



**ORANGE COUNTY
COUNCIL OF GOVERNMENTS
Technical Advisory Committee**

Meeting Date / Location

**Tuesday, February 4, 2020
9:30 A.M. – 12:00 P.M.
IRVINE CITY HALL
CONFERENCE AND TRAINING CENTER (CTC)
1 CIVIC CENTER PLAZA
IRVINE, CALIFORNIA 92623**

<u>Agenda Item</u>	<u>Staff</u>	<u>Page</u>
INTRODUCTIONS	(Chair Nate Farnsworth, City of Yorba Linda)	
PUBLIC COMMENTS	(Chair Farnsworth)	

The agenda descriptions are intended to give members of the public a general summary of items of business to be transacted or discussed. The posting of the recommended actions does not include what action will be taken. The Technical Advisory Committee may take any action which it deems appropriate on the agenda item and is not limited in any way by the notice of the recommended action.

At this time members of the public may address the TAC regarding any items within the subject matter jurisdiction, which are not separately listed on this agenda. Members of the public will have an opportunity to speak on agenda items at the time the item is called for discussion. NO action may be taken on items not listed on the agenda unless authorized by law. Comments shall be limited to three minutes per person and an overall time limit of twenty minutes for the Public Comments portion of the agenda.

Any person wishing to address the TAC on any matter, whether or not it appears on this agenda, is requested to complete a "Request to Speak" form available at the door. The completed form is to be submitted to the TAC Chair prior to an individual being heard. Whenever possible, lengthy testimony should be presented to the TAC in writing and only pertinent points presented orally. A speaker's comments shall be limited to three minutes.

ADMINISTRATION

- | | | |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| 1. | OCCOG TAC Meeting Minutes | (Chair Farnsworth) 4 |
| | <ul style="list-style-type: none"> ◆ Draft OCCOG TAC minutes for the January 7, 2020 meeting <p><i>Recommended Action:</i> Approve OCCOG TAC minutes for the January 7, 2020 meeting, as presented or amended</p> | |

PRESENTATIONS, DISCUSSION AND ACTION ITEMS, REPORTS

- | | | | |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----|
| 2. | <p>Center for Demographic Research Update</p> <ul style="list-style-type: none"> ◆ January 1- December 31, 2019 Housing Inventory System (HIS) Data Collection ◆ SCAG/Orange County Data & Aerial Consortium ◆ 2020 SCAG RTP/SCS (Connect SoCal) Data & Entitlements Review <p><i>Recommended Action:</i> Receive report. Discussion.</p> | (Ms. Deborah Diep, Director, Center for Demographic Research) – 30 minutes | 10 |
| 3. | <p>Connect SoCal Update</p> <ul style="list-style-type: none"> ◆ OCCOG Connect SoCal comment letter <p><i>Recommended Action:</i> Receive Report. Discussion.</p> | (Chair Farnsworth and Ms. Diep) – 30 minutes | 14 |
| 4. | <p>RHNA Update</p> <ul style="list-style-type: none"> ◆ Draft RHNA Appeals Procedures <p><i>Recommended Action:</i> Receive Report. Discussion.</p> | (Chair Farnsworth and Ms. Diep) – 30 minutes | 79 |
| 5. | <p>Accessory Dwelling Units (ADU)</p> <ul style="list-style-type: none"> ◆ Discussion of new ADU laws <p><i>Recommended Action:</i> Receive Report. Discussion.</p> | (Chair Farnsworth - 15-minutes) | 105 |
| 6. | <p>CEQA Updates – LOS to VMT</p> <p><i>Recommended Action:</i> Receive Report. Discussion.</p> | (OCTA – 15 minutes) | |
| 7. | <p>Notice of Funding Availability – Local Early Action Planning Grants Program</p> <p><i>Recommended Action:</i> Receive Report. Discussion.</p> | (Chair Farnsworth- 15 minutes) | 106 |

REPORT FROM THE OCCOG EXECUTIVE DIRECTOR

MATTERS FROM OCCOG TAC MEMBERS

ANNOUNCEMENTS FROM NON-MEMBERS

ITEMS FOR NEXT MEETING

IMPORTANT DATES OR UPCOMING EVENTS

- ◆ February 3, 2020: SCAG Preview of RHNA Appeals & Final RHNA Methodology
- ◆ February 6, 2020: SCAG Regional Council Meeting
- ◆ February 24, 2020: SCAG RHNA Subcommittee Meeting
- ◆ March 5, 2020: SCAG CEHD Policy Committee Meeting
- ◆ March 5, 2020: SCAG Regional Council Meeting
- ◆ March 20, 2020: OCCOG's General Assembly at Disney Grand California Hotel and Spa
- ◆ April 2, 2020: SCAG Regional Council Meeting

**Adjourn to: MARCH 3, 2020
CITY OF IRVINE – CITY HALL
CONFERENCE AND TRAINING CENTER (CTC)
1 CIVIC CENTER PLAZA
IRVINE, CALIFORNIA 92623**



**ORANGE COUNTY
COUNCIL OF GOVERNMENTS**
Technical Advisory Committee

Draft Action Minutes

Meeting of January 7, 2020

The Orange County Council of Governments Technical Advisory Committee (TAC) meeting of January 7, 2020, was called to order by Chair Nate Farnsworth, City of Yorba Linda, at the City of Irvine City Hall, Conference and Training Center (CTC), 1 Civic Center Plaza, Irvine, California 92623 at 9:35 a.m. Attendees were invited by the Chair to introduce themselves. The list of meeting attendees is attached.

PUBLIC COMMENT:

There were no public comments.

ADMINISTRATION

1. OCCOG TAC Meeting Minutes

The OCCOG meeting minutes of December 3, 2019 were unanimously approved by the TAC as moved by Vice Chair Justin Equina, City of Irvine, and a second by Mr. Scott Reekstin, City of Tustin.

PRESENTATIONS, DISCUSSION AND ACTION ITEMS, REPORTS

2. Center for Demographic Research Update

Ms. Deborah Diep, Executive Director for the Center for Demographic Research, provided the OCCOG TAC with an update on CDR related issues, including the January 1 – December 31, 2019 Housing Inventory System (HIS) Data Collection, 2020 SCAG RTP/SCS (Connect SoCal) Data & Entitlements Review, and the SCAG/Orange County Data & Aerial Consortium.

