHG-1 and SMM-GHG-2.

**SMM-AQ-1** SCAG shall continue to support and provide information on regional air quality planning and related issue areas in the region. SCAG staff shall also continue to work with the U.S. Environmental Protection Agency, California Air Resources Board, and the air districts within the SCAG region and provide updates to relevant stakeholders on regional air quality planning and related issue areas through regional collaboration forums such as SCAG's Transportation Conformity Working Group.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-AQ-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce significant adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Minimize land disturbance.
- b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
- c) Cover trucks when hauling dirt.
- d) Stabilize the surface of dirt piles if not removed immediately.
- e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
- f) Minimize unnecessary vehicular and machinery activities.
- g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
- j) Assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower [hp] and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.
- k) Ensure that all construction equipment is properly tuned and maintained.
- l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.
- m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved

streets at least once per day where there is evidence of dirt that has been carried on to the roadway.

- n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
- p) Obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site.
- q) Use Tier 4 Final equipment or better for all engines above 50 hp. In the event that construction equipment cannot meet to Tier 4 Final or better engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the project's lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 Final or better engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible.
- r) Projects located within the South Coast Air Basin and the Coachella Valley should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.
- s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for identification of additional feasible mitigation that can be applied to individual projects.
- t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
- u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).

- v) As applicable for airport projects, the following measures should be considered:
  - Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxiing, if feasible as allowed per Federal Aviation Administration guidelines.
  - Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
  - Use ground service equipment (GSE) that can operate on battery-power. If using electric equipment is not feasible, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4 Final, at a minimum.
- w) As applicable for port projects, the following measures should be considered:
  - Develop specific timelines for transitioning to zero-emissions cargo handling equipment (CHE).
  - Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.
  - Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.
  - Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.
  - Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.
  - Encourage the participation in the Green Ship Incentives.
  - Offer incentives to encourage the use of on-dock rail.
- x) As applicable for rail projects, the following measures should be considered:
  - Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.
- y) 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. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.
- z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.
  - Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
  - Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
  - Disclose the potential increase in energy costs for running the HVAC system to prospective residents.

- Provide information to residents on where MERV filters can be purchased.
  - Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
  - Identify the responsible entity such as future residents themselves, Homeowner’s Association, or property managers for ensuring enhanced filtration units are replaced on time.
  - Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
  - Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
  - Develop a process for evaluating the effectiveness of the enhanced filtration units.
- aa) Consult the SCAG Equity Resources for Action (ERA) Toolbox SCAG Environmental Justice Toolbox available on the SCAG’s Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color.
- bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:
- Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
  - Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
  - Nonroad diesel engines on site shall be Tier 2 or higher.
  - Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
  - The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
    - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
    - ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
    - iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
  - Establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact

on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.

- Maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:
    - i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
    - ii. Any problems with the equipment or emission controls.
    - iii. Certified copies of fuel deliveries for the time period that identify:
      1. Source of supply
      2. Quantity of fuel
      3. Quantity of fuel, including sulfur content (percent by weight)
- cc) Promote energy efficiency and exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code):
- Install programmable thermostat timers
  - Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).
  - Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
  - Install higher efficacy public street and area lighting
  - Limit outdoor lighting requirements
  - Replace traffic lights with LED traffic lights
  - Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power
  - Utilize a combined heat and power system
- dd) Promote transportation efficiency. The following measures can be used to increase transportation efficiency:
- Locate project near bike path/bike lane
  - Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.
  - Provide traffic calming measures, such as:
    - i. Marked crosswalks
    - ii. Count-down signal timers
    - iii. Curb extensions
    - iv. Speed tables
    - v. Raised crosswalks



- vi. Raised intersections
- vii. Median islands
- viii. Tight corner radii
- ix. Roundabouts or mini-circles
- x. On-street parking
- xi. Chicanes/chokers
- Create urban non-motorized zones
- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:
  - i. Elimination (or reduction) of minimum parking requirements
  - ii. Creation of maximum parking requirements
  - iii. Provision of shared parking
- Require residential area parking permit.
- Provide ride-sharing programs
  - i. Designate a certain percentage of parking spacing for ride sharing vehicles
  - ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
  - iii. Providing a web site or messaging board for coordinating rides
  - iv. Permanent transportation management association membership and finding requirement.
- ee) Lengthen the construction period during smog season (May through October) by extending the construction hours per workday or number of days worked per week, to minimize the number of vehicles and equipment operating at the same time.
- ff) Install signage containing the complaint number of the local air district where construction activities are located at the construction sites.

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**Impact AQ-2      Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.**

## **FINDING**

SCAG finds that the Plan's impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and

with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-AQ-1, SMM-GHG-1, SMM-GHG-2, and PMM-AQ-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.3, *Air Quality*. Mitigation Measures SMM-AQ-1, SMM-GHG-1, and SMM-GHG-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-AQ-1 would reduce adverse effects on air quality standards.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-AQ-1, SMM-GHG-1, and SMM-GHG-2.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AQ-1.

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Impact AQ-3      Expose sensitive receptors to substantial pollutant concentrations.

## FINDING

SCAG finds that the Plan's impact related to exposing sensitive receptors to substantial pollutant concentrations remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, PMM-AQ-1, and PMM-AQ-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.3, *Air Quality*. Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AQ-1 and PMM-AQ-2 would reduce adverse impacts related to exposing sensitive receptors to substantial pollutant concentrations.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land

use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of mitigation measures would reduce adverse impacts related to exposing sensitive receptors to substantial pollutant concentrations, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AQ-1.

**PMM-AQ-2** For projects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one-quarter mile (1,320 feet) of a sensitive land use, project leads should prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project should incorporate feasible mitigation measures to reduce air pollutant emissions.

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**Impact AQ-4** Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

## FINDING

SCAG finds that the Plan's impacts related to other emissions (such as those leading to odors) remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-AQ-1, SMM-GHG-1, SMM-GHG-2, PMM-AQ-1, and PMM-AQ-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.3, *Air Quality*. Mitigation Measures SMM-AQ-1, SMM-GHG-1, and SMM-GHG-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AQ-1 and PMM-AQ-2 would reduce adverse effects related to other emissions (such as those leading to odors).

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures

would reduce impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-AQ-1, SMM-GHG-1, and SMM-GHG-2.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AQ-1.

**PMM-AQ-3** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to other emissions (such as those leading to odors) adversely affecting a substantial number of people. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Implement an odor management plan that consistent with the requirements from the local air quality management district or air pollution control district.
- b) Implement an odor control technique(s) or strategy(ies) consistent with the requirements from the local air quality management district or air pollution control district. Odor control techniques or strategies may include air filters, air scrubbers, enclosures, buzzer zones, physical barriers, housekeeping practices, or other techniques or strategies.

## B.5.4 BIOLOGICAL RESOURCES

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**Impact BIO-1** Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service.

### FINDING

SCAG finds that the Plan's effect on any species identified as a candidate, sensitive, or special status species remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-BIO-1 and PMM-BIO-1.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.4, *Biological Resources*. Mitigation Measures SMM-GEN-1 and SMM-BIO-1 would reduce project impacts to the maximum extent feasible within the

authority of SCAG. Project-Level Mitigation Measure PMM-BIO-1 would reduce adverse effects on any species identified as a candidate, sensitive, or special status species.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

**SMM-BIO-1** SCAG shall support research, programs, and policies that identify, protect, and restore natural habitat corridors and continue support for preserving wildlife corridors and wildlife crossings through information sharing, such as showcasing best practices and regional collaboration forums like SCAG's Natural and Farm Lands Conservation Working Group.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-BIO-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, and species that meet the definition of "rare" as defined in CEQA Guidelines Section 15380(b)(2). Such measures may include the following or other comparable measures identified by the lead agency:

- a) Avoid occupied habitat and potentially suitable habitat for threatened, endangered, or rare species, as well as designated critical habitat in project design, wherever practicable and feasible.

Where projects are determined to contain suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, prior to construction, conduct preconstruction focused species surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. If sensitive plants or wildlife are present, identify and implement species-specific measures to avoid, minimize, and mitigate for potential impacts in consultation with USFWS or CDFW.

- b) Where avoidance is determined to be infeasible for species protected under FESA, CESA, or local/regional species habitat conservation plan, provide conservation measures to result in no net loss of sensitive habitats and open space and fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as

identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special-status species may include:

- i. Impact minimization strategies
  - ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts
  - iii. Use of in-kind mitigation bank credits
  - iv. Funding of research and recovery efforts
  - v. Habitat restoration
  - vi. Establishment of conservation easements
  - vii. Permanent dedication of in-kind habitat
- c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
  - d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species
  - e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
  - f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
  - g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
  - h) Appoint a qualified biologist to monitor implementation of mitigation measures.
  - i) Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
  - j) Develop an invasive species control plan associated with project construction
  - k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife
  - l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
  - m) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings and may use alternatives to hydrocarbon-based asphalt paving to mitigate for potential hydrocarbon and heavy metal contamination.

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**Impact BIO-2** Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.

## FINDING

SCAG finds that the Plan's adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1, SMM-BIO-1, PMM-BIO-1, and PMM-BIO-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.4, *Biological Resources*. Mitigation Measures SMM-GEN-1 and SMM-BIO-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-BIO-1 and PMM-BIO-2 would reduce adverse effects on any riparian habitat or other sensitive natural community.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse effects on any riparian habitat or other sensitive natural community, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-GEN-1** and **SMM-BIO-1**.

### PROJECT-LEVEL MITIGATION MEASURES

See **PMM-BIO-1**.

**PMM-BIO-2** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.
- b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species

afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.

- c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.
- d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.
- e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.
- g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.
- h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.
- i) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to sensitive communities.
- j) Appoint a qualified biologist to monitor implementation of mitigation measures.
- k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist or regulatory specialist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.
- m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant to an adopted regional conservation plan.
- n) Install temporary construction fencing and/or mark sensitive habitat to be avoided during construction activities.
- o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified ecologist/biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils



containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified ecologist/biologist.

- p) Revegetate with appropriate indigenous native vegetation following the completion of construction activities, as identified by the qualified ecologist/biologist.
- q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).
- r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

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**Impact BIO-3** Have a substantial adverse effect on State or Federally Protected Wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

## FINDING

SCAG finds that the Plan's impact related to the potential to have a substantial adverse effect on State or Federally Protected Wetlands remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-BIO-1, PMM-BIO-1, PMM-BIO-2, and PMM-BIO-3.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.4, *Biological Resources*. Mitigation Measures SMM-GEN-1 and SMM-BIO-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-BIO-1, PMM-BIO-2, and PMM-BIO-3 would reduce adverse effects on State or Federally Protected Wetlands.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce adverse effects on State or Federally Protected Wetlands, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1 and SMM-BIO-1.

## PROJECT-LEVEL MITIGATION MEASURES

See PMM-BIO-1 and PMM-BIO-2.

**PMM-BIO-3** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities. Such measures may include the following or other comparable measures identified by the lead agency:

In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands. Such measures may include the following or other comparable measures identified by the lead agency.

- a) Conduct an aquatic resources delineation by a qualified biologist or regulatory specialist to identify and map the extent of state and federally protected aquatic resources. Avoid state and federally protected aquatic resources in project design, consistent with the provisions of Sections 404 and 401 of the CWA and Section 1600 of Fish and Game Code, wherever practicable and feasible.
- b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered waters of the state of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.
- c) Where avoidance of wetlands is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE or SAA by the CDFW. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with USACE's Final Compensatory Mitigation Rule or the CDFW SAA conditions. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as feasible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance, or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The rule establishes performance standards, sets timeframes for decision making, and to the maximum extent feasible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:
  - Permittee-responsible mitigation
  - Contribution of in-lieu fees
  - Use of in-kind mitigation bank credits

- d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
- Avoidance
  - Impact Minimization
  - On-site alternatives
  - Off-site alternatives
- e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

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**Impact BIO-4**      **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.**

## FINDING

SCAG finds that the Plan's impact related to interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **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.**

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.4, *Biological Resources*. Mitigation Measures SMM-GEN-1, SMM-AG-1 through SMM-AG-3, SMM-GHG-1, SMM-LU-3, and SMM-WF-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-BIO-1 through PMM-BIO-4 would reduce adverse impacts related to the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable.**

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-AG-1 through SMM-AG-3, SMM-GHG-1, SMM-LU-3, and SMM-WF-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-BIO-1 through PMM-BIO-3.

- PMM-BIO-4** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
  - b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.
  - c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 Section 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
  - d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.
  - e) Prohibit construction activities within 300 feet, or modified as appropriate by a qualified biologist, of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
  - f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
  - g) When feasible and practicable, minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors in project design.
  - h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.
  - i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.
  - j) Review construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.

- k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).
- l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities.
- n) Install directional wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the temporal or permanent loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in PMM-BIO-1(b), where applicable:
  - Wildlife movement buffer zones
  - Corridor realignment
  - Appropriately spaced breaks in center barriers
  - Stream rerouting
  - Culverts
  - Creation of artificial movement corridors such as freeway under- or overpasses
  - Acquire contiguous adjacent land parcels to be protected in perpetuity from encroachment and development
  - Other comparable measures
- p) Where the lead agency has identified that an RTP/SCS project, or other regionally significant project, has the potential to impact open space or wildlife nursery site areas that are not designated as such by federal, state, or local jurisdictions, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- q) Incorporate applicable and appropriate guidance (e.g., FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.
- r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.
- s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as but not limited to:
  - Use high-pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.

- Design exterior lighting to confine illumination to the project site.
  - Provide structural and/or vegetative screening from light-sensitive uses.
  - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
  - Direct architectural lighting onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:
- Install temporary noise barriers during construction.
  - Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
  - Provide structural and/or vegetative screening from light-sensitive uses.
  - Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
  - Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
  - Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned
  - Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
  - Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- u) Include large buffers between sensitive uses and freeways.
- v) Create wildlife corridor redundancy to help retain functional connectivity and resilience.
- w) To the extent practicable, avoid construction during dawn and dusk, when wildlife activity is highest.

- y) If protected terrestrial wildlife enter work areas during construction, temporarily halt work to allow wildlife to move through the work area unharmed. A qualified biologist may relocate non-listed wildlife species out of the work area.

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**Impact BIO-5**      **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.**

## FINDING

SCAG finds that the Plan's impact related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-BIO-1, SMM-LU-3, and PMM-BIO-1 through PMM-BIO-5.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.4, *Biological Resources*. Mitigation Measures SMM-GEN-1, SMM-BIO-1, and SMM-LU-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-BIO-1 through PMM-BIO-5 would reduce adverse effects related to conflicts with any local policies or ordinances protecting biological resources.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-BIO-1, and SMM-LU-3.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-BIO-1 through PMM-BIO-4.

- PMM-BIO-5** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources. Such measures may include the following or other comparable measures identified by the lead agency.
- a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
  - b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.
  - c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally sourced native species, as directed by a qualified biologist.
  - d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas where trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to avoid resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
  - e) Establish a scheme for the removal and disposal of logs, brush, earth, and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.
  - f) No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees to occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. No heavy construction equipment or construction materials to be operated or stored within a distance from the base of any protected trees. Wires, ropes, or other devices not to be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
  - g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.
  - h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If such tree cannot be preserved in a healthy state, as determined by the certified arborist, replace any tree removed with another tree or trees on the same site deemed adequate by the local agency to



compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation or as determined by the local jurisdictions, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources

- i) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
- Avoidance strategies
  - Contribution of in-lieu fees
  - Planting of replacement trees
  - Re-landscaping areas with native vegetation post-construction
  - Other comparable measures developed in consultation with local agency and certified arborist.

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**Impact BIO-6**      **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.**

## FINDING

SCAG finds that the Plan's impact related to conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-BIO-1, SMM-LU-3, and PMM-BIO-1 through PMM-BIO-6.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.4, *Biological Resources*. Mitigation Measures SMM-GEN-1, SMM-BIO-1, and SMM-LU-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-BIO-1 through PMM-BIO-6 would reduce adverse impacts related to conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce adverse impacts related to conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## B.5.5 CULTURAL RESOURCES

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**Impact CUL-1** Cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5.

### FINDING

SCAG finds that the Plan's impact related to a substantial adverse change in the significance of a historical resource remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-CUL-1, and PMM-CUL-1.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.5, *Cultural Resources*. Mitigation Measures SMM-GEN-1 and SMM-CUL-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-CUL-1 would reduce adverse impacts on historical resources.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects on historical resources, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

### MITIGATION MEASURES

#### SCAG MITIGATION MEASURES

See SMM-GEN-1.

**SMM-CUL-1** SCAG shall encourage local jurisdictions to identify opportunities for early consultation with resource agencies such as the National Park Service, Office of Historic Preservation, and Native American Heritage Commission, as well as Native American tribes, for identification and avoidance of archaeological sites, historical resources, cemeteries, and tribal cultural resources, wherever practicable and feasible and reduce or mitigate for conflicts in compatible land use to the maximum extent practicable.

## PROJECT-LEVEL MITIGATION MEASURES

- PMM-CUL-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources. Such measures may include the following or other comparable measures identified by the lead agency:
- a. Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the Plan area has been previously surveyed and whether historical resources were identified.
  - b. During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.
  - c. Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
    - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
    - Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
  - d. If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent feasible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the Secretary of the Interior's PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the lead agency for review and approval.
  - e. If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the Secretary of the Interior's PQS. Recordation should meet the Secretary of the Interior's Standards and Guidelines for Architectural and

Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the lead agency.

- f. During the project planning phase, obtain a qualified archaeologist, defined as one who meets the Secretary of the Interior's PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the Plan area has been previously surveyed and whether resources were identified.
- g. Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.
- h. During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the lead agency, or the Information Center. In the event the records indicate that no previous survey has been conducted, the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the Plan area for archaeological resources.
- i. If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources are determined significant or unique through Phase II testing, and avoidance is not feasible, appropriate resource-specific mitigation measures should be established by the lead agency and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Archaeological materials collected from a significant resource should be curated with a recognized scientific or educational repository.
- j. If a record search or archaeological assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the lead agency in consultation with a qualified archaeologist, retain an archaeological monitor to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the Secretary of the Interior's PQS
- k. Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.
- l. Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant. If the

archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository.

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**Impact CUL-2** Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5.

## FINDING

SCAG finds that the Plan's impact on the significance of an archaeological resource remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1**, **SMM-CUL-1**, and **PMM-CUL-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.5, *Cultural Resources*. Mitigation Measures SMM-GEN-1 and SMM-CUL-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-CUL-1 would reduce adverse impacts on the significance of an archaeological resource.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects on archaeological resources, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1 and SMM-CUL-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-CUL-1.

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**Impact CUL-3** Disturb human remains, including those interred outside of dedicated cemeteries.

## FINDING

SCAG finds that the Plan's impact remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1**, **SMM-CUL-1**, and **PMM-CUL-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.5, *Cultural Resources*. Implementation of Mitigation Measures SMM-GEN-1 and SMM-CUL-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-CUL-2 would reduce the potential to disturb human remains.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects on potential to disturb human remains, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1 and SMM-CUL-1.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-CUL-2** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains. Such measures may include the following or other comparable measures identified by the lead agency:

- a. In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
- b. If any discovered remains are of Native American origin:
  - Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.
  - If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave

goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

## B.5.6 ENERGY

**Impact ENR-1** Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

### FINDING

SCAG finds that the Plan's impact due to wasteful, inefficient, or unnecessary consumption of energy resources remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-AQ-1, SMM-GHG-1, SMM-GHG-2, PMM-AQ-1, PMM-GHG-1, PMM-TRA-1, and PMM-USWS-1.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.6, *Energy*. The wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation would be significant. Implementation of Mitigation Measures SMM-AQ-1, SMM-GHG-1, and SMM-GHG-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AQ-1, PMM-GHG-1, PMM-TRA-1, and PMM-USWS-1 would reduce adverse impacts related to wasteful, inefficient, or unnecessary consumption of energy resources.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

### MITIGATION MEASURES

#### SCAG MITIGATION MEASURES

See SMM-AQ-1, SMM-GHG-1, and SMM-GHG-2.

#### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AQ-1, PMM-GHG-1, PMM-TRA-1, and PMM-USWS-1.

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**Impact ENR-2**      **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.**

## **FINDING**

SCAG finds that the Plan’s impact related to a conflict with or obstruct a state or local plan for renewable energy or energy efficiency remains significant and unavoidable even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-AQ-1, SMM-GHG-1, SMM-GHG-2, SMM-LU-1, PMM-AQ-1, PMM-GHG-1, PMM-TRA-1, and PMM-USWS-1.

## **RATIONALE**

The above finding is made based on the analysis included in PEIR Section 3.6, *Energy*. Mitigation Measures SMM-AQ-1, SMM-GHG-1, SMM-GHG-2, and SMM-LU-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AQ-1, PMM-GHG-1, PMM-TRA-1, and PMM-USWS-1 would reduce impacts related to conflict with or obstruct a state or local plan for renewable energy or energy efficiency. At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG’s lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## **MITIGATION MEASURES**

### **SCAG MITIGATION MEASURES**

See SMM-AQ-1, SMM-GHG-1, SMM-GHG-2, and SMM-LU-1.

### **PROJECT-LEVEL MITIGATION MEASURES**

See PMM-AQ-1, PMM-GHG-1, PMM-TRA-1, and PMM-USWS-1.



## B.5.7 GEOLOGY AND SOILS

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**Impact GEO-1** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides.

### FINDING

SCAG finds that the Plan's potential to cause substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-GEO-1**.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.7, *Geology and Soils*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-GEO-1 would reduce adverse impacts including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-GEO-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to minimize the potential for adverse effects associated with surface fault rupture, seismic ground shaking, seismic-related ground failure, liquefaction, and landslides for projects located on sites with unusual geologic conditions, the following measures shall be considered:

- Use interim precautionary steps during construction to maintain ground surface and slope stability;
- Incorporate design and structural features that exceed the requirements of the applicable building code(s) as appropriate; and
- Utilize innovative design techniques for buildings and other structural elements located on sites with unique geologic conditions to ensure that projects do not exacerbate risks associated with existing conditions.

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**Impact GEO-2** Result in substantial soil erosion or the loss of topsoil.

## FINDING

SCAG finds that the Plan's impact related to the potential to result in substantial soil erosion or the loss of topsoil remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1 and PMM-GEO-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.7, *Geology and Soils*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-GEO-2 would reduce adverse impacts related to substantial soil erosion or the loss of topsoil.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to substantial soil erosion or the loss of topsoil, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains significant and unavoidable.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-GEO-2** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geologic hazards. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) While compliance with the various municipal regional stormwater permits (MS4) is required by law, not all areas are necessarily covered. For those areas that are not covered under a municipal stormwater permit (MS4), consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by stormwater. Road cuts should be designed to maximize the potential for revegetation.

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**Impact GEO-3** Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

## FINDING

SCAG finds that the Plan's impact related to being located a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-GEO-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.7, *Geology and Soils*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-GEO-1 would reduce adverse impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence,

liquefaction, or collapse, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-GEO-1.

Impact GEO-4     Be located on expansive soil creating substantial risks to life or property.

## FINDING

SCAG finds that the Plan's impact related to being located on expansive soil remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1 and PMM-GEO-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.7, *Geology and Soils*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-GEO-1 would reduce adverse impacts related to expansive soil.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to expansive soil, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-GEO-1.

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**Impact GEO-5** Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

## FINDING

SCAG finds that the Plan's impact related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measure SMM-GEN-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.7, *Geology and Soils*. Mitigation Measure SMM-GEN-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG.

While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measure would reduce impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

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**Impact GEO-6** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

## FINDING

SCAG finds that the Plan's impact related to the potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measure PMM-GEO-3.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.7, *Geology and Soils*. Mitigation Measure PMM-GEO-3 would reduce adverse impacts related to the potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce adverse effects on a unique paleontological resources or sites or unique geological features, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-GEO-3** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For sites where the presence of paleontological resources is considered possible, as appropriate obtain review by a qualified paleontologist (meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.
- b) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- c) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
  - 1) All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
  - 2) A qualified paleontologist prepares a paleontological resources management plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.
  - 3) Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of SVP or BLM to determine if unique paleontological resources

are encountered during such activities, consistent with the specified or comparable protocols.

- 4) Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
- d) Avoid routes and project designs that would permanently alter unique geological features.
- e) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.
- f) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.
- g) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the CEQA lead agency and the repository curating the collected artifacts and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

## B.5.8 GREENHOUSE GAS EMISSIONS

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**Impact GHG-1**      **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.**

### FINDING

SCAG finds that the Plan's impact related to the generation of greenhouse gas emissions remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-AQ-1**, **SMM-GHG-1**, **SMM-GHG-2**, and **PMM-GHG-1**.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.8, *Greenhouse Gas Emissions*. Mitigation Measures **SMM-AQ-1**, **SMM-GHG-1**, and **SMM-GHG-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-GHG-1** would reduce direct and indirect adverse impacts with regard to GHG emissions.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the Plan's potential to generate GHGs, due to the regional nature of the analysis,

unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-AQ-1.

**SMM-GHG-1** SCAG, in partnership with local air districts, shall continue to work with local jurisdictions to adopt qualified GHG reduction plans (e.g., climate action plans [CAPs]), develop GHG-reducing planning policies, and support local implementation of climate initiatives.

**SMM-GHG-2** SCAG shall measure and track sustainability progress in the region and foster collaboration through the sharing of best practices across the 191 cities and six counties in the SCAG region (including across SB 535 Disadvantaged Communities) and identify opportunities for improving sustainability practices.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-GHG-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:
  - i) Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
  - ii) Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
  - iii) Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
  - iv) Incorporate passive environmental control systems that account for the characteristics of the natural environment.
  - v) Use high-efficiency lighting and cooking devices.
  - vi) Incorporate passive solar design.
  - vii) Use high-reflectivity building materials and multiple glazing.
  - viii) Use no gas-powered landscape maintenance equipment.
  - ix) Install alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations.
  - x) Reduce wood burning stoves or fireplaces.
  - xi) Provide bike lanes accessibility and parking at residential developments.