July 1- December 31, 2019 housing construction and demolition data is due to CDR on Friday, January 24, 2020. HIS submission forms were updated in 2017 and now include the revised categories for the Accessory Dwelling Units. Please submit data to CDR using the 2017 HIS form. Revisions to prior years may use either the new or old form. Please verify that the same data reported to CDR is also provided to DOF in their annual Housing Unit Change Survey. For questions related to HIS, OCCOG TAC members should contact Tania Torres.

Due to the addition of ADUs to the HIS form and new ADU legislation going into effect January 1, 2020, the CDR would like to have a discussion with the OCCOG TAC and get feedback on the reporting of ADUs in CDR's HIS program.

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On October 31, 2019, SCAG sent an email to local jurisdictions notifying them of the opportunity to review the growth forecast for SCAG's 2020 RTP/SCS: Connect SoCal. SCAG asked jurisdictions to review their entitlement information and general plan densities at the split Traffic Analysis Zone level (SCAG Tier 2 TAZs/OCTAM TAZs split by jurisdiction boundaries) along with small area future household and employment growth for years 2016 to 2045.

CDR requested and received a copy of all the Orange County draft growth forecast data and entitlements for review. A summary of that review in comparison to the 2018 Orange County Projections, Orange County's local input into the RTP/SCS, was provided to the OCCOG TAC on November 5, 2019, the City Managers on November 6, 2019 and the OCCOG Board on November 21, 2019. The jurisdictions concurred at the OCCOG TAC that the draft RTP/SCS growth forecast does not reflect the growth vision described by SCAG (i.e., redirecting growth into priority growth areas and properly reflecting entitlements and open space), and that technical corrections need to be made to ensure the 2020 RTP/SCS growth forecast properly reflects general plan densities, entitlements, approved projects, and open space.

CDR coordinated with SCAG and collected feedback, comments and corrections for Orange County. Jurisdictions have been asked to document growth provided by the jurisdiction in the OCP-2018 dataset that reflects approved and entitled projects. The Excel file with entitlement documentation was due to CDR by Monday, December 2, 2019. CDR aggregated the documentation and made corrections to the draft SCAG growth forecast, which was submitted to SCAG on December 11, 2019.

Below is a summary of the points raised to SCAG.

1. The city and county totals have been held constant and match the information provided during the local input process as of October 1, 2018.
2. This dataset includes technical corrections to any of the 35 Orange County jurisdictions and TAZs to properly reflect development agreements, entitlements, current construction and recent construction. When housing data was corrected, population was also updated. Note that it is possible, and likely, to have population growth independent of new household growth due to natural increase.
3. Entitlements (including specific plans, development agreements and other approved projects to date), were allocated to the appropriate split city/TAZ polygon when entitlements encompassed multiple TAZs.
4. Recent construction and corrections to entitlements, open space and general plan densities were prioritized. Following that, jurisdiction totals were met by adding growth to priority growth areas (PGAs) or reducing growth outside PGAs whenever possible and consistent with local jurisdiction information.
5. Net housing activity from July 1, 2016 to July 11, 2019, provided by jurisdictions to CDR through its Housing Inventory System (HIS), totaling 27,384 units was incorporated into the revised dataset. Note that 9,432 of these were single-family detached units. The balance, 17,952, are other types of units, including ADUs.
6. Consideration of SCAG's policies and goals was made in making the technical corrections and changes, including SCAG's priority growth areas and constrained land priorities.

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7. Consideration was made in regard to general plan capacities, taking into account existing open space and open space requirements connected to future development.
8. SCAG will use this modified growth forecast in the 2020 RTP/SCS preferred/Plan scenario and PEIR and will not make changes to the dataset prior to its final adoption, which is anticipated in April 2020, without first consulting with CDR and the Orange County jurisdictions.
9. CDR will work with SCAG and Orange County jurisdictions to continue to expand and incorporate any new or updated entitlement information into SCAG's entitlement database, including assignments to the city/TAZ split for use in future RTP/SCS iterations.

OCP

It is strongly recommended that SCAG utilize the OCP-2018 dataset provided to SCAG during the growth forecast local input development process. Our collaborative process ensures as accurate and realistic a forecast as possible. Orange County's local input surpasses the regional SCS in terms of housing growth mix. Of the total household growth in OCP-2018, from 2016 to 2045, only 19% will be single-family detached households and 81% will be some form of attached unit. The housing stock mix will change from a ratio of 49:51 (SFD to attached product) in 2016 to 46:54 by 2045. The household mix will change from 50:50 to 47:53 (SFD to attached ratio). These surpass all five growth scenarios reported in the 2020 RTP/SCS "Connect SoCal" Sustainability Technical Report, including even the most aggressive scenario, "Accelerated Tomorrow".

Households, Housing Units, & General Plan Capacity

Note that the OCP, into which jurisdictions provide direct input, uses the primary variable of housing units. Households (occupied housing units) are a secondary variable developed for OCTA's long range model, OCTAM, which is also provided to SCAG. (There may only be one "household" per housing unit.) Growth in households can be higher than housing unit growth in previously-developed areas based on overall demand over the projection period. This is due to housing supply not equaling demand and, thus, over time, a number of existing vacant housing units may become occupied, even in areas where no additional housing units will be constructed. This is the case in Orange County and explains, in part, how existing demand is reflected in Orange County's household projection.

Therefore, caution must be taken to ensure household growth does not exceed the number of housing units constructed, or general plan capacity, in newly-developing areas, as the number of total households cannot exceed the number of total dwelling/housing units. Households and household growth should always be looked at in comparison to total housing units; that comparison would also be one part of a general plan capacity analysis. Without the detailed methodology and corresponding data inputs and outputs used by SCAG and/or its consultant to calculate general plan densities at the parcel and city/Tier 2 TAZ levels, it cannot be verified that SCAG's growth forecast does not exceed general plan densities throughout the entire county and region. A larger, detailed technical discussion is needed on general plan capacities and housing, especially in regard to areas that have pre-existing development, and how maxing out

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general plan capacity can result in changes to the dwelling unit mix, especially when ADUs are involved.