- xii) Encourage projects to reduce natural gas infrastructure in buildings and/or reduce the use of natural gas appliances, with exceptions for limited uses.
- b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- c) Include off-site measures to mitigate a project's emissions.
- d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to:
  - i) Use energy and fuel-efficient vehicles and equipment;
  - ii) Deployment of zero- and/or near-zero-emission technologies;
  - iii) Use lighting systems that are energy efficient, such as LED technology;
  - iv) Use the minimum feasible amount of GHG-emitting construction materials;
  - v) Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
  - vi) Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
  - vii) Incorporate design measures to reduce energy consumption and increase use of renewable energy;
  - viii) Incorporate design measures to reduce water consumption;
  - ix) Use lighter-colored pavement where feasible;
  - x) Recycle construction debris to maximum extent feasible;
  - xi) Plant shade trees in or near construction projects where feasible; and
  - xii) Solicit bids that include concepts listed above.
- e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
  - i) Promote transit-active transportation coordinated strategies;
  - ii) Increase bicycle carrying capacity on transit and rail vehicles;
  - iii) Improve or increase access to transit;
  - iv) Increase access to common goods and services, such as groceries, schools, day care, and medical care;
  - v) Incorporate housing, including affordable housing, into the project;
  - vi) Incorporate a neighborhood electric vehicle network; vii) Orient the project toward transit, bicycle, and pedestrian facilities;
  - viii) Improve pedestrian or bicycle networks, or transit service;
  - ix) Provide traffic calming measures;

- x) Provide bicycle parking;
- xi) Limit or eliminate park supply;
- xii) Unbundle parking costs;
- xiii) Provide parking cash-out programs;
- xiv) Implement or provide access to commute reduction program;
- f) Incorporate bicycle and pedestrian facilities into project designs, maintain these facilities, and provide amenities incentivizing their use; and plan for and constructing local bicycle projects that connect with the regional network;
- g) Improve transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations;
- h) Adopt employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, provide end-of-trip facilities, and telecommuting programs including but not limited to measures that:
  - i) Provide car-sharing, bike sharing, and ride-sharing programs;
  - ii) Provide transit passes;
  - iii) Shift single occupancy vehicle trips to carpooling or vanpooling, for example by providing ride-matching services;
  - iv) Provide incentives or subsidies that increase use of modes other than single-occupancy vehicle;
  - v) Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
  - vi) Provide employee transportation coordinators at employment sites;
  - vii) Provide a guaranteed ride home service to users of non-auto modes.
- i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- j) Land use siting and design measures that reduce GHG emissions, including:
  - i) Developing on infill and brownfields sites;
  - ii) Building compact and mixed-use developments near transit;
  - iii) Retaining on-site mature trees and vegetation, and planting new canopy trees;
  - iv) Measures that increase vehicle efficiency, encourage use of zero- and low-emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations or neighborhood alternative fuel vehicle networks, or charging for electric bicycles;
  - v) Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; and

- vi) Establish methane recovery in Landfills and Wastewater Treatment Plants, where applicable.
- k) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color.
- l) Require at least five percent of all new vehicle parking spaces include alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations, or at a minimum, install the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Encourage electric vehicle capable (branch circuit and raceway) or ready (charging outlet) spaces to accommodate future growth in electric vehicles.
- m) Encourage telecommuting and alternative work schedules, such as:
  - i) Staggered starting times
  - ii) Flexible schedules
  - iii) Compressed work weeks
- n) Implement commute trip reduction marketing, such as:
  - i) New employee orientation of trip reduction and alternative mode options
  - ii) Event promotions
  - iii) Publications
- o) Implement preferential parking permit program
- p) Implement school pool and bus programs
- q) Price workplace parking, such as:
  - i) Explicitly charging for parking for its employees
  - ii) Implementing above market rate pricing
  - iii) Validating parking only for invited guests
  - iv) Not providing employee parking and transportation allowances
- r) Educating employees about available alternatives.

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**Impact GHG-2**    **Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (Not including regional consistency with SB 375 – see Subsection B.4.3.)**

## FINDING

SCAG finds that the Plan's impact related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (see Subsection B.4.3 for a discussion of the less-than-significant impact with respect to regional consistency with SB 375) remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional

Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-AQ-1**, **SMM-GHG-1**, **SMM-GHG-2**, and **PMM-GHG-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.8, *Greenhouse Gas Emissions*. Mitigation Measures **SMM-AQ-1**, **SMM-GHG-1**, and **SMM-GHG-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-GHG-1** would reduce direct and indirect adverse impacts with regard to GHGs.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-AQ-1**, **SMM-GHG-1**, and **SMM-GHG-2**.

### PROJECT-LEVEL MITIGATION MEASURES

See **PMM-GHG-1**.

## B.5.9 HAZARDS AND HAZARDOUS MATERIALS

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Impact **HAZ-1** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

## FINDING

SCAG finds that the Plan's impact related to the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1**, **SMM-HAZ-1**, and **PMM-HAZ-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*. Mitigation Measures **SMM-GEN-1** and **SMM-HAZ-1** would reduce project impacts to the maximum extent feasible

within the authority of SCAG. Project-Level Mitigation Measure PMM-HAZ-1 would reduce adverse impacts related to the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to the potential to create a significant hazard to the public or the environment through routine transport or use of hazardous materials, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

**SMM-HAZ-1** SCAG shall work with the Caltrans and the California Highway Patrol to continue to reduce risks associated with the transport of hazardous materials in the SCAG region, through its Consultation role assisting in the development of routes designated for hazardous materials, specifically related to radioactive materials.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-HAZ-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials and hazardous materials releases, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Reduce train speeds when train cars contain hazardous material to 40 miles per hour when passing through urbanized areas of any size.
- b) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
- c) Notify in advance county and city emergency operations offices of all crude oil rail transports, including a contact number that can provide real-time information in the event of an oil train derailment or accident.
- d) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.
- e) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.
- f) Undertake annual emergency responses scenario/field-based training including Emergency Operations Center Training activations with local emergency response agencies.

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**Impact HAZ-2** Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

## **FINDING**

SCAG finds that the Plan's impact related to the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1, SMM-HAZ-1, and PMM-HAZ-1**.

## **RATIONALE**

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*. Mitigation Measures SMM-HAZ-1 through SMM-HAZ-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-HAZ-1 would reduce adverse impacts related to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## **MITIGATION MEASURES**

### **SCAG MITIGATION MEASURES**

See **SMM-GEN-1** and **SMM-HAZ-1**.

### **PROJECT-LEVEL MITIGATION MEASURES**

See **PMM-HAZ-1**.

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**Impact HAZ-3** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

## FINDING

SCAG finds that the Plan's impact related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HAZ-1, PMM-HAZ-1, and PMM-HAZ-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*. Mitigation Measure SMM-HAZ-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-HAZ-1 and PMM-HAZ-2 would reduce adverse impacts related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HAZ-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HAZ-1.

**PMM-HAZ-2** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within 0.25 miles of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within 0.25 miles of schools, when school is in session, wherever feasible.

- b) Where it is not feasible to avoid transport of hazardous materials, within 0.25 miles of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

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**Impact HAZ-4** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

## FINDING

SCAG finds that the Plan's impact related to creating a significant hazard to the public or environment located on hazardous materials sites remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-HAZ-1** and **PMM-HAZ-3**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*. Mitigation Measure **SMM-HAZ-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-HAZ-3** would reduce adverse effects related to creating a significant hazard to the public or environment located on hazardous materials sites.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to creating a significant hazard to the public or environment located on hazardous materials sites, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-HAZ-1**.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-HAZ-3** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site that is included on the Cortese List of hazardous waste and substances sites, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review



and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.

- b) If warranted by the Phase I report, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Professional Geologist or Professional Engineer.
- c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the USEPA to determine the extent of potential contamination beneath all underground storage tanks, elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.
- f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination (including dewatering effluent), or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- h) Cease work if soil, groundwater (including dewatering effluent), or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.
- i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state, and federal laws and policies.
- j) Groundwater (including dewatering effluent) pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure

environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.

- k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board, have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.
- m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations Title 8; Business and Professions Code; Division 3; California Health and Safety Code Sections 25915–25919.7; and other local regulations.
- n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, LBP, and any other building materials or stored materials classified as hazardous waste by state or federal law.
- o) Where the remediation of LBP has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration’s Construction Lead Standard, CCR Title 8 Section 1532.1 and Department of Health Services Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

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**Impact HAZ-5** For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.

## FINDING

SCAG finds that the Plan's impact related to safety hazards or excessive noise within an airport land use plan or within two miles of a public airport remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-NOI-1**, **SMM-HAZ-2**, and **PMM-NOI-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*. Mitigation Measures SMM-NOI-1 and SMM-HAZ-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-NOI-1 would reduce adverse impacts related to safety hazards or excessive noise within an airport land use plan or within two miles of a public airport.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse impacts related to safety hazards or excessive noise within an airport land use plan or within two miles of a public airport, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-NOI-1.

**SMM-HAZ-2** SCAG shall continue to collaborate with stakeholders on regional aviation planning issues through the Aviation Technical Advisory Committee (ATAC). The ATAC is a partnership between the airports, transportation agencies and commissions, experts, and other community members within the SCAG region.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-NOI-1.

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**Impact HAZ-6    Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.**

**FINDING**

SCAG finds that the Plan’s impact related to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, SMM-TRA-1, PMM-HAZ-1 through PMM-HAZ-3, and PMM-HAZ-4.

**RATIONALE**

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*. Mitigation Measures SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, and SMM-TRA-1. Project-Level Mitigation Measures PMM-HAZ-1 through PMM-HAZ-3 and PMM-HAZ-4 would reduce adverse impacts related to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG’s lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

**MITIGATION MEASURES**

**SCAG MITIGATION MEASURES**

See SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, and SMM-TRA-1.

**PROJECT-LEVEL MITIGATION MEASURES**

See PMM-HAZ-1 through PMM-HAZ-3.

**PMM-HAZ-4** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.

- Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.
- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
  - Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
  - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
  - Scheduling of truck trips outside of peak morning and evening commute hours.
  - Limiting of lane closures during peak hours to the maximum extent feasible.
  - Usage of designated haul routes to minimize truck traffic on local roadways to the maximum extent feasible.
  - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
  - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
  - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
  - Storage of construction materials only in designated areas.
  - Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
  - Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
  - Enhance emergency preparedness awareness among public agencies and with the public at large.

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**Impact HAZ-7** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

## FINDING

SCAG finds that the Plan's impact related to the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-WF-1, SMM-GEN-1, SMM-HAZ-1, SMM-HAZ-2, SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, PMM-WF-1, and PMM-WF-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.20, *Wildfire*. Mitigation Measures SMM-WF-1, SMM-GEN-1, SMM-HAZ-1, SMM-HAZ-2, SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-WF-1 and PMM-WF-1 would reduce adverse impacts related to the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-HAZ-1, SMM-HAZ-2, SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

**SMM-WF-1** SCAG shall continue to provide a regional forum for collaboration in planning, communication, and information sharing on best practices around wildfire resilience.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HAZ-5.

**PMM-WF-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce

wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.
- b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
- c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.
- d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.
- e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
- f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.
- g) Include external sprinklers with an independent water source to reduce flammability of structures.
- h) Include local solar power paired with batteries to reduce power flow in electricity lines.
- i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.
- j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.
- k) Developments in fire-prone areas should have fire-resistant feature, such as:
  - 1) Ember-resistant vents
  - 2) Fire-resistant roofs
  - 3) Surrounding defensible space
  - 4) Proper maintenance and upkeep of structures and surrounding area

## B.5.10 HYDROLOGY AND WATER QUALITY

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**Impact HYD-1** Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

### FINDING

SCAG finds that the Plan's impact related to the potential to degrade surface or groundwater quality remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the

implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HYD-1 and PMM-HYD-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. Mitigation Measure SMM-HYD-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-HYD-1 would reduce adverse impacts related to the potential to substantially degrade surface or groundwater quality.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the potential to substantially degrade surface or groundwater quality, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

**SMM-HYD-1** SCAG shall continue to facilitate regional forums for collaboration opportunities, such as through the Sustainable & Resilient Communities Working Group, to share best practices and develop recommendations to create resilient communities in the region. SCAG shall continue to work with stakeholders and the public to encourage regional-scale planning that addresses regional shocks and stressors, such as improved water quality, groundwater, stormwater management, pollution prevention, flooding, wildfire prevention, disaster emergency services, emergency evacuation plans, wildfire resiliency, and earthquake preparedness to the extent practical and feasible through cooperative planning, information sharing, and encouragement of comprehensive control measure development within the SCAG region.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-HYD-1** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. While compliance with the various municipal regional stormwater permits (MS4s) is required by law, not all areas are necessarily covered under a permit. For those areas that are not covered under a municipal stormwater permit (MS4), such measures may include the following or other comparable measures identified by the lead agency:

- a) Implement best management practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
- b) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.



- c) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
- d) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
- e) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban stormwater runoff discharge permits, on new facilities.
- f) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable stormwater runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
- g) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
- h) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.
- i) Encourage low-impact development and incorporation of natural spaces that reduce, treat, infiltrate, and manage stormwater runoff flows in all new developments, where practical and feasible.

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**Impact HYD-2**     **Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.**

## FINDING

SCAG finds that the Plan's impact related to substantially decreasing groundwater supplies or interfere substantially with groundwater recharge such that the Plan may impede sustainable groundwater management of the basin remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-HYD-1** and **PMM-HYD-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. would be significant. Mitigation Measure SMM-HYD-1 would reduce project impacts to the maximum extent

feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-HYD-2 would reduce adverse related to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Plan may impede sustainable groundwater management of the basin.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Plan may impede sustainable groundwater management of the basin, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

- PMM-HYD-2** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project. Construction designs comply with appropriate building codes and standard practices including the CBC.
  - b) Maximize, where practical and feasible, permeable surface area to protect water quality and allow for groundwater recharge. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
  - c) Avoid construction and siting on groundwater recharge areas, where feasible, to prevent conversion of those areas to impervious surface.

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**Impact HYD-3A** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.

## FINDING

SCAG finds that the Plan's impact related to substantially altering the existing drainage pattern of the site or area remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HYD-1 and PMM-HYD-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. Mitigation Measure SMM-HYD-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-HYD-1 would reduce adverse impacts related to substantially altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on- or off-site.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to erosion or siltation on- or off-site, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HYD-1.

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**Impact HYD-3B** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of flooding on- or off-site.

## FINDING

SCAG finds that the Plan's impact related to substantially altering the existing drainage pattern of the site or area in a manner which would substantially increase the rate or amount of flooding on- or off-site remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-HYD-1**, **PMM-HYD-1**, and **PMM-HYD-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. Mitigation Measure **SMM-HYD-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG, Project-Level Mitigation Measures **PMM-HYD-1** and **PMM-HYD-2** would reduce adverse impacts related to flooding on site or off site.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to substantial flooding on- or off-site, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-HYD-1**.

### PROJECT-LEVEL MITIGATION MEASURES

See **PMM-HYD-1** and **PMM-HYD-2**.

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**Impact HYD-3C** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

## FINDING

SCAG finds that the Plan's impact related to substantially altering the existing drainage pattern of the site or area, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-HYD-1**, **PMM-HYD-1**, and **PMM-HYD-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. Mitigation Measure SMM-HYD-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-HYD-1 and PMM-HYD-2 would reduce adverse impacts related to substantially altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the potential to exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HYD-1 and PMM-HYD-2.

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**Impact HYD-3D** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

## FINDING

SCAG finds that the Plan's impact related to substantially altering the existing drainage pattern of the site or area, in a manner which would impede or redirect flood flows remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HYD-1, PMM-HYD-1, and PMM-HYD-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. Mitigation Measure SMM-HYD-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-HYD-1 and PMM-HYD-2 would reduce adverse impacts related to substantially altering the existing drainage pattern of the site or area, in a manner which would impede or redirect flood flows.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse effect related to impeding or redirecting flood flows, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HYD-1 and PMM-HYD-2.

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**Impact HYD-4** In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

## FINDING

SCAG finds that the Plan's impact related to the risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HYD-1 and PMM-HYD-4.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. Mitigation Measure SMM-HYD-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-HYD-4 would reduce adverse impacts related to risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-HYD-3** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. In areas affected by coastal flooding, new projects should be designed for resilience against 3.5 feet of sea-level rise, as per California Ocean Protection Council's strategic guidance. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

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**Impact HYD-5** Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

## FINDING

SCAG finds that the Plan's impact related to the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HYD-1 and PMM-HYD-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.10, *Hydrology and Water Quality*. Mitigation Measure SMM-HYD-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-HYD-2 would reduce adverse impacts related to the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan would be significant

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HYD-2.

## B.5.11 LAND USE AND PLANNING

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Impact LU-1      Potential to physically divide an established community.

### FINDING

SCAG finds that the Plan's impact related to the potential to physically divide an established community remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-LU-1 and PMM-LU-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.11, *Land Use and Planning*. Mitigation Measure SMM-LU-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-LU-1 would reduce adverse impacts related to physically dividing an established community.



At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the potential to physically divide an established community, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

**SMM-LU-1** SCAG shall continue to coordinate with local County Transportation Commissions, Caltrans, and other local jurisdictions when siting new facilities in residential areas to facilitate minimizing future impacts on established communities through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts to promote best planning practices.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-LU-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Facilitate connections in communities that have been physically divided through land use projects that build upon and improve existing circulation patterns.
- b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:
  - Selecting alignments within or adjacent to existing public rights of way.
  - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
  - Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
- c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
  - Alignment shifts to minimize the area affected.
  - Reduction of the proposed right-of-way take to minimize the overall area of impact.
  - Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

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**Impact LU-2** Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

## FINDING

SCAG finds that the Plan's impact related to conflicts with any land use plan, policy, or regulation remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-LU-2, SMM-LU-3, and PMM-LU-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.11, *Land Use and Planning*. Mitigation Measures SMM-LU-2 and SMM-LU-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-LU-2 would reduce adverse impacts related to conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce potential impacts related to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

**SMM-LU-2** SCAG shall continue to use the Intergovernmental Review (IGR) Program as an information sharing tool by providing information to regionally significant projects as defined in CEQA Guidelines Section 15206 to facilitate consideration of the most currently adopted Connect SoCal 2024. SCAG shall continue to review regionally significant projects submitted to SCAG to include them in the IGR Bi-Monthly Reports that are published on SCAG's IGR Program website at: <https://scag.ca.gov/igr-bi-monthly-report>. For more information on SCAG's IGR Program, please visit: <http://www.scag.ca.gov/programs/Pages/IGR.aspx>.

**SMM-LU-3** SCAG shall continue to support local jurisdictions when they update their general plans at least every ten years, as recommended by the Governor's Office of Planning and Research through the use of the multiple planning and analytical tools provided by SCAG such as the Regional Data Platform and other GIS software. Additionally, SCAG shall continue to facilitate information sharing, such as through the Toolbox Tuesday program to provide webinars on technical information and tools that may be useful for local jurisdictions to assist with their general plan

updates, and funding programs, such as Regional Early Action Planning grants and Call for Projects.

## PROJECT-LEVEL MITIGATION MEASURES

**PMM-LU-2** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that are due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as applicable and feasible. When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified, measures may include the following or other comparable measures identified by the lead agency:

- a) Modify the transportation or land use project to eliminate or reduce the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation and process said amendment.

## B.5.12 MINERAL RESOURCES

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**Impact MIN-1** Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

### FINDING

SCAG finds that the Plan's impact related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-MIN-1**.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.12, *Mineral Resources*. Mitigation Measure **SMM-GEN-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-MIN-1** would reduce adverse impacts related to the loss of availability of a known mineral resource.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-MIN-1** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
- b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:
  - 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
  - 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
  - 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.
  - 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

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**Impact MIN-2** Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

## FINDING

SCAG finds that the Plan's impact related to the loss of availability of a locally important mineral resource recovery site remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and

with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-MIN-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.12, *Mineral Resources*. Mitigation Measure **SMM-GEN-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-MIN-1** would reduce adverse impacts relate to the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-GEN-1**.

### PROJECT-LEVEL MITIGATION MEASURES

See **PMM-MIN-1**.

## B.5.13 NOISE

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**Impact NOI-1**      **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.**

## FINDING

SCAG finds that the Plan's impact related to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-LU-1** through **SMM-LU-3**, **SMM-POP-1**, **SMM-POP-2**, and **PMM-NOI-1**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.13, *Noise*. Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-NOI-1 would reduce adverse impacts related to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

### PROJECT-LEVEL MITIGATION MEASURES

- PMM-NOI-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce ambient noise levels in the vicinity of the project, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a. Install temporary noise barriers during construction between noise sources and noise-sensitive land uses and species.
  - b. Include permanent noise barriers and sound-attenuating features as part of the project design between noise sources and noise-sensitive land uses and species. Barriers could be in the form of outdoor barriers, sound walls, buildings, landscaped berms, dense planting, or earth berms to attenuate noise at adjacent sensitive uses. Sound-attenuating features could be in the form of grade separation, buffer zones, reduced-noise paving materials, and traffic calming measures.
  - c. Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance
  - d. Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

- e. Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- f. Designate an on-site construction complaint and enforcement manager for the project.
- g. Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- h. Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- i. Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- j. Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- k. Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned
- l. Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.
- m. Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.
- n. Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- o. Stationary noise sources can and should be located as far from adjacent sensitive receptors and species to the maximum extent feasible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- p. Use of portable barriers in the vicinity of sensitive receptors during construction.

- q. Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.
- r. Monitor the effectiveness of noise attenuation measures by taking noise measurements.
- s. Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.

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## Impact NOI-2      Generation of excessive groundborne vibration or groundborne noise levels.

### FINDING

SCAG finds that the Plan's impact related to the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, PMM-NOI-1, and PMM-NOI-2.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.13, *Noise*. Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-NOI-1 and PMM-NOI-2 would reduce adverse impacts related to the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce the potential to result in the generation of excessive groundborne vibration or groundborne noise levels, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

### MITIGATION MEASURES

#### SCAG MITIGATION MEASURES

See SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

#### PROJECT-LEVEL MITIGATION MEASURES

See PMM-NOI-1.

**PMM-NOI-2**      In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial



adverse effects related to groundborne vibration. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
- b. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
- c. For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain and reduce the vibration occurrences and magnitude.
- d. Perform construction activities within permitted hours in accordance with local jurisdiction regulation.
- e. Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).

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**Impact NOI-3** For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

## FINDING

SCAG finds that the Plan's impact related to exposing people to excessive aviation-related noise remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HAZ-2 and PMM-NOI-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.13, *Noise*. The potential to result in the exposure of persons to public airport or public use airport noise levels would be significant. Implementation of Mitigation Measure SMM-HAZ-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-NOI-1 would reduce adverse impacts related to exposing people to excessive aviation-related noise.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as appropriate and feasible. While compliance with all applicable laws and regulations and

implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts that expose people to public airport or public use airport noise levels, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HAZ-2.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-NOI-1.

## B.5.14 POPULATION AND HOUSING

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**Impact POP-1** Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

### FINDING

SCAG finds that the Plan's impact related to the potential to induce substantial unplanned population growth remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-LU-3, SMM-TRA-1, SMM-TRA-2, SMM-POP-1, and SMM-POP-2.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.14, *Population and Housing*. Mitigation Measures SMM-GEN-1, SMM-LU-3, SMM-TRA-1, and SMM-TRA-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures SMM-POP-1 and SMM-POP-2 would reduce adverse impacts related to substantial unplanned population growth.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to induced substantial unplanned population growth in an area, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-LU-3, SMM-TRA-1, and SMM-TRA-2.

**SMM-POP-1** SCAG shall continue to facilitate collaboration forums, such as through SCAG's Housing Working Group, and host public outreach events in various formats that respond to issues that shape the housing crisis and share information on sustainable housing development and potential funding opportunities.

**SMM-POP-2** SCAG shall continue to produce a variety of demographic, economic, education, housing, public health, and transportation information to facilitate data exchange for local jurisdictions across the region, through existing web-based planning tools, such as [SCAG Regional Data Platform \(RDP\)](#). Local jurisdictions may utilize these tools for a variety of planning and community outreach purposes including project and program planning and grant development.

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**Impact POP-2** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

## FINDING

SCAG finds that the Plan's impact related to displacing substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-POP-1 through SMM-POP-2, and PMM-POP-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.14, *Population and Housing*. Mitigation Measures SMM-GEN-1, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-POP-1 would reduce adverse impacts related to displacing substantial amounts of existing housing.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce adverse effects related to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG LEVEL MITIGATION MEASURES

See SMM-GEN-1 and SMM-POP-1 through SMM-POP-2.

### PROJECT-LEVEL MITIGATION MEASURES

- PMM-POP-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
  - Prioritize the use of existing ROWs, wherever feasible.
  - Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between ROW acquisition and construction.
  - Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead agency and encouraged by the SCS (primarily TPAs, where applicable).
  - When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.

## B.5.15 PUBLIC SERVICES

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**Impact PS-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.

## FINDING

SCAG finds that the Plan's impact related to an increase in the use of fire protection services such that a need for new or physically altered fire protection facilities remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-HYD-1, SMM-WF-1, SMM-WF-2, PMM-PSP-1, PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.15. *Public Services*. Mitigation Measures SMM-GEN-1, SMM-HYD-1, SMM-WF-1, and SMM-WF-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-PSP-1, PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2 would reduce adverse impacts related to an increase in the use of fire protection services such that a need for new or physically altered fire protection facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce adverse effects related to increased demand for fire protection, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-HYD-1, SMM-WF-1, and SMM-WF-2.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

- PMM-PSP-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered fire and police facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Coordinate with fire and police protection services agencies to ensure that there are adequate facilities to maintain acceptable service ratios, response times or other performance objectives for fire and police protection services and that any required additional construction of buildings is incorporated into the project description.
  - b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements for fire and police protection services facilities, as appropriate and applicable, to mitigate identified CEQA impacts.

**Impact PS-2** Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.

## FINDING

SCAG finds that the Plan's impact related to the increase in need for police protection services such that the need for new or physically altered police protection facilities remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-PS-1, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.15, *Public Services*. Mitigation Measures SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-PS-1, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2 would reduce adverse impacts related to the increase in need for police protection services such that the need for new or physically altered police protection facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as appropriate and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce adverse effects related to the potential increased demand for police protection services, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-PS-1, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

**Impact PS-3** Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.

## FINDING

SCAG finds that the Plan's impact related to the increase in use of schools such that the need for new or physically altered schools facilities remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, PMM-PS-2, PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.15, *Public Services*. Mitigation Measures SMM-GEN-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-pop-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-PS-2, PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2 would reduce adverse impacts related to the increase in use of schools such that the need for new or physically altered schools facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

## PROJECT-LEVEL MITIGATION MEASURES

See PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

**PMM-PS-2** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- Where construction or expansion of school facilities is required to meet public school service ratios, support expansion of such facilities, for example by ensuring safe routes to schools.

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**Impact PS-4** Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.

## FINDING

SCAG finds that the Plan's impact related to the increase in use of libraries such that the need for new or physically altered library facilities would become necessary remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2, PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.15, *Public Services*. Mitigation Measures SMM-GEN-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2 would reduce adverse impacts related to the increase in use of libraries such that the need for new or physically altered library facilities would become necessary.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as appropriate and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce the adverse physical impacts associated with the provision of new or physically altered library



facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

SMM-GEN-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-AES-1, PMM-AQ-1, PMM-AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

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Impact PS-5	Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives.
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## FINDING

SCAG finds that the Plan's impact related to recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, SMM-REC-1, PMM-REC-1, PMM-AQ-2, and PMM-NOI-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.16, *Recreation*. Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures SMM-REC-1, PMM-REC-1, PMM-AQ-2, and PMM-NOI-1 would reduce adverse impacts related to recreational facilities or require the construction or expansion of recreational facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects related to recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, due to the regional nature

of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, and SMM-REC-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-REC-1, PMM-AQ-2, and PMM-NOI-1.

## B.5.16 PARKS AND RECREATION

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**Impact REC-1**      **Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.**

### FINDING

SCAG finds that the Plan's impact related to the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-REC-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, and PMM-REC-1.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.16, *Recreation*. Mitigation Measures SMM-REC-1, SMM-LU-1 through SMM-LU-3, and SMM-POP-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures SMM-POP-2 and PMM-REC-1 would reduce adverse impacts related to the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects related to increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

**SMM-REC-1** SCAG shall continue to encourage and recommend approaches to help local jurisdictions improve residential access to, and use of, existing neighborhood and regional parks through information sharing and regional forums for collaboration, such as the Equity Working Group.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-REC-1** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
- b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
  - i. Increasing the accessibility to natural areas for outdoor recreation
  - ii. Utilizing "green" development techniques
  - iii. Promoting water-efficient land use and development
  - iv. Encouraging multiple uses, such as the joint use of schools
  - v. Including trail systems and trail segments in General Plan recreation standards

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**Impact REC-2** **Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

## FINDING

SCAG finds that the Plan's impact related to the construction or expansion of recreational facilities which might have an adverse physical effect on the environment remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, SMM-REC-1, PMM-REC-1, PMM-AQ-2, and PMM-NOI-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.16, *Recreation*. Mitigation Measures SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures SMM-REC-1, PMM-REC-1, PMM-AQ-2, and PMM-NOI-1 would reduce adverse impacts related to the construction or expansion of recreational facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects related to the potential to include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, and SMM-REC-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-REC-1, PMM-AQ-2, and PMM-NOI-1.