Orange County agencies are partnering with SCAG to pool resources to create purchase online and GIS-accessible aerial imagery for Orange County. This is patterned off of LA County's collaborative GIS effort known as LARIAC (Los Angeles Region Imagery Acquisition Consortium). This joint effort would reduce the cost of purchasing aerial imagery and other GIS information that can be used by all departments within an agency without the need for GIS software by including a user-friendly, non-GIS platform; GIS users would have access to GIS data. Imagery and reference information would be collected in late spring or early summer 2020, which would provide a critical baseline reference for the 2020 U.S. Decennial Census and the 2024 RTP/SCS. 2020 will also be the base year for CDR's 2022 Orange County Projections (OCP). Some of the goals are to reduce or eliminate duplicate purchases across the region, reduce costs using economies of scale, allow for unlimited and cross-departmental users within an agency. Some sample uses are:

- Reference/point-in-time snapshots
- Measuring height of buildings, distance between manhole openings, curb-to-curb
- Counting number of floors in a building
- Sidewalk analyses
- Tree canopy coverage
- Vegetation coverage

The total project cost for Cycle 1 is \$332,803. Currently, 11 agencies have indicated participation. Funding is currently \$6,083 below the project total and the effort is still looking for additional participants. Agencies interested in participation should contact Javier Aguilar, SCAG: (213) 236-1845 Cell: (213) 999-1252 aguilar@scaq.ca.gov .

Action: Received report. Discussion

3. Connect SoCal Update

Mr. Farnsworth and Ms. Diep provided the OCCOG TAC with an update on the ad-hoc committee for the Connect SoCal, the 2020 Regional Transportation Plan and Sustainable Communities Strategy (2020 RTP/SCS). Two ad-hoc meetings were held on December 17, 2019 and December 19, 2019. Comments were made on big picture issues (e.g. growth forecast and PEIR performance measures) and text grammar. The next ad hoc meeting will occur on January 8, 2020. Comment letters to SCAG are due on January 24, 2020.

Action: Received report. Discussion

4. Accessory Dwelling Units (ADU)

Mr. Farnsworth announced the new state laws for ADUs are now effective. The City of Westminster and the City of La Habra each have urgency ordinances available for reference.

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REPORT FROM CHAIR/VICE CHAIR

There was no additional report from the Chair or Vice Chair.

REPORT FROM THE EXECUTIVE DIRECTOR

There was no report from the Executive Director.

MATTERS FROM OCCOG TAC MEMBERS

There were no other matters from OCCOG TAC members.

ANNOUNCEMENTS FROM OCCOG TAC NON-MEMBERS

An announcement was made about an upcoming SCAG workshop to discuss RHNA.

ITEMS FOR NEXT MEETING

IMPORTANT DATES OR UPCOMING EVENTS

- ◆ January 23, 2020: OCCOG Board of Directors Meeting
- ◆ February 6, 2020: Southern California Association of Governments Regional Council
- ◆ March 20, 2020: OCCOG's General Assembly at Disney Grand California Hotel and Spa

ADJOURNMENT

The meeting was adjourned by Chair Farnsworth until Tuesday, March 3, 2020 at the City of Irvine City Hall, Conference and Training Center, 1 Civic Center Plaza, Irvine, California 92623.

Submitted by:

Justin Equina, City of Irvine
OCCOG TAC Vice Chair

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Attendees List for January 7, 2020 Meeting

Justin Equina, City of Irvine
Derek Bingham, City of Rancho Santa Margarita
Nate Farnsworth, City of Yorba Linda
Joanna Chang, County of Orange
Sandie Kim, City of Westminster
Joanne Hwang, City of Anaheim
Izzak Miseles, City of Stanton
Elaine Lister, City of Mission Viejo
Justin Arios, City of Costa Mesa
Christopher Wright, City of San Clemente
Kyle Webber, City of San Clemente
Jaime Murillo, City of Newport Beach
Ron Santos, City of Lake Forest
Jay Wu, City of Laguna Hills
Nicolle Aube, City of Huntington Beach
John P. Ramirez, City of Cypress
Erich List, City of Laguna Niguel
Chad Ortlieb, City of Orange
Suzan Ehdaie, City of Orange
Scott Reekstin, City of Tustin
Deborah Diep, Center for Demographic Research/California State University Fullerton
Tania Torres, Center for Demographic Research/California State University Fullerton
Virginia Gomez, Transportation Corrido Agencies
Marnie Primmer, Orange County Council of Governments
Melanie McCann, City of Santa Ana
Chris Chung, City of Garden Grove
David Lopez, City of La Habra
Maribeth Tinio, City of Brea
Belinda Deines, City of Dana Point
Monique Alaniz-Flejter, City of Laguna Beach
Jonathan Hughes, Southern California of Associated Governments

Item 2: Center for Demographic Research (CDR) Updates
Recommended Action: Discussion.

Reports

1. January 1- December 31, 2019 Housing Inventory System (HIS) Data Collection

July 1- December 31, 2019 housing construction and demolition data was due to CDR on Friday, January 24, 2020.

HIS submission forms were updated in 2020 to include additional sample entries and clarifications in the instructions. An additional optional column was added “Building Permit Date Issued” to assist in compiling HIS, DOF and HCD APR data. Please submit data to CDR using the new 2020 HIS form located at <http://www.fullerton.edu/cdr/HISform.xls> . Revisions to prior years may use either the new or old form. Please verify that the same data reported to CDR is also provided to DOF in their annual Housing Unit Change Survey.

CDR’s Demographic Analyst and HIS contact is Tania Torres. She can be reached at 657-278-3417 or tatorres@fullerton.edu.

2. 2020 SCAG RTP/SCS (Connect SoCal) Data & Entitlements Review

Update: In January 2020, CDR requested a copy of the revised growth forecast to verify all technical corrections were made. SCAG informed CDR that the request would not be fulfilled until mid-February. Formal comments were submitted during the 2020 RTP/SCS review period by CDR & OCCOG supporting the use of the 2018 Orange County Projections. If SCAG declined to use the local input, then the revised growth forecast with the technical corrections should be used.

Background: On October 31, 2019, SCAG sent an email to local jurisdictions notifying them of the opportunity to review the growth forecast for SCAG’s 2020 RTP/SCS: Connect SoCal. SCAG asked jurisdictions to review their entitlement information and general plan densities at the split Traffic Analysis Zone level (SCAG Tier 2 TAZs/OCTAM TAZs split by jurisdiction boundaries) along with small area future household and employment growth for years 2016 to 2045. Specifically, jurisdictions were asked to verify that all current entitlements, including any and all updates as of November 2019, are accurately reflected in the draft growth forecast.