## B.5.17 TRANSPORTATION

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Impact TRA-1      Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

## FINDING

SCAG finds that the Plan's impact related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-LU-3, SMM-POP-2, and PMM-TRA-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.17, *Transportation*. Mitigation Measures SMM-LU-3 and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-TRA-1 would reduce adverse impacts related to conflicts with a

program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-LU-3 and SMM-POP-2.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-TRA-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:

- For future land use development projects, lead agencies to encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services in project designs, as well as encourage developers to provide information regarding the availability of these facilities and services to residents, tenants, and owners in order to facilitate increased access to and utilization of transit and active transportation services and facilities.

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**Impact TRA-2** Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

## FINDING

Implementation of Mitigation Measures **SMM-POP-2**, **SMM-TRA-1** through **SMM-TRA-3**, and **PMM-TRA-2** would reduce impacts. While the mitigation measures would reduce the impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the Plan's impact related to the potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) (which sets forth the criteria for analyzing transportation impacts) remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-POP-2**, **SMM-TRA-1** through **SMM-TRA3**, and **PMM-TRA-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.17, *Transportation*. Mitigation Measures SMM-POP-2 and SMM-TRA-1 through SMM-TRA-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-TRA-2 would reduce adverse impacts related to the potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce the potential to conflict with CEQA Guidelines Section 15064.3(b), due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-POP-2.

- SMM-TRA-1** SCAG shall facilitate the reduction of vehicle miles traveled (VMT) and impacts to circulation and access through mobility improvements and by encouraging transit/rail and active transportation use via stakeholder forums (e.g., quarterly Safe and Active Streets Working Group meetings, bimonthly Regional Transit Technical Advisory Committee meetings, monthly Active Transportation Program check-ins with County Transportation Commissions). These objectives will also be facilitated through the hosting of regional forums for policy makers, County Transportation Commissions, planning agencies, local jurisdictions, and state partners to promote information sharing.
- SMM-TRA-2** SCAG shall continue to support development of local and regional SB 743 implementation programs.
- SMM-TRA-3** SCAG shall continue to develop and support its program for reducing average daily number of SCAG employees' commute vehicle trips.

### PROJECT-LEVEL MITIGATION MEASURES

- PMM-TRA-2** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:
- Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local jurisdictions should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the

following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:

- Include TDM mitigation requirements for new developments;
- Incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;
- Provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
- Implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
- Develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
- Incorporate TDM performance measures in the decision-making process for identifying transportation investments;
- Implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
- Set aside funding for TDM initiatives.

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**Impact TRA-3**      **Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

## FINDING

SCAG finds that the Plan's impact related to the substantially increased hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-GEN-1** and **PMM-TRA-3**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.17, *Transportation*. Mitigation Measure **SMM-GEN-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure **PMM-TRA-3** would reduce adverse impacts related to the substantially increased hazards due to geometric design feature.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce conflicts with CEQA Guidelines Section 15064.3(b), due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-TRA-3** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:

Lead agencies can and should prepare a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction's applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).

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**Impact TRA-4** Result in inadequate emergency access.

## FINDING

SCAG finds that the Plan's impact related to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, SMM-TRA-1, PMM-HAZ-1 through PMM-HAZ-3, and PMM-HAZ-4.**

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*, under Impact HAZ-6. Mitigation Measures SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, and SMM-TRA-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-HAZ-1 through PMM-HAZ-3 and PMM-HAZ-4 would reduce adverse impacts related to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and the mitigation measures would reduce adverse impacts related to the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.



## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, and SMM-TRA-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HAZ-1 through PMM-HAZ-3.

**PMM-HAZ-4** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.
- Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.
- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
  - Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
  - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
  - Scheduling of truck trips outside of peak morning and evening commute hours.
  - Limiting of lane closures during peak hours to the maximum extent feasible.
  - Usage of designated haul routes to minimize truck traffic on local roadways to the maximum extent feasible.
  - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
  - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
  - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be

developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.

- Storage of construction materials only in designated areas.
- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.

## B.5.18 TRIBAL CULTURAL RESOURCES

Impact TRC-1	<p>Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <ul style="list-style-type: none"> <li>• Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</li> <li>• A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c). In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</li> </ul>
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### FINDING

SCAG finds that the Plan's impact related to a substantial adverse change in the significance of a tribal cultural resources remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-CUL-1, PMM-CUL-1, and PMM-TCR-1.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.18, *Tribal Cultural Resources*. Mitigation Measure SMM-CUL-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-CUL-1 and PMM-TCR-1 would reduce adverse changes in the significance of a tribal cultural resource.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse effects to a tribal cultural resource, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-CUL-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-CUL-1.

**PMM-TCR-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Avoid and/or preserve the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria
- b) Treat the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;
- c) Provide permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.
- d) If tribal cultural resources are found, then the lead agency should consider tribal construction monitoring.

## B.5.19 UTILITIES AND SERVICE SYSTEMS

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**Impact UTIL-1** Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

### FINDING

SCAG finds that the Plan's impact related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HYD-1, PMM-HYD-1, and PMM-UTIL-1.

### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.19, *Utilities*. Mitigation Measure SMM-CUL-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-CUL-1 and PMM-TCR-1 would reduce adverse impacts related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities;

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

### MITIGATION MEASURES

#### SCAG MITIGATION MEASURES

See SMM-HYD-1.

#### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HYD-1.

**PMM-UTIL-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater

facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.

- During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. The proposed development can and should be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.

**PMM-UTIL-2** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Reduce exterior consumptive uses of water in public areas, and promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.
- b) Promote the availability of drought-resistant landscaping options and provide information on how these can be obtained. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
- d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

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**Impact UTIL-2** Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

## FINDING

SCAG finds that the Plan's impact related to wastewater treatment capacity and associated facilities remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-HYD-1, PMM-HYD-1, and PMM-UTIL-1.**

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.19, *Utilities*. Mitigation Measure SMM-CUL-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-CUL-1 and PMM-TCR-1 would reduce adverse impacts related to wastewater treatment capacity and associated facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as appropriate and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce adverse impacts related to wastewater treatment capacity, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-UTIL-1.

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**Impact UTIL-3     Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.**

## FINDING

SCAG finds that the Plan's impact related to the construction of new storm water drainage facilities or expansion of existing facilities remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-USSWS-1, SMM-HYD-1, and PMM-UTIL-2.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.19, *Utilities*. Mitigation Measures SMM-USSWS-1 and SMM-HYD-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-UTIL-2 would reduce adverse impacts related to the construction of new storm water drainage facilities or expansion of existing facilities.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the construction of new storm water drainage facilities or expansion of existing

facilities, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-USSWS-1 and SMM-HYD-1.

### PROJECT-LEVEL MITIGATION MEASURES

See PMM-UTIL-2.

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Impact UTIL-4      **Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.**

## FINDING

SCAG finds that the Plan's impact related to the generation solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-USSW-1 and PMM-UTIL-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.19, *Utilities*. Mitigation Measure SMM-USSW-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-UTIL-1 would reduce adverse impacts related to the generation solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as appropriate and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the generation solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

**SMM-USSW-1** SCAG shall continue to provide support for coordinating with waste management agencies, and appropriate local and regional jurisdictions, and sharing information to facilitate and encourage diversion of solid waste where applicable, appropriate, and feasible.

### PROJECT-LEVEL MITIGATION MEASURES

**PMM-UTIL-3** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:

- a) Reuse and minimize construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
- b) Include a waste management plan that promotes maximum C&D diversion.
- c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- d) Reuse existing structure and shell in renovation projects.
- e) Develop indoor recycling program and space.
- f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and where appropriate and feasible.
- h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent state waste diversion target.
- i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction, and recycling practices.
- j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled



content procurement programs; and developing additional opportunities to divert food waste away from landfills and toward food banks and composting facilities.

- k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- l) Integrate reuse and recycling into residential industrial, institutional, and commercial projects.
- m) Provide education and publicity about reducing waste and available recycling services.
- n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

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**Impact UTIL-5    Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.**

## FINDING

SCAG finds that the Plan's impact related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-USWS-1** and **PMM-UTIL-3**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.19, *Utilities*. Failure to comply with federal, state, and local management and reduction statutes and regulations related to solid waste would be significant. Implementation of Mitigation Measure SMM-USWS-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measure PMM-UTIL-3 would reduce adverse impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as appropriate and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-USSW-1.

## PROJECT-LEVEL MITIGATION MEASURES

See PMM-UTIL-3.

### B.5.20 WILDFIRE

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**Impact WF-1** Substantially impair an adopted emergency response plan or emergency evacuation plan.

#### FINDING

SCAG finds that the Plan's impact related to implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, SMM-TRA-1, PMM-HAZ-1 through PMM-HAZ-3, and PMM-HAZ-4.

#### RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.9, *Hazards and Hazardous Materials*, under Impact HAZ-6. Mitigation Measures SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, and SMM-TRA-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-HAZ-1 through PMM-HAZ-3 and PMM-HAZ-4 would reduce adverse impacts related to implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

#### MITIGATION MEASURES

##### SCAG MITIGATION MEASURES

See SMM-HAZ-1, SMM-HAZ-2, SMM-WF-1, and SMM-TRA-1.

##### PROJECT-LEVEL MITIGATION MEASURES

See PMM-HAZ-1 through PMM-HAZ-3.

**PMM-HAZ-4** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial

adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.
- Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.
- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
  - Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
  - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
  - Scheduling of truck trips outside of peak morning and evening commute hours.
  - Limiting of lane closures during peak hours to the maximum extent feasible.
  - Usage of designated haul routes to minimize truck traffic on local roadways to the maximum extent feasible.
  - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
  - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
  - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
  - Storage of construction materials only in designated areas.
  - Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
  - Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure

needs necessary for (a) emergency responders to enter the region, (b) evacuation of affected facilities, and (c) restoration of utilities.

- Enhance emergency preparedness awareness among public agencies and with the public at large.

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**Impact WF-2** Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

## FINDING

SCAG finds that the Plan's impact related to the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures SMM-GEN-1, SMM-WF-1, SMM-HAZ-1, SMM-HAZ-2, SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, SMM-POP-2, PMM-HAZ-5, and PMM-WF-1.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.20, *Wildfire*. Mitigation Measures SMM-GEN-1, SMM-WF-1, SMM-HAZ-1, SMM-HAZ-2, SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-HAZ-5 and PMM-WF-1 would reduce adverse impacts related to exposing people or structures to a significant risk of loss, injury or death involving wildland fires.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-HAZ-1, SMM-HAZ-2, SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

**SMM-WF-1** SCAG shall continue to provide a regional forum for collaboration in planning, communication, and information sharing on best practices around wildfire resilience.

## PROJECT-LEVEL MITIGATION MEASURES

See PMM-HAZ-5.

- PMM-WF-1** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.
  - b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
  - c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.
  - d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.
  - e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
  - f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.
  - g) Include external sprinklers with an independent water source to reduce flammability of structures.
  - h) Include local solar power paired with batteries to reduce power flow in electricity lines.
  - i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.
  - j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.
  - k) Developments in fire-prone areas should have fire-resistant features, such as:
    - 1) Ember-resistant vents
    - 2) Fire-resistant roofs
    - 3) Surrounding defensible space
    - 4) Proper maintenance and upkeep of structures and surrounding area
  - l) Explore and implement new strategies and better roadway easement management to minimize fire ignitions along roadways.
  - m) Coordinate with CAL FIRE, local Fire Safe Councils, and homeowners' associations to implement FireWise Communities, implement restoration projects that remove highly

flammable non-native grasses, and improve habitat via restoration projects at the Wildland Urban Interface.

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**Impact WF-3**      **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.**

## FINDING

SCAG finds that the Plan's impact related to infrastructure that may exacerbate fire risks remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-WF-1**, **PMM-HAZ-4**, and **PMM-WF-2**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.20, *Wildfire*. Mitigation Measure SMM-WF-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures PMM-HAZ-4 and PMM-WF-2 would reduce adverse impacts related to infrastructure that may exacerbate fire risks.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to infrastructure that may exacerbate fire risks, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-WF-1**.

### PROJECT-LEVEL MITIGATION MEASURES

See **PMM-HAZ-4**.

**PMM-WF-2**      In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) New development or infrastructure activity within very high hazard severity zones or SRAs to:
  - 1) Submit a fire protection plan including the designation of fire watch staff;

- 2) Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;
- 3) Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and
- 4) Designate trained fire watch staff during project construction to reduce risk of fire hazards.

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**Impact WF-4**      **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.**

## FINDING

SCAG finds that the Plan's impact related to the exposure of people or structures to risks resulting from runoff, post-fire slope stability, or drainage changes remains **significant and unavoidable** even assuming compliance with all applicable laws and regulations and with the implementation of applicable Regional Planning Policies, Implementation Strategies, and Mitigation Measures **SMM-LU-1** through **SMM-LU-3**, **SMM-WF-1**, **SMM-HYD-1**, **SMM-GEO-2**, **PMM-WF-1**, **PMM-WF-2**, **PMM-HYD-1**, and **PMM-HAZ-4**.

## RATIONALE

The above finding is made based on the analysis included in PEIR Section 3.20, *Wildfire*. Mitigation Measures **SMM-LU-1** through **SMM-LU-3**, **SMM-WF-1**, **SMM-HYD-1**, and **SMM-GEO-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. Project-Level Mitigation Measures **PMM-WF-1**, **PMM-WF-2**, **PMM-HYD-1**, and **PMM-HAZ-4** would reduce adverse impacts related to the exposure of people or structures to risks resulting from runoff, post-fire slope stability, or drainage changes.

At the project-level, lead agencies can and should consider the identified project-level mitigation measures or other comparable measures identified by the lead agency during subsequent review of transportation and land use projects as applicable and feasible. While compliance with all applicable laws and regulations and implementation of applicable Regional Planning Policies, Implementation Strategies, and mitigation measures would reduce impacts related to the exposure of people or structures to risks resulting from runoff, post-fire slope stability, or drainage changes, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact remains **significant and unavoidable**.

## MITIGATION MEASURES

### SCAG MITIGATION MEASURES

See **SMM-LU-1** through **SMM-LU-3**, **SMM-WF-1**, and **SMM-HYD-1**.

### PROJECT-LEVEL MITIGATION MEASURES

See **PMM-WF-1**, **PMM-WF-2**, **PMM-HYD-1**, and **PMM-HAZ-4**.

## **B.5.21 FINDINGS ON CUMULATIVE IMPACTS**

In compliance with CEQA Guidelines Section 15130, the 2024 PEIR evaluates the cumulative impacts of Connect SoCal 2024. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355). Thus, if the effects of the Plan, in combination with the effects of past, present, and reasonably foreseeable future related projects within the region would be significant, the Plan’s incremental effects must be analyzed to determine if the Plan’s contribution to the cumulative impact is cumulatively considerable (CEQA Guidelines Section 15065(a)(3)). Supportive evidence for the below findings may be found in the “Cumulative Impacts” sections of each resource topic analysis in Draft PEIR Chapter 3.

### **CUMULATIVE EFFECTS FOR WHICH THE CONTRIBUTION OF THE PLAN WOULD BE CUMULATIVELY CONSIDERABLE EVEN WITH IMPLEMENTATION OF MITIGATION MEASURES**

Based on the analysis set forth in the 2024 PEIR, SCAG finds that the cumulative impacts of the Plan, in combination with the effects of past, present, and reasonably foreseeable future related projects within the region, would be significant. SCAG further finds that the Plan’s contribution to significant cumulative impacts would remain cumulatively considerable even with implementation of the mitigation measures set forth in the 2024 PEIR, and thus would be significant and unavoidable.

Connect SoCal 2024 is a regional-scale Plan comprised of policies and strategies, a regional growth forecast and land use pattern, and individual projects and investments. At this regional-scale, a cumulative or related project to the Plan is another regional-scale plan (such as Air Quality Management Plans within the region) and similar regional plans for adjacent regions. Because the Plan, in and of itself, would result in significant adverse environmental impacts, these impacts would add to the environmental impacts of other cumulative or related projects. Mitigation measures that reduce the Plan’s impacts would similarly reduce the Plan’s contribution to cumulative impacts. However, such cumulative impacts (with three exceptions as discussed below) would be significant and the Plan’s contribution to such impacts would be considerable.

### **CUMULATIVE IMPACTS FOR WHICH THE CONTRIBUTION OF THE PLAN WOULD NOT BE CUMULATIVELY CONSIDERABLE**

As discussed in Section B.4, above, the analysis undertaken in support of the 2024 PEIR concludes that the Plan would have no impact or less-than-significant impacts in the following environmental resource categories and that no mitigation would be required:

- 3.2 Agriculture and Forestry Resources (AG-3 – Timberland and Timberland Production Zones)
- 3.3 Air Quality (AQ-1 – Plan Consistency with Federal Transportation Conformity Requirements)
- 3.8 Greenhouse Gas Emissions (GHG-2 – Plan Consistency with Senate Bill 375)

As noted above, each of these impacts were not separately identified but rather as components of larger categories of impacts: Impact AG-3 also includes forest land (which was found to be significantly impacted by the Plan); Impact AQ-1 addresses all air quality plans in the region and considers both regional and project-level impacts, only regional transportation conformity was found to be less than significant); Impact GHG-2 addresses all plans



applicable to the region that are aimed at reducing GHG emissions and addresses both regional and project level impacts, only Plan's consistency with SB 375 was found to be less than significant).

The Plan would result in no impacts with respect to zoning for timberland and Timberland Production zones and would not contribute to any statewide impact, and therefore, the impact would not be cumulatively considerable. With respect to Plan consistency with federal transportation conformity requirements, and Plan consistency with SB 375 requirements for RTP/SCS, the analyses consider Plan impacts as they relate to these regulatory requirements. In accordance with the guidelines of the regulations, the analyses include emissions that are at least partially attributable to other planning areas – i.e., vehicles starting and/or ending their trip outside the region. The issue of Plan consistency is focused on just the SCAG region and its regional Plan and does not consider the consistency of other regions and therefore the issue of regional consistency with these regulations is not cumulatively considerable. The issue of the contribution to cumulative *emissions* with respect to federal transportation conformity and SB 375 requirements is addressed as part of the overall analyses of impacts to air quality and greenhouse gas emissions in Impacts AQ-1 and GHG-2, respectively. While the Plan would be consistent with federal conformity requirements and SB 375, the overall finding for impacts related to air quality and greenhouse gas plans including consideration of project-level emissions (Impacts AQ-1 and GHG-2) is that the Plan would result in significant impacts that would contribute to impacts of cumulative projects.

## B.6 FINDINGS REGARDING ALTERNATIVES

### B.6.1 BACKGROUND

CEQA requires that an EIR describe a reasonable range of alternatives to the project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the comparative merits of the alternatives. PEIR Chapter 4, *Alternatives*, sets forth potential alternatives to the proposed project and provides a qualitative analysis of each alternative and a comparison of each alternative to the proposed project. Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.

The discussion of alternatives shall focus on alternatives to the project including alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would reasonably be 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.

The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project.

For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

An EIR need not consider an alternative whose effects can be reasonably ascertained and whose implementation is remote and speculative.

## **B.6.2 PROJECT OBJECTIVES AND LEGAL REQUIREMENTS**

At the time of project approval, the lead agency's decision-making body must determine whether the alternatives are feasible or not—a task it cannot delegate (see *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998–1000; and CEQA Guidelines Sections 15025(b)(2), 15091(a)(3)). The lead agency must consider whether specific “economic, legal, social, technological, and other considerations ... make infeasible mitigation measures or alternatives identified in the environmental impact report” (PRC Section 21081(a)(3); CEQA Guidelines Section 15091(a)(3)).

“Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors” (CEQA Guidelines Section 15364; see also CEQA Guidelines Section 15021(b)). The concept of “feasibility” under CEQA also encompasses “desirability” to the extent that desirability is based on a reasonable balancing of all relevant factors (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417). Additionally, “policy considerations,” may also be taken into account because they are “permissible” under CEQA as “other considerations” that make infeasible mitigation measures or alternatives identified in the EIR (see *California Native Plant Society* 177 Cal.App.4th at 1001 [An agency may reject project alternatives if found to be impracticable or undesirable from a policy standpoint.]) Finally, an alternative or measure is legally infeasible if “there is no way to legally implement it” (*Sequoyah Hills Homeowners Assn. v. City of Oakland*, 23 Cal.App.4th 704, 714 (1993)).

Importantly, CEQA gives lead agencies the authority to approve a project notwithstanding its significant environmental impacts, if the agency determines it is not “feasible” to lessen or avoid the significant effects (PRC Section 21002). If specifically identified benefits of the project outweigh the significant unavoidable environmental impacts, the adverse impacts may be considered “acceptable,” thereby allowing for lead agency approval of the project, notwithstanding such adverse impacts, provided the agency adopts a statement of overriding considerations (PRC Section 21081.1(b); CEQA Guidelines Section 15093).

As called for by the CEQA Guidelines, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. The goals and subgoals for Connect SoCal 2024 are presented in Section B.2.1, *Plan Vision and Goals*, above.

CEQA does not require adoption of an alternative that does not adequately meet project objectives as determined by the lead agency decision-makers. A feasible alternative must meet most, if not all, of these project objectives. In addition, while not specifically required under CEQA, other parameters may be used to further establish criteria for selecting alternatives such as adjustments to phasing, and other “fine-tuning” that could shape feasible alternatives in a manner that could result in reducing identified environmental impacts.

The SCAG Regional Council finds that the Plan meets all of the above objectives and is feasible. With the exception of the No Project Alternative, the other alternative considered herein meet some but not all of these objectives. SCAG has evaluated two alternatives: (1) No Project Alternative and (2) the Intensified Land Use Alternative and determined that none of the alternatives were able to avoid the significant impacts associated with the Plan. The SCAG Regional Council further finds that the other alternatives are infeasible due to economic, legal, social, technological, and other considerations including policy considerations as discussed in more detail below.

## OVERVIEW

Alternatives for Connect SoCal 2024 were analyzed in the 2024 PEIR consistent with the recommendations of CEQA Guidelines Section 15126.6, which require evaluation of a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant project effects. CEQA indicates that the range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. As a result, potential alternatives must be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that SCAG determines could feasibly attain most of the basic objectives of the Plan as discussed in Chapter 2, *Project Description*, of the 2024 PEIR.

While SCAG is required to prepare a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), SCAG lacks the legal authority to require the decision makers of cities and counties to adopt or amend their respective land use policies, such as general plan, housing element, and zoning code amendments that would implement the land use patterns included in the SCS component of Connect SoCal 2024. Furthermore, SCAG lacks the legal authority to implement land use designations in the SCS component of the Plan or the alternatives. There are a vast variety of specific land use scenarios at the local level that could achieve Plan objectives to a similar extent. SCAG is aware that local jurisdictions have projects that have been approved and not constructed. As described in Chapter 2, *Project Description*, of the 2024 PEIR, SCAG worked with each local jurisdiction through the Local Data Exchange (LDX) process to identify local land use plans and visions for growth patterns sourced from local jurisdictions and approved projects that each jurisdiction judges to be reasonably foreseeable. Pursuant to CEQA, the range of alternatives considered in this 2024 PEIR illustrates the different environmental consequences of distinct regional-level alternatives to Connect SoCal 2024.

Feasibility is one of the evaluation criteria for consideration of alternatives to the Plan. CEQA provides that among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of technology and/or infrastructure, whether the alternative can be accomplished within a reasonable period of time, and whether the proponent can reasonably acquire, control or otherwise have access to the alternate site (or the site is already owned by the proponent)..

In previous RTP/SCS development cycles, PEIR alternatives had been aligned with planning scenarios which were the alternative land use patterns to those of the previous plans. 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 developed only one set of regional growth strategies for the Plan's land use patterns that were based on local plans and reflected regional trends and research. As part of the local plans, 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, integrating new projects and entitlements at the local level, and discussed in one-on-one meetings with the majority of local jurisdictions through a 10-month long LDX process (see Chapter 2, *Project Description*, to learn more about the Plan's LDX process). As a result, Connect SoCal 2024 is SCAG's first RTP/SCS to not modify local data inputs. Given this shift in the RTP/SCS planning for this cycle and in the absence of planning scenarios, the 2024 PEIR has modified its approach to formulating Plan alternative concepts. Therefore, the "local input" alternative raised by the commenters during the public scoping process is not needed because the growth projections for Connect SoCal 2024 are the local inputs.

As discussed in Chapter 2, *Project Description*, of the Draft PEIR, 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. Every four years, SCAG has the opportunity to monitor progress, re-adjust vision, assess new challenges, and articulate 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 (namely, the 2012 RTP/SCS, the 2016 RTP/SCS, and the 2020 RTP/SCS, also referred to as Connect SoCal 2020). A general observation emerging from these past plans and the current Plan is that the region as a whole is trending toward more sustainable growth. As local agencies incorporate RTP/SCS concepts into their own general/local plans, the previously analyzed No Project alternatives are showing signs of converging with previous regional plans. Implementing agencies have also been aligning their local plans and transportation strategies by promoting sustainable development and increasing use of transit and active transportation opportunities. Additionally, as the RTP/SCS is updated and improves each four-year cycle, it also gets closer to regional policies for more sustainable development patterns. As a result, the land use growth pattern for the CEQA-required No Project alternative (i.e., the pattern expected to occur without Connect SoCal 2024) and the options for intensification might get closer to that of the Plan.

The alternatives approach used for this 2024 PEIR represents a progression of 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 effectiveness of each of the alternatives to achieve the basic objectives of the Plan has been evaluated in relation to the statement of Plan goals and subgoals. Although the No Project Alternative is not capable of meeting most of the goals of the Project, it has been analyzed, as required by CEQA.

The alternatives are evaluated at a comparative level of detail, consistent with the provisions of CEQA Guidelines Section 15126.6(d). Concentration of development to improve the transportation network and accommodate anticipated population growth are among the guiding principles for the Plan. Development of greenfields varies widely among the alternatives. The No Project Alternative would result in greater anticipated conversion of greenfield than the Plan, while Alternative 2, *Intensified Land Use Alternative*, would reduce the development of greenfields relative to that under the Plan.

Consistent with the requirements of CEQA Guidelines Section 15126.6(d), the 2024 PEIR analysis provides information for the alternatives, including the No Project Alternative to allow meaningful evaluation, analysis, and comparison with the Plan, inclusive of direct, indirect, and cumulative impacts (**Table B-1, Comparison of Environmental Impacts for Connect SoCal 2024 and Alternatives**). The evaluation demonstrates if the alternative is able to avoid or reduce the significant and unavoidable effects of the Project.