To expedite and assist in the data review, CDR requested and received a copy of all the Orange County draft growth forecast data and entitlements for review. A summary of that review in comparison to the 2018 Orange County Projections, Orange County’s local input into the RTP/SCS, was provided to the OCCOG TAC on November 5, 2019, the City Managers on November 6, 2019 and the OCCOG Board on November 21, 2019. A data review packet was provided to jurisdictions on November 5, 2019 to document their entitled growth that was included in OCP-2018. The jurisdictions concurred at the OCCOG TAC that the draft RTP/SCS growth forecast did not reflect the growth vision described by SCAG (i.e., redirecting growth into priority growth areas and properly reflecting entitlements and open space), and that technical corrections needed to be made to ensure the 2020 RTP/SCS growth forecast properly reflects general plan densities, entitlements, approved projects, and open space.

SCAG expressed their support for making the technical corrections so the growth forecast properly reflects entitlements, approved projects, and open space. CDR coordinated with SCAG and collected feedback, comments and corrections for Orange County. Jurisdictions were asked to document growth provided by the jurisdiction in the OCP-2018 dataset that reflects approved and entitled



projects and provide that information to CDR by December 2, 2019. Jurisdictions were also asked by SCAG to submit its Data Review Form, signed by the appropriate management person. CDR aggregated the documentation and made corrections to the draft SCAG growth forecast and provided SCAG with the corrected dataset on December 11, 2019.

3. SCAG/Orange County Data & Aerial Consortium

Orange County agencies are partnering with SCAG to pool resources to create purchase online and GIS-accessible aerial imagery for Orange County. This is patterned off of LA County’s collaborative GIS effort known as LARIAC (Los Angeles Region Imagery Acquisition Consortium). <https://egis3.lacounty.gov/dataportal/lariac/>

This joint effort would reduce the cost of purchasing aerial imagery and other GIS information that can be used by all departments within an agency without the need for GIS software by including a user-friendly, non-GIS platform; GIS users would have access to GIS data. Cycle 1 would include 3-inch pixel aerial/ortho imagery, infrared, and building footprints. The services would include in-person training, webinars, and additional support. Imagery and reference information would be collected in late spring or early summer 2020, which would provide a critical baseline reference for the 2020 U.S. Decennial Census and the 2024 RTP/SCS. 2020 will also be the base year for CDR’s 2022 Orange County Projections (OCP). Some of the goals are to reduce or eliminate duplicate purchases across the region, reduce costs using economies of scale, allow for unlimited and cross-departmental users within an agency. Some sample uses are:

- Reference/point-in-time snapshots
- Measuring height of buildings, distance between manhole openings, curb-to-curb
- Counting number of floors in a building
- Sidewalk analyses
- Tree canopy coverage
- Vegetation coverage

The total project cost for Cycle 1 is \$332,803. Funding levels for jurisdictions were modified by SCAG (See FAQ 1/23/2020). Currently, 13 agencies have indicated participation (at the 1/23/2020 funding levels) and full funding has been reached to proceed with the project. Additional agencies may still participate; those interested in participation should contact Javier Aguilar, SCAG: (213) 236-1845 Cell: (213) 999-1252 aguilar@scag.ca.gov .

Attachment: SCAG Data Collaborative FAQ 1/23/2020

-
- Contact: Ms. Deborah Diep, Director, Center for Demographic Research
657/278-4596 ddiep@fullerton.edu
 - For Employment data: Ms. Ruby Zaman, Assistant Director, CDR
657/278-4709 ruzaman@fullerton.edu
 - For GIS: Mr. Ian Boles, GIS Analyst, CDR
657/278-4670 iboles@fullerton.edu
 - For HIS: Ms. Tania Torres, Demographic Analyst, CDR
657/278-3417 tatorres@fullerton.edu

SCAG/Orange County Data & Aerial Consortium

(Part of the SCAG Region Aerial Acquisition project)



DRAFT

Jurisdiction	1 Price covers 2 years	Participating?
Aliso Viejo	\$2,000	
Anaheim	\$5,000	
Brea	\$2,000	yes
Buena Park	\$2,000	
Costa Mesa	\$2,000	yes
Cypress	\$2,000	
Dana Point	\$2,000	Phase 2
Fountain Valley	\$2,000	possible
Fullerton	\$2,000	
Garden Grove	\$2,000	
Huntington Beach	\$5,000	
Irvine	\$5,000	possible
Laguna Beach	\$2,000	
Laguna Hills	\$2,000	yes
Laguna Niguel	\$2,000	yes
Laguna Woods	\$2,000	
La Habra	\$2,000	
Lake Forest	\$2,000	
La Palma	\$2,000	
Los Alamitos	\$2,000	
Mission Viejo	\$2,000	
Newport Beach	\$2,000	yes
Orange	\$2,000	
Placentia	\$2,000	
Rancho Santa Margarita	\$2,000	
San Clemente	\$2,000	yes
San Juan Capistrano	\$2,000	
Santa Ana	\$5,000	yes
Seal Beach	\$2,000	
Stanton	\$2,000	
Tustin	\$2,000	
Villa Park	\$2,000	
Westminster	\$2,000	
Yorba Linda	\$2,000	yes
County of Orange	\$15,000	

Project cost for Cycle 1: \$332,803

Includes:

- 3" aerial/ortho imagery with infrared for all Orange County (tif, ecw...)
- Building Footprints
- Ability to download and retain local copies of above data to use in GIS and/or CAD systems software
- Vendor-hosted online software application for unlimited non-GIS users to view data listed above and perform data analysis
- Training for all participants
- One price for two years' worth of access

Committed Regional Agencies:

- SCAG- \$200,000
- MWDOC- \$50,000
- OCWD- \$50,000
- OCCOG- \$20,000
- Cities- \$19,000

Project funding: Reached

Agencies considering participation:

- OCFA
- OCS

Draft pricing for jurisdictions is based on minimum base fee of \$2,000 that covers the online software/user-interface and aerial images.

CONTACT JAVIER AGUILAR IF INTERESTED IN PARTICIPATING BY FEBRUARY 29, 2020.

With unlimited user access, all departments within an agency can utilize the information to address their unique needs. This can be done on mobile devices or at their workstation instead of having to go out into the field.

Some example uses are:

- Reference/point-in-time snapshots
- Planning: Measuring height of buildings or setbacks
- Public Works: distance between manhole openings, curb-to-curb
- Fire: Counting number of floors in a building; locating fire hydrants
- Police: assessing access points on a building
- Sidewalk analyses
- Tree canopy coverage
- Vegetation coverage

Contact: Javier Aguilar, MUP, GISP; Phone: (213) 236-1845 E-mail: aguilar@scag.ca.gov

900 Wilshire Boulevard, Suite 1700, Los Angeles, CA 90017 www.scag.ca.gov

Rev.
1/23/2020

SCAG/Orange County Data & Aerial Consortium

(Part of the SCAG Region Aerial Acquisition project)



Project Overview

Through the SCAG GIS Services Program and SCAG Future Communities Initiative, SCAG is working to build a consortium in Orange County with local jurisdictions and partner agencies to procure and share orthogonal, obliques, building footprints, LiDAR and digital terrain imagery. Cycle 1 would have imagery flights completed to serve as a benchmark for the 2020 Decennial Census and RTP 2024 base year. Envisioned as a 10-year program with five two-year cycles, this data collaborative between Orange County and SCAG is part of a broader, region-wide effort SCAG is undertaking.

As part of the project, SCAG staff will manage the project, assist to secure funds, host a consortium website, and coordinate activities with agency technical staff. Currently, SCAG is working with staff from the County of Orange, Orange County cities, water districts, non-profits, special districts and other potential partners to secure needed funds for the project. Meetings have been held around Orange County to discuss the project. Contact Javier Aguilar, SCAG at aguilar@scag.ca.gov to be included on the email distribution list regarding the project and future meetings.

Objectives

1. Obtain high accuracy aerial imagery (and related products) to support local agencies' needs, such as land use and asset monitoring, pre-engineering design, and geospatial analyses.
2. Unify imagery acquisition to improve communication among Orange County agencies and SCAG.
3. Eliminate duplicate imagery acquisitions for many agencies and leverage economies of scale to obtain more and better products.
4. Save taxpayer money and increase efficiency through collaboration.
5. Integrate aerial imagery and related products with the SCAG land use database and other geographic information system (GIS) layers.

What's Included in Cycle 1?

- Aerial imagery flown in late spring/early summer 2020
 - 3" aerial/ortho imagery with infrared for all Orange County (tif, ecw...)
 - Building Footprints
- Ability to download and retain local copies of above data to use in GIS and/or CAD systems software
- Vendor-hosted online software application for unlimited non-GIS users to view data listed above and perform data analysis
- Training for all participants
- One price for two years' worth of access

Timeline

- Ongoing - Outreach to OC agencies for participation
- SCAG RFP & vendor selection in late fall 2019
- Imagery flights in ~spring 2020
- Training and outreach on product beginning in summer 2020 & ongoing throughout Cycle 1
- Products available in late 2020
- Billing for Cycle 1 in late summer 2020 (FY2020/21)

FAQs

- Cycle 2 expected to include everything in Cycle 1 plus:
 - Obliques/45-degree angle aerial imagery
 - Contours
 - LiDAR (Light Detection and Ranging)— a remote sensing method used to examine the surface of the Earth
- An agency can sign up for one cycle at a time; this is not a 10-year commitment.
- If an agency needs to drop out in future cycles, they will still have access to their original cycle's data.
- Even if you only want some of the products, there is a minimum base fee on the pricing that covers the online software/user-interface and aerial images; no city will pay less than the \$900 base fee.
- Recognizing agencies may currently be in multi-year contracts, this information can be used for future budgeting and procurement.
- Cycles run for two fiscal years:
 - Cycle 1: July 2020-June 2022
 - Cycle 2: July 2022-June 2024
 - Cycle 3: July 2024-June 2026
 - Cycle 4: July 2026-June 2028
 - Cycle 5: July 2028-June 2030
- Aerials will be flown every two years
- LiDAR- about every 5-6 years (TBD)

DRAFT

Contact: Javier Aguilar, MUP, GISP; Phone: (213) 236-1845 E-mail: aguilar@scag.ca.gov

900 Wilshire Boulevard, Suite 1700, Los Angeles, CA 90017 www.scag.ca.gov

Rev.
1/23/2020



Item 3: Connect SoCal Update
Recommended Action: Discussion.

Reports

At the November 2019 OCCOG TAC meeting, an Ad Hoc Subcommittee was formed to review the draft Connect SoCal Plan and its associated PEIR. The Subcommittee consisted of representatives from the cities of Anaheim, Irvine, San Clemente, and Yorba Linda, the County of Orange, OCCOG, CDR, OCTA, and TCA. The Subcommittee met on four separate occasions and provided comments on nearly 5,000 pages of documents between the Connect SoCal Plan, its technical reports, and the PEIR. The Subcommittee prepared 54 pages of comments. These comments were prepared for the OCCOG Board to review at their January meeting; however, due to lack of quorum, the Board was not able to take any action. However, OCCOG’s Executive Management Committee was able to convene and direct OCCOG’s Executive Director to send the comments to SCAG prior to the end of the public comment period. A brief summary of the Subcommittee’s comments are as follows:

- High-Quality Transit Corridors (HQTCS) and High-Quality Transit Areas (HQTAs)
 - Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTCS segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.
- Maintain Unbiased, Objective Tone
- Mitigation Measures items:
 - “Can and should”
 - New fees or taxes
 - Duplicative/Existing Regulations
- Address Process Concerns
 - Effective Use of the Technical Working Group
 - Subject Matter Working Groups
 - Timeline Does Not Allow For Adequate Revision
 - Do Not Cut off Regional Council Discussion
- Remain Neutral on Technology
- General formatting for clarity
 - Cities vs. Jurisdiction
 - Spell out Acronyms Prior to Using Abbreviations
 - Provide Sources for All Graphics and Tables
- Cleanup & clarification comments listed in matrix format
- Growth Forecast Recommendations:
 - SCAG utilize the 2018 Orange County Projections (OCP-2018) to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.
 - OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected.
 - OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

Attachment: January 23, 2020 OCCOG Comments for Connect SoCal 2020 RTP/SCS and PEIR



Orange County Council of Governments

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January 23, 2020

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

Subject: Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR

Transmitted via email

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.



The OCCOG TAC review and analysis was discussed by the OCCOG Board at the January 23, 2020 Board of Directors meeting and serves as the basis for OCCOG’s comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

Policy-Level Comments

1. *Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2. *High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

The alignment of SCAG’s Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating “transit access.” OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG’s definition for HQTAs. The draft RTP/SCS defines HQTAs as “generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.” The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are “corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The definition for HQTCs does not account for walkability.



OCCOG recommends revising the identification of HQTAs to reflect the nuance with certain HQTCs that fail to meet the “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTC segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.

3. *Process Concerns*

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



cycle to allow for a more robust review process that would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed prior to asking the Regional Council to adopt the final plan.

Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

4. Growth Forecast

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.



CDR requested a copy of the final draft growth forecast dataset to confirm that all the technical corrections had been included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).

5. Remain Neutral on Technology

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

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").



6. Maintain Unbiased, Objective Tone

Language throughout the draft Connect SoCal Plan and PEIR and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues, such as active transportation, public health, and land use policy. While these issues are important, using opinion-based and emotionally-charged language is inappropriate in this context.

Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

7. “Can and Should”

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

Recommendation: Change language in all project level mitigation measures to read “~~can and should~~ consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.

8. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change



over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

9. Cities vs. Jurisdiction

Throughout the 2020 RTP/SCS, PEIR, and associated appendices, there are references to “cities”. Since the SCAG region also includes counties, it is recommended that references to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate.

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

10. Spell out Acronyms Prior to Using Abbreviations

There are many different abbreviations used throughout the documents. To avoid confusion and help persons unfamiliar with technical jargon, spelling out the acronyms prior to using them for the first time is common; however, this is often missing in the Connect SoCal documents.

Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.

11. Provide Sources for All Graphics and Tables

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



Recommendation: Make it a SCAG style guide policy to include the source and date of all data used in tables, charts, maps, infographics etc., included in technical reports.

12. Fees and Taxes

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, therefore, it should not be assumed that they will be approved.

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



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not hesitate to contact me or Marnie Primmer, OCCOG Executive Director at (949) 698-2856 or marnie@occog.com.

Sincerely,



Stacy Berry, Chair of the Board

Stacy Berry

Chair

Orange County Council of Governments

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
TCA Board of Directors



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Table 1. 2020 RTP/CONNECT SOCAL COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add: <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> • Technology and associated privacy issues, • Cost of implementation and administrative methods for fee collection/revenue allocation, • Equity concerns and exemptions/credits, as applicable, • Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and • Economic assessment. <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR Households Absolute constraints Single-family Multi-family Constrained/strategic Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing closer to <u>and jobs closer together</u> , making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents PEIR ES-4, P2.0-10 PLAN p96, p113	Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTA. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 st bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was informed <u>guided</u> by the Connect SoCal Guidelines and Schedule...”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant major local</u> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the capital list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 th line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> are disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG used <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> Jobs Forecast
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p>“While the There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production...”</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>“Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas.”</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>“Non-Hispanic Whites disproportionately use automobiles and bicycling modes...”</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say “Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes...”</p>
39	Clarification	p. 32, column 1, paragraph 3	<p>“...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms.”</p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on <u>a regional jobs/housing balance</u> to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” <u>where applicable and feasible.</u> ”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The Plan plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 \$20.88 billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3 p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system." For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal commit identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects." Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT" Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> • Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and • There is little to no infrastructure to support alternative modes of transportation.
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, In this scenario</u> , trips to work, schools and other...
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools: “In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See <u>Environmental Justice Technical Report for detailed analysis on accessibility.</u>” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	“Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions." Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies." What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & Job Creation Analysis Jobs Forecast

Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
2	Correction	ES-4	Second bullet. Details a regional transportation investment given \$633.9 638.6 billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...
3	Clarification	ES-10, bullet 3	“Establish a mileage-based user fee <u>to replace the gas tax and to generate</u> a funding source for aging infrastructure and construction of other travel options”
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. “Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <u>roads, toll</u> lanes and Express/HOT lanes.”
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions’ planning/zoning regs.
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i> This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions’ codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.
11	Clarification	ES-5 Table Impact AQ-4	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	“PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”
19	Clarification	Table ES-5 p. 2.0-33	“PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
20	Clarification	Table ES-5 p. 2.0-34	“PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
21	Clarification	p. 2.0-35	Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <u>toll roads</u> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	“PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
23	Clarification	Table ES-5 p. 2.0-37	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
24	Clarification	ES-5 Table Geology and Soils	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
25	Clarification	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
26	Clarification	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
27	Clarification	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
28	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
29	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	"City and county general plans must be consistent with each other." This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need. ³⁵ HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.³⁶ HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.³⁷ <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2</p> <p>3.11-39, paragraph 2</p>	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“²³Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		<p>3.14-16, footnote 23</p> <p>3.14-22, paragraph 4</p>	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <u>Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the projected needs portion of the 6 th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the projected need portion of the 6th cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	<p>Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 nd paragraph; last sentence	Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 st paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, EXHIBIT FIGURE 2 and TABLE 2 depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read, However, yearly data since then shows that congestion has been increasing year over year since then-2011 , and this includes all the three Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction Correction	P13, column 2, paragraph 1	EXHIBIT FIGURE 3 depicts lost lane-miles... <ul style="list-style-type: none"> Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of 922 998.79 or 999..." Figure 3 shows a total of 998.79.
7	General Comment	P14	Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 nd paragraph; 5 th sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including both planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 rd paragraph; 1 st sentence	Suggested edit: One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> -region.
15	Define	P33 ff., TABLE 4	Timeframe, Short and Long -term need to be defined



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say “..supportive policies for shared ride services, such as Uber and Lyft Transportation Network Companies (TNCs)” Add a sentence suggesting that TNC’s can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace “ExpressLane” with “express lane” “ExpressLane” is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, “Forecasts for the 2017? through 2025? planning years...”
20	Define	945	LAND USE. Define small area levels in “The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative.”
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace “appendices” with “technical reports”

Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add: <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit: <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> October 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit: Over the <u>FY2020-21 through FY2024-25</u> 2021-2045 period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 st paragraph; 2 nd sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 st line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 st paragraph	Replace “2021-2045” with “FY2020-21 through FY2044-45”
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace “2021-2045” with “FY2020-21 through FY2044-45”

Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCs) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhoods with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between automobile <u>automobiles</u> do not stand out at the intersections with bicycle lane. “
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 st paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 st paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 st paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (2012). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <u>Year</u> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and exist <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and challenges <u>threats</u> analysis (SWOT analysis),....
19	Correction	Pg. 31	<ul style="list-style-type: none"> A candidate project list is incorporated in to <u>into</u> the MOU <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book. Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.



Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	“In this future, more funding is available to invest in expanded bus and rail networks...” Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	“More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible.” Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<u>z</u>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 nd paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column—“ see Section III.2 of this document. ” Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows: TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries related to <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> Local jurisdictions should conducting public outreach... Local jurisdictions should identifying locations with... Local jurisdictions should promoting best engineering... Local jurisdictions should setting speed limits that are safe..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> Local jurisdictions should supporting roadway, intersection... Local jurisdictions should promoting implementation of ... Local jurisdictions should implementing design treatments... Local jurisdictions should working with Transit network... Local jurisdictions should establishing Safe Routes for ..." <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting connecting bicycle... • Local jurisdictions should developing and implement... • Local jurisdictions should adopting Complete Streets... • Local jurisdictions should implementing pedestrian and... • Local jurisdictions should using intersection control... • Local jurisdictions should conducting bicycle education... • Local jurisdictions should supporting expanding Safe... • Local jurisdictions should utilizing SCAG’s ... • Local jurisdictions should implementing traffic calming... • Local jurisdictions where applicable should developing a... • Local jurisdictions should participating in programs to...”
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should supporting the use of dedicated... • Local jurisdictions should identifying intersections and... • Local jurisdictions should identifying and promote the... • Local jurisdictions should identifying rest stops along...”
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should developing enforcement and... • Local jurisdictions should improving data quality on... • Local jurisdictions should conducting education on the...”
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should using Intelligent... • Local jurisdictions should developing guidance...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... and • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving data collection... • Local jurisdictions should identifying high injury... • Local jurisdictions should working with the State and... • Local jurisdictions should working with transit network...”
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should promoting and expand safe... • Local jurisdictions should extending and promote late... • Local jurisdictions should developing a methodology to... • Local jurisdictions should developing and distribute a... • Local jurisdictions should designing and develop a study... • Local jurisdictions should improving enforcement with... • Local jurisdictions should increasing frequency...”
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Incorporate intersection safety into the planning grant strategy. • Local jurisdictions should incorporating Intelligent... • Local jurisdictions should implementing infrastructure... • Local jurisdictions should implementing installation of... • Local jurisdictions should planning for, and develop... • Local jurisdictions should reducing modal conflicts at...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should continuing the deployment... of • Local jurisdictions should addressing systemic risks on... • Local jurisdictions should improving the dissemination... • Local jurisdictions should targeting highest risk... • Local jurisdictions should implementing an effective... • Local jurisdictions should promoting the use of vehicle...”
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should working with the state and... • Local jurisdictions should working with local... • Local jurisdictions should promoting the most...”
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should increasing enforcement and... • Local jurisdictions should implementing education ... • Local jurisdictions should promoting the establishment... • Local jurisdictions should improving occupant...”
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Continuing to work with local jurisdictions to provide a... • Local jurisdictions should developing pedestrian safety... • Local jurisdictions should ensuring all sidewalks and... • Local jurisdictions should supporting improvements to... • Local jurisdictions should considering pedestrian needs in... • Local jurisdictions should facilitating the planning... • Local jurisdictions should increasing pedestrian crossing... • Local jurisdictions should incorporating pedestrian... • Local jurisdictions should participating in programs... • Local jurisdictions should improving pedestrian striping... • Local jurisdictions should incorporating median... • Local jurisdictions should considering installation of... • Local jurisdictions should developing citywide Safe... • Local jurisdictions should continuing to improve...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should improving safe driving... • Local jurisdictions should applying advanced technology ... • Local jurisdictions should improving work zone data..."
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> • Local jurisdictions should establishing a task force to... • Local jurisdictions should implementing the Driver... • Local jurisdictions should supporting state authorities... • Local jurisdictions should implementing and maintain... • Local jurisdictions should establishing efforts to address..."
22	Correction	Pg. 39	4 th bullet: sentence is not finished
23	Correction	Pg. 39	5 th bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> Driver's field of vision & ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>

Item 4: RHNA Update
Recommended Action: Discussion.

Reports

The Southern California Association of Governments (SCAG) has released its draft RHNA Appeals Procedures for the 6th Cycle Regional Housing Needs Assessment (RHNA) in advance of a preview to be hosted by SCAG on February 3, 2020, from 10:00 am – 12:00 pm at SCAG’s Main Office (videoconferencing and view-only webcast will be available). SCAG staff will consider any comments on the draft RHNA appeals procedures up until **February 10, 2020**. SCAG’s website lists the following additional meetings related to the RHNA process:

RHNA Subcommittee Meeting (ACTION) on the Staff-Recommended Final RHNA Methodology & Appeal Procedures

Monday, February 24, 2020

10:00 a.m. - 12:00 p.m.

SCAG Main Office

*Videoconferencing and view-only webcast available (link will be provided soon)

CEHD Policy Committee Meeting (ACTION) on the Staff-Recommended Final RHNA Methodology & Appeal Procedures

Thursday, March 5, 2020

10:00 a.m. – 12:00 p.m.

SCAG Main Office

*[Live Stream Available](#)

Regional Council Regular Meeting (ACTION) to Adopt the Final RHNA Methodology & Appeal Procedures

Thursday, March 5, 2020

12:15 p.m. – 2:00 p.m.

SCAG Main Office

*[Live Stream Available](#)

Regional Council Meeting (RECEIVE & FILE) to receive the Draft RHNA Allocation by Jurisdictions based on the RC Adopted Final RHNA Methodology

Thursday, April 2, 2020

12:15 p.m. – 2:00 p.m.

SCAG Main Office

*[Live Stream Available](#)

Attachment: Draft RHNA Appeals Procedures

6th RHNA Cycle Appeals Procedures*
(Draft for February 3, 2020 Workshop Use)

**Comments on this Workshop Draft may be submitted by Monday, February 10, 5:00 p.m. to housing@scag.ca.gov for considerations in the development of a staff-recommended RHNA Appeal Procedures for RHNA Subcommittee Action on February 24. Please see www.scag.ca.gov/rhna for additional meeting information.*

Pursuant to Government Code section 65584.05, any local jurisdiction within the SCAG region may file an appeal to modify its allocated share or another jurisdiction's share of the regional housing need included as part of SCAG's Draft Regional Housing Needs Assessment (RHNA) Allocation Plan, hereinafter referred to as the "Draft RHNA Plan." The California Department of Housing and Community Development, hereinafter referred to as "HCD", may also file an appeal to one or more jurisdiction's draft RHNA allocation. No appeal shall be allowed relating to post-appeal reallocation adjustments made by SCAG, as further described in Section II, below.

I. APPEALS PROCESS

A. DEADLINE TO FILE

The period to file appeals shall commence on April 10, 2020, which shall be deemed as the date of receipt by jurisdictions and HCD of the draft RHNA Plan. In order to comply with Government Code § 65584.05(b), a jurisdiction or HCD seeking to appeal a draft allocation of the regional housing need must file an appeal by 5:00 p.m. May 25, 2020. Late appeals shall not be accepted by SCAG.

B. FORM OF APPEAL

The local jurisdiction shall state the basis and specific reasons for its appeal on the appeal form prepared by SCAG, a copy of which is attached hereto as Exhibit "A". Additional documents may be submitted by the local jurisdiction as attachments, and all such attachments should be properly labeled and numbered.

C. BASES FOR APPEAL

Local jurisdictions shall only file an appeal based upon the criteria listed below. In order to provide guidance to potential appellants, information regarding SCAG's allocation methodology approved by SCAG's Regional Council on March 5, 2020¹, and application of local factors in the development of SCAG's adopted Final Methodology is attached

¹ This date is the scheduled date for adoption of the Final RHNA Methodology by the SCAG Regional Council. In the event of a date change, this section will be amended.

hereto as Exhibit “B”. Appeals based on “change of circumstance” can only be filed by the jurisdiction or jurisdictions where the change in circumstance occurred.

Pursuant to Government Code Section 65584.05, filed appeals must include a statement as to why the revision is necessary to further the intent of the objectives listed in Section 65584. Additionally, Government Code Section 65584.05(b) requires that all filed appeals must be consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy, or SCAG’s Connect SoCal Plan, pursuant to Government Code Section 65080(b)(2).

1. Methodology – That SCAG failed to determine the jurisdiction’s share of the regional housing need in accordance with the information described in the allocation methodology established and approved by SCAG, and in a manner that furthers, and does not undermine the five objectives listed in Government Code Section 65584(d).

2. Local Planning Factors and Information Affirmatively Furthering Fair Housing (AFFH) – That SCAG failed to consider information submitted by the local jurisdiction relating to certain local factors outlined in Govt. Code § 65584.04(e) and information submitted by the local jurisdiction relating to affirmatively furthering fair housing pursuant to Government Code § 65584.04(b)(2) and 65584(d)(5) including the following:
 - a. Each jurisdiction’s existing and projected jobs and housing relationship.
 - b. The opportunities and constraints to development of additional housing in each jurisdiction, including the following:
 - (1) lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period;
 - (2) the availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities;

- (3) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to non-agricultural uses.
 - (4) County policies to preserve prime agricultural land, as defined pursuant to Government Code § 56064, within an unincorporated area, and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to non-agricultural uses.
- c. The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.
 - d. Agreements between a county and cities in a county to direct growth toward incorporated areas of the county or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.
 - e. The loss of units contained in assisted housing developments, as defined in Government Code § 65583(a)(9), that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.
 - f. The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.
 - g. The rate of overcrowding.

- h. The housing needs of farmworkers.
 - i. The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.
 - j. The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7(commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis. For purposes of these guidelines, this applies to loss of units during a state of emergency occurring since October 2013 and have not yet been rebuilt or replaced by the time of the development of the draft RHNA methodology, or November 7, 2019.
 - k. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080, to be met by SCAG’s Connect SoCal Plan.
 - l. Information based upon the issues, strategies, and actions that are included, as available in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing completed by any city or county or the California Department of Housing and Community Development, and in housing elements
3. Changed Circumstances – That a significant and unforeseen change in circumstance has occurred in the jurisdiction after April 30, 2019 and merits a revision of the information previously submitted by the local jurisdiction. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

D. LIMITS ON SCOPE OF APPEAL

Existing law explicitly limits SCAG’s scope of review of appeals. Specifically, SCAG shall not grant any appeal based upon the following:

1. Any other criteria other than the criteria in Section I.C above.
2. A local jurisdiction's existing zoning ordinance and land use restrictions, including but not limited to, the contents of the local jurisdiction's current general plan. Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.
3. Any local ordinance, policy, voter-approved measure or standard limiting residential development. Pursuant to Government Code Section 65584.04(g)(1), any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits shall not be a justification for a determination or a reduction in a city's or county's share of regional housing need.
4. Prior underproduction of housing in a jurisdiction from the previous regional housing need allocation. Pursuant to Government Code Section 65584.04(g)(2), prior underproduction of housing in a jurisdiction from the previous housing need allocation, as determined by each jurisdiction's annual production report submitted to Government Code Section 65400(a)(2)(H) cannot be used as a justification for a determination or reduction in a jurisdiction's share of the regional housing need.
5. Stable population numbers in a jurisdiction. Pursuant to Government Code Section 65584.04(g)(3), stable population growth from the previous regional housing needs cycle cannot be used as a justification for a determination or reduction in a jurisdiction's share of the regional housing need.

E. COMMENTS ON APPEALS

At the close of the appeals period as set forth in I.A., SCAG shall notify all jurisdictions within the region and HCD of all appeals and shall make all materials submitted in support of each appeal available on its website after the close of the appeals filing period. Local jurisdictions and HCD may comment on one or more appeals within the 45 days following the end of the appeals filing period. All comments must be filed by 5:00 pm July 9, 2020. No late comments shall be accepted by SCAG.

F. HEARING BODY

SCAG’s Regional Council has delegated the responsibility of considering appeals regarding draft allocations to the RHNA Subcommittee, also referred to as the RHNA Appeals Board. All provisions of the RHNA Subcommittee’s charter shall apply with respect to the conduct of the appeal hearings. Per the RHNA Subcommittee charter, which was adopted on February 7, 2019 by the Regional Council, all decisions made by the RHNA Appeals Board are considered final and will not be reviewed by the SCAG Regional Council.

G. APPEAL HEARING

SCAG shall conduct one public hearing to consider all appeals filed and comments received on the appeals no later than August 8, 2020. This public hearing may be continued (over several days if necessary) until all appeals are heard. Notice shall be provided to the appealing jurisdictions, commenting jurisdictions, and HCD at least 21 days in advance of the hearing. The appeal hearing may take place provided that each county is represented either by a member or alternate of the RHNA Appeals Board. Alternates are permitted to participate in the appeal hearing, provided however, that each county shall