TABLE B-1 Comparison of Environmental Impacts for Connect SoCal 2024 and Alternatives

ENVIRONMENTAL ISSUE	CONNECT SOCAL 2024	ALTERNATIVE 1: NO PROJECT	ALTERNATIVE 2: INTENSIFIED LAND USE ALTERNATIVE
<b>Aesthetics</b>			
Scenic Vistas (AES-1)	Significant	Similar (Significant)	Similar (Significant)
Scenic Resources (AES-2)	Significant	Less (Significant)	Less (Significant)
Visual Character (AES-3)	Significant	Similar (Significant)	Less (Significant)
Light and Glare (AES-4)	Significant	Similar (Significant)	Similar (Significant)
<b>Agriculture and Forestry Resources</b>			
Convert Prime Farmland (AG-1)	Significant	Similar (Significant)	Similar (Significant)
Conflict with Williamson Act (AG-2)	Significant	Similar (Significant)	Less (Significant)
Conflict with forest land zoning (AG-3)	No Impact (Timberland) Significant (Forest Land)	Similar (No Impact [Timberland]; Significant [Forest Land])	Similar (No Impact [Timberland]; Significant [Forest Land])
Loss of forest land (AG-4)	Significant	Similar (Significant)	Less (Significant)
Other changes that result in loss of farmland or forest land (AG-5)	Significant	Greater (Significant)	Less (Significant)
<b>Air Quality</b>			
Conflict with Air Quality Plans (AQ-1)	Significant (except for regional federal transportation conformity requirements)	Greater (Significant at regional and project level)	Similar (Significant except for regional federal transportation conformity requirements)
Cumulatively considerable net increase in criteria pollutants (AQ-2)	Significant	Greater (Significant)	Less (Significant)
Expose sensitive receptors (AQ-3)	Significant	Similar (Significant)	Similar (Significant)
Odor (AQ-4)	Significant	Similar (Significant)	Similar (Significant)
<b>Biological Resources</b>			
Sensitive Species (BIO-1)	Significant	Similar (Significant)	Less (Significant)
Riparian Habitat (BIO-2)	Significant	Similar (Significant)	Less (Significant)
Wetlands (BIO-3)	Significant	Similar (Significant)	Less (Significant)
Migratory Fish/Birds (BIO-4)	Significant	Similar (Significant)	Similar (Significant)
Tree Preservation (BIO-5)	Significant	Similar (Significant)	Less (Significant)
Local Plans/HCPs (BIO-6)	Significant	Similar (Significant)	Similar (Significant)
<b>Cultural Resources</b>			
Historical Resources (CUL-1)	Significant	Greater (Significant)	Greater (Significant)
Archeological Resources (CUL-2)	Significant	Greater (Significant)	Less (Significant)
Disturb Human Remains (CUL-3)	Significant	Greater (Significant)	Less (Significant)

ENVIRONMENTAL ISSUE	CONNECT SOCAL 2024	ALTERNATIVE 1: NO PROJECT	ALTERNATIVE 2: INTENSIFIED LAND USE ALTERNATIVE
<b>Energy</b>			
Wasteful and inefficient use of energy (ENR-1)	Significant	Greater (Significant)	Less (Significant)
Conflict with or obstruct renewable energy plans (ENR-2)	Significant	Similar (Significant)	Similar (Significant)
<b>Geology and Soils</b>			
Fault rupture, ground shaking, ground failure/ liquefaction, landslides (GEO-1)	Significant	Similar (Significant)	Similar (Significant)
Soil Erosion (GEO-2)	Significant	Greater (Significant)	Less (Significant)
Unstable Soil (GEO-3)	Significant	Similar (Significant)	Less (Significant)
Expansive Soil (GEO-4)	Significant	Similar (Significant)	Less (Significant)
Septic Systems (GEO-5)	Significant	Similar (Significant)	Less (Significant)
Paleontological Resources (GEO-6)	Significant	Greater (Significant)	Less (Significant)
<b>Greenhouse Gas Emissions</b>			
Generate greenhouse gas emission (GHG-1)	Significant	Greater (Significant)	Similar
Conflict with Plans (GHG-2)	Significant (except for regional consistency with SB 375)	Greater (Significant)	Similar (significant except for regional consistency with SB 375)
<b>Hazards and Hazardous Materials</b>			
Routine Transport (HAZ-1)	Significant	Similar (Significant)	Similar (Significant)
Upset conditions (HAZ-2)	Significant	Similar (Significant)	Similar (Significant)
Emissions within 0.25 mile of school (HAZ-3)	Significant	Similar (Significant)	Similar (Significant)
Hazardous materials site (HAZ-4)	Significant	Similar (Significant)	Similar (Significant)
Airport hazards (HAZ-5)	Significant	Similar (Significant)	Similar (Significant)
Emergency response and evacuation plans (HAZ-6)/ (WF-1) and Emergency access (TRA-4)	Significant	Greater (Significant)	Less (Significant)
<b>Hydrology and Water Quality</b>			
Violate water quality standard (HYD-1)	Significant	Greater (Significant)	Less (Significant)
Decrease groundwater (HYD-2)	Significant	Greater (Significant)	Less (Significant)
Erosion or siltation (HYD-3A)	Significant	Greater (Significant)	Less (Significant)
Flooding (HYD-3B)	Significant	Greater (Significant)	Less (Significant)
Stormwater runoff (HYD-3C)	Significant	Greater (Significant)	Less (Significant)
Impede or redirect flood flows (HYD-3D)	Significant	Greater (Significant)	Less (Significant)
Flood, seiche, tsunami (HYD-4)	Significant	Similar (Significant)	Similar (Significant)
Conflict with water quality control plan (HYD-5)	Significant	Similar (Significant)	Similar (Significant)

ENVIRONMENTAL ISSUE	CONNECT SOCAL 2024	ALTERNATIVE 1: NO PROJECT	ALTERNATIVE 2: INTENSIFIED LAND USE ALTERNATIVE
<b>Land Use and Planning</b>			
Physically divide a community (LU-1)	Significant	Less (Significant)	Similar (Significant)
Conflict with land use plans (LU-2)	Significant	Less (Significant)	Similar (Significant)
<b>Mineral Resources</b>			
Loss in availability of mineral resources (MIN-1)	Significant	Greater (Significant)	Less (Significant)
Loss of locally important mineral resources (MIN-2)	Significant	Greater (Significant)	Less (Significant)
<b>Noise</b>			
Temporary or permanent increase in noise levels in excess of established standards (NOI-1)	Significant	Similar (Significant)	Less (Significant)
Groundborne vibration or noise (NOI-2)	Significant	Similar (Significant)	Similar (Significant)
Airport noise (NOI-3)	Significant	Similar (Significant)	Similar (Significant)
<b>Population and Housing</b>			
Induce unplanned population growth (POP-1)	Significant	Similar (Significant)	Similar (Significant)
Displace people or housing (POP-2)	Significant	Similar (Significant)	Greater (Significant)
<b>Public Services</b>			
Fire (PS-1)	Significant	Similar (Significant)	Less (Significant)
Police (PS-2)	Significant	Similar (Significant)	Less (Significant)
Schools (PS-3)	Significant	Similar (Significant)	Less (Significant)
Library (PS-4)	Significant	Similar (Significant)	Less (Significant)
<b>Recreation</b>			
Increase park use (REC-1)	Significant	Similar (Significant)	Similar (Significant)
Construction of new parks (REC-2) and Parks (PS-5)	Significant	Similar (Significant)	Similar (Significant)
<b>Transportation</b>			
Conflict with program, plan, ordinance, or policy addressing circulation system (TRA-1)	Significant	Greater (Significant)	Similar (Significant)
Conflict with CEQA Guidelines Section 15064.3(b) (TRA-2)	Significant	Greater (Significant)	Less (Significant)
Increase hazards (TRA-3)	Significant	Greater (Significant)	Similar (Significant)
<b>Tribal Cultural Resources</b>			
Adverse change in a TCR (TCR-1)	Significant	Greater (Significant)	Less (Significant)
<b>Utilities and Service Systems</b>			
New or expanded water, wastewater treatment, storm water, electric, natural gas, or telecommunications facilities (UTIL-1)	Significant	Similar (Significant)	Less (Significant)

ENVIRONMENTAL ISSUE	CONNECT SOCAL 2024	ALTERNATIVE 1: NO PROJECT	ALTERNATIVE 2: INTENSIFIED LAND USE ALTERNATIVE
New or expanded wastewater treatment (UTIL-2)	Significant	Similar (Significant)	Similar (Significant)
Sufficient water supply (UTIL-3)	Significant	Greater (Significant)	Less (Significant)
Generate excess solid waste or conflict with statutes (UTIL-4)	Significant	Similar (Significant)	Similar (Significant)
Comply with statues and regulations (UTIL-5)	Significant	Similar (Significant)	Similar (Significant)
<b>Wildfire</b>			
Slope, prevailing winds may exacerbate wildfire risk (WF-2)	Significant	Greater (Significant)	Less (Significant)
Expose people or structures to wildland fires (HAZ-7)	Significant	Greater (Significant)	Less (Significant)
Installation or maintenance of infrastructure that may exacerbate fire risk (WF-3)	Significant	Greater (Significant)	Less (Significant)

Source: ESA 2023

### B.6.3 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

#### DESCRIPTION OF ALTERNATIVE

The No Project Alternative is required by CEQA Guidelines Section 15126.6I(2) and assumes that the Plan would not be implemented. The No Project Alternative allows decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative 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)). The projected impacts of the Plan are compared to the impacts from the continuation of the existing plan (CEQA Guidelines Section 15126.6(e)). The No Project Alternative is aligned with the baseline discussion in the Plan and includes transportation projects that are in place at the time of preparation of Connect SoCal 2024 and that are included in the first year of the previously conforming transportation plan and/or FTIP. “Exempt projects” include safety projects and certain mass transit projects, transportation control measures (TCM) that are approved by the State Implementation Plan (SIP), and project phases that were authorized by the Federal Highway Administration (FHWA)/Federal Transportation Agency (FTA) prior to expiration of SCAG’s conformity finding for the adopted Connect SoCal 2024. These exempt projects would also be included in the No Project Alternative since they could move forward in the absence of an adopted Connect SoCal 2024 (FHWA 2010).

The land use strategies included in the No Project Alternative are based on the existing land use plans and trending socioeconomic growth projection to the future (2050) updated with the same jurisdictional local input population, household, and employment data as those in Connect SoCal 2024 to reflect the most recent local input growth estimates in the region.



## EFFECTIVENESS IN MEETING PROJECT OBJECTIVES

Although the No Project Alternative is not capable of meeting any of the goals of the Project, it has been analyzed, as required by CEQA.

## ABILITY TO AVOID OR SUBSTANTIALLY LESSEN THE SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PLAN

The No Project Alternative does not avoid the significant and unavoidable impacts of the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources.

As set forth in detail in PEIR Chapter 4, *Alternatives*, Alternative 1, the No Project Alternative, would result in *greater* impacts than the Plan in the following 14 resource areas: Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

Alternative 1 would result in *similar* impacts as the Plan in the following four resource areas: Noise, Population and Housing, Public Services, and Recreation.

Alternative 1 would result in less severe impacts compared to the Plan for the following two resource areas: Aesthetics (Scenic Resources) and Land Use and Planning.

On balance, the Project is environmentally superior compared to Alternative 1, the No Project Alternative.

## FINDINGS AND RATIONALE

The No Project Alternative does not avoid the significant and unavoidable impacts of the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources. SCAG Regional Council finds that specific economic, financial, legal, social, technological, or other considerations, including policy considerations, make Alternative 1 infeasible, and rejects this Alternative for the following reasons.

**Reason 1.** Alternative 1 fails to meet all the project objectives as follows:

### **Mobility: Build and maintain an integrated multimodal transportation network**

*Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions*

The No Project Alternative would not include the same suite of transportation investments that would occur under the Plan, and as such it would not result in improved safety, improved air quality, or the minimization of greenhouse gas emissions to the same extent as the Plan.

*Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities*

The No Project Alternative would not fund or implement transportation projects to the same extent as the Plan to ensure that reliable, accessible, affordable and appealing travel options are readily available, and thus would not enhance equity in communities where such options are most needed to the same extent as the Plan.

*Support planning for people of all ages, abilities and backgrounds*

The No Project Alternative would not implement the Plan's Regional Planning Policies and Implementation Strategies that are intended to support equitable planning efforts in the region.

### **Communities: Develop, connect and sustain communities that are livable and thriving**

*Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances*

The No Project Alternative would not result in increased mobility options resulting from transportation investments that would occur under the Plan, and also would not reduce travel distances given the lack of regional transportation improvements and dispersed development pattern relative to the Plan.

*Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households*

The No Project Alternative would result in increased single-family housing development and less diverse mix of housing stock, particularly in urban centers where more transit options are available, and would not foster increased affordability, accessibility and opportunities for all households.

### **Environment: Create a healthy region for the people of today and tomorrow**

*Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change*

The No Project Alternative would not improve the resilience of communities and associated infrastructure, particularly in established communities with aging facilities that are at greater risk of disruption and failure during extreme weather, natural disasters, or other climate-related stressors.

*Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water*

The No Project Alternative would not implement the suite of transportation improvements that would occur under the Plan, and also would not implement the Plan's Regional Planning Policies and Implementation Strategies that are intended to elicit a development pattern that improves air quality, reduces greenhouse gas emissions and enables more sustainable use of energy and water.

*Conserve the region's resources*

The No Project Alternative would not result in increased conservation of natural resources that would otherwise occur under the Plan.

**Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents**

*Improve access to jobs and educational resources*

The No Project Alternative would not result in transportation investments that foster improved access for residents of the region, particularly in underserved urban areas and rural areas lacking transportation options, and also would not implement the Plan's Regional Planning Policies and Implementation Strategies that result in a development pattern that facilitates the provision of opportunities for jobs and education in proximity to a variety of housing types.

*Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities*

The No Project Alternative would not achieve reductions in air pollutant emissions to achieve air quality goals, or reduce greenhouse gas emissions that contribute to climate change and associated adverse effects on community resilience, and would not result in major transportation investments in the region that support an efficient goods movement system and improved quality of life for residents.

**Reason 2.** Alternative 1 does not avoid or substantially lessen the significant and unavoidable environmental impacts for the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources.

**Reason 3.** Alternative 1 is legally infeasible. It does not meet the requirements of federal transportation planning law. Pursuant to 23 USC Section 134(i), SCAG is required to "prepare and update" its RTP every four years if it encompasses an area designated as nonattainment under the federal Clean Air Act. Nor would Alternative 1 include the SCS as a component to the RTP as required pursuant to SB 375 (California Government Code Section 65080(b)(2)(B)). Alternative 1 also does not meet the requirements of 23 USC Section 134(h)(1), which requires that the RTP contain projects and strategies that will:

- A. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
- B. Increase the safety of the transportation system for motorized and non-motorized users;
- C. Increase the security of the transportation system for motorized and non-motorized users;
- D. Increase the accessibility and mobility of people and for freight;
- E. Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
- F. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
- G. Promote efficient system management and operation; and
- H. Emphasize the preservation of the existing transportation system.

**Reason 4.** The No Project Alternative does not avoid the significant and unavoidable impacts of the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources. The Plan would have less-than-significant impacts when compared to the No Project Alternative.

For the reasons described above, SCAG Regional Council finds that the specific economic, legal, social, technological, and environmental consideration summarized herein make Alternative 1 infeasible for consideration.

## **B.6.4 ALTERNATIVE 2: INTENSIFIED LAND USE ALTERNATIVE**

### **DESCRIPTION OF ALTERNATIVE**

The Intensified Land Use Alternative (also referred to as “Alternative 2”) 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. Specifically, the growth pattern associated with this alternative optimizes growth in PDAs, including in urban areas and suburban town centers, transit-oriented developments (TODs), transit priority areas (TPAs), livable corridors, and neighborhood mobility areas (NMAs). It includes a greater progressive job-housing distribution optimized for TODs and infill in PDAs. It includes the same transportation investments as the Plan. This alternative considers the basis of the Plan with enhancements to accelerate the SB 375 GHG emissions reduction trend into 2050 and beyond, and includes related improvements for air quality, livability, public health, active transportation opportunities, and affordability.

### **EFFECTIVENESS IN MEETING PROJECT OBJECTIVES**

The Intensified Land Use Alternative is capable of meeting most of the goals and subgoals of the Plan. However, because it would place a large portion of growth in existing communities it may conflict with local plans or place a burden on some community facilities such as parks and other services to a greater extent than the Plan. Therefore, it is less effective in meeting the following goals and subgoals:

**Communities: Develop, connect, and sustain communities that are livable and thriving.**

*Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.*

The Intensified Land Use Alternative would address this subgoal in some respects more than the Plan, however, the increased density in urban areas could result in communities that while human-centered some services and infrastructure facilities may be over-burdened which could make them less appealing and therefore would appear less human-centered. The emphasis on development in urban communities may result in overuse of parks and other services (police, fire, schools, library) which has the potential to result in quality of life impacts in urban areas. The resulting deficiencies in park facilities, fire and police protection services, and schools and libraries in areas that are currently underserved or would become underserved under the Intensified Land Use Alternative could create or exacerbate inequities in livability and opportunities for quality recreation, education, public safety, and community facilities in affected areas. Furthermore, a focus on development in

existing urbanized areas may limit the potential growth and development of communities in rural and suburban settings with more limited transportation options and public services and facilities.

**Environment: Create a healthy region for the people of today and tomorrow.**

*Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.*

As for the above sub-goal, the Intensified Land Use Alternative could result in too many people for the services and infrastructure facilities to accommodate comfortably. In areas where public services and facilities become overburdened and insufficient to meet growing demands, the community may be less resilient and unable to adequately respond to acute disruptions like natural disasters or other emergency conditions.

## **ABILITY TO AVOID OR SUBSTANTIALLY LESSEN THE SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PLAN**

Of the two alternatives, the Intensified Land Use Alternative would be considered the environmentally superior alternative due to fewer impacts including reduced VMT and GHG emissions, and because it would substantially restrict the use of land for single-family development. This alternative concentrates development in existing urban centers and near transit stations and activity centers. As such, the Intensified Land Use Alternative has less impact on rural and undeveloped areas, specifically greenfields. However, the Intensified Land Use Alternative would have more severe impacts on the built environment (aesthetics; agriculture and forestry resources; air quality – sensitive receptors; historical resources – built environment; land use; recreation; transportation; and utilities and service systems).

As set forth in detail in PEIR Chapter 4, *Alternatives*, Alternative 2, Intensified Land Use Alternative, would result in *greater* impacts than the Project in the following two resource areas: Historical Resources and Population and Housing.

Alternative 2 would result in *similar* impacts as the Project in the following two resource areas: Land Use and Planning and Recreation.

Alternative 2 would result in somewhat less adverse impacts for some issues in 17 of the 20 environmental topics that were analyzed, including Aesthetics, Agriculture and Forestry Resources, Air Quality (regional emissions), Biological Resources, Archaeological Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Noise, Public Services, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

On balance, Alternative 2, the Intensified Land Use Alternative, is environmentally superior compared to the Project.

## **FINDINGS AND RATIONALE**

The SCAG Regional Council finds that specific economic, financial, legal, social, technological, or other considerations, including policy considerations, make Alternative 2 infeasible and rejects this Alternative for the following reasons.

**Reason 1.** Alternative 2 meets most but not all of the project objectives. It is less effective than the project with respect to the following goals and subgoals:

**Communities: Develop, connect, and sustain communities that are livable and thriving.**

*Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.*

The Intensified Land Use Alternative would address this subgoal in some respects more than the Plan as it would encourage more development in infill areas. However, the increased density in urban areas could result in communities that, while human-centered for some services and infrastructure facilities, may result in them becoming over-burdened. This, in turn, could make them less appealing, and therefore could in fact be less human-centered. The emphasis on development in urban communities may result in overuse of parks and other services (police, fire, schools, library) which has the potential to result in quality of life impacts in urban areas. The resulting deficiencies in park facilities, fire and police protection services, and schools and libraries in areas that are currently underserved or would become underserved under the Intensified Land Use Alternative could create or exacerbate inequities in livability and opportunities for quality recreation, education, public safety, and community facilities in affected areas. Furthermore, a focus on development in existing urbanized areas may limit the potential growth and development of communities in rural and suburban settings with more limited transportation options and public services and facilities.

**Environment: Create a healthy region for the people of today and tomorrow.**

*Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.*

As for the above sub-goal, the Intensified Land Use Alternative could result in too many people for the services and infrastructure facilities to accommodate comfortably. In areas where public services and facilities become overburdened and insufficient to meet growing demands, the community may be less resilient and unable to adequately respond to acute disruptions like natural disasters or other emergency conditions.

**Reason 2.** While the Intensified Land Use Alternative would be considered the environmentally superior alternative because of the more compact land use patterns fewer emissions and reduced VMT, this alternative requires implementation of the same mitigation measures required for the Connect SoCal 2024 Plan and would not resolve any of the significant and unavoidable impacts of the Plan. However, the more intensified and compact land use development pattern would result in somewhat less adverse impacts to energy, land, and water resources due to the denser pattern of development. The Intensified Land Use Alternative would also achieve greater overall reductions in criteria air pollutants and greenhouse gas emissions, as a result of the more compact pattern of land use development.

**Reason 3.** The Intensified Land Use Alternative is not capable of avoiding any of the significant and unavoidable impacts of the Plan, because those impacts are primarily associated with net increase in population anticipated for the SCAG region.

For the reasons described above, SCAG Regional Council finds that the specific economic, legal, social, technological, and environmental consideration summarized herein make Alternative 2 infeasible for consideration.

## B.7 FINDINGS REGARDING MITIGATION MONITORING AND REPORTING PROGRAM

### B.7.1 REQUIREMENTS OF MITIGATION MONITORING AND REPORTING PROGRAM

According to PRC Section 21081.6, CEQA requires that when a public agency is making the findings required by Section 21081, the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted to mitigate or avoid significant effects on the environment.

SCAG, through its governing body, the Regional Council, hereby finds that the MMRP meets the requirements of PRC Section 21081.6 by providing a monitoring program designed to ensure compliance during implementation of the Plan. The MMRP monitors the mitigation measures to be implemented by SCAG, and the mitigation measures that can and should be considered by lead agencies at the individual project-level, as applicable and feasible. Project-level mitigation may be required as a result of evaluation and entitlement of subsequent transportation and developments projects during implementation of the Plan and are wholly within the authority, responsibility, and/or jurisdiction of project-level lead agencies or other agencies serving as lead agencies under CEQA in subsequent project- and site-specific design, CEQA review, and decision-making processes.

## B.8 FINDINGS REGARDING LOCATION AND CUSTODIAN OF DOCUMENTS

### B.8.1 LOCATION AND CUSTODIAN OF DOCUMENTS

California Code of Regulations Section 15091(e), *California Environmental Quality Act Guidelines*, requires the public agency to specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which the decision is based. Each PEIR chapter or environmental analysis section contains a list of all sources used in the preparation of the environmental analysis. Unless otherwise noted, source materials are located at SCAG Main Office, which shall also serve as the custodian of the documents constituting the record of proceedings upon which the Regional Council, the governing board for SCAG, has based its decision related to the project. The designated location and custodian of documents is as follows:

**Southern California Association of Governments**

Attn: Ms. Karen Calderon

900 Wilshire Boulevard, Suite 1700

Los Angeles, California 90017

Telephone: 213.236.1983

E-Mail: [ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov) <mailto:ok@scag.ca.gov>

For purposes of CEQA, the Record of Proceedings for Connect SoCal 2024 consists of the following documents, at a minimum:

- The Notice of Preparation (NOP), Notice of Availability, Notice of Determination, and all other public notices issued by SCAG and in conjunction with the Plan.
- The 2024 Draft and Final PEIRs, including responses to written comments submitted by agencies or members of the public during the public comment periods on the NOP and the draft 2024 PEIR, comments received

after the close of the public comment appendices and technical studies included or referenced in the Draft and 2024 Final PEIRs.

- The Draft and Final Connect SoCal 2024 including all final Technical Reports maps, white papers or other planning documents prepared for the Plan.
- All written comments submitted by agencies or members of the public during the 30-day public comment period on the NOP and the 65-day public comment period on the Draft PEIR.
- All comments submitted by agencies or members of the public during the 72-day public comment period on the Draft Connect SoCal 2024.
- All written and verbal public testimony presented during a noticed public hearing for Connect SoCal 2024.
- All final staff reports, agendas, presentations, and meeting materials for public meetings and public hearings for the PEIR and Plan.
- The MMRP for the Plan.
- All Findings, Statement of Overriding Considerations, and resolutions adopted by the SCAG Regional Council in connection with the Plan, and all documents cited or referred to therein. Matters of common knowledge to SCAG, including but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, in addition to those cited above.
- Any other materials required to be in the Record of Proceedings by Public Resources Code Section 21167.6(e).

References associated with the 2024 PEIR, and technical analysis related to the 2024 PEIR for the Plan that are not available from SCAG, are located at Environmental Science Associates.

**Environmental Science Associates**

Attn: David Crook, AICP, LEED AP  
626 Wilshire Blvd # 1100  
Los Angeles, CA 90017  
Phone: (213) 599-4300  
E-mail: [DCrook@esassoc.com](mailto:DCrook@esassoc.com)

Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request.

## B.9 CERTIFICATION REGARDING INDEPENDENT JUDGMENT

Pursuant to PRC Section 21082.1(c), SCAG certifies that the Regional Council, as the governing body for SCAG, has independently reviewed and analyzed the Final Program Environmental Impact Report (2024 Final PEIR) for the Connect SoCal 2024 ("Plan" or "Project"), on behalf of SCAG. SCAG's Energy and the Environment Committee (EEC), Joint Policy Committees, Technical Working Group (TWG), and Staff have provided input and/or reviewed the Draft PEIR including supporting technical appendices prior to circulation for public review. The 2024 Final PEIR similarly has been subject to review by the EEC, Joint Policy Committees, TWG, and Staff.

It is the finding of the SCAG Regional Council that the 2024 Final PEIR fulfills environmental review requirements for the Plan, that the document constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA, and reflects the independent judgment of the SCAG Regional Council.



## B.10 SUMMARY OF FINDINGS

Based on the information contained in the record, the SCAG Regional Council incorporates the foregoing findings herein and provides this summary of findings with respect to the significant impacts on the environment resulting from Connect SoCal 2024 ("Plan" or "Project") pursuant to CEQA Guidelines Section 15091:

- Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the 2024 Final PEIR.
- Some changes and alterations are within the responsibility and jurisdiction of another public agency that can and should be adopted by such other agency; and SCAG has no concurrent jurisdiction with the other agency to deal with the identified project-level mitigation measures.
- Consistent with the provisions of CEQA Guidelines Section 15091(a)(2), SCAG has identified mitigation measures that are within the responsibility and jurisdiction of other public agencies, including lead agencies, and that can and should be considered to mitigate project-level impacts, as applicable and feasible, or other comparable measures.
- Pursuant to CEQA Guidelines Section 15091(c), SCAG has adopted a Mitigation Monitoring and Reporting Program which identifies responsible agencies for the mitigation measures.
- The mitigation measures to be implemented by SCAG as identified in the 2024 Final PEIR are feasible and are required as conditions of approval of the Plan.

Based on the foregoing findings and the substantial evidence contained in the record, and as conditioned by the foregoing findings:

- All significant effects on the environment due to the Project have been substantially lessened where feasible.
- Remaining significant effects on the environment found to be unavoidable are acceptable due to the overriding concerns set forth in the Statement of Overriding Considerations.



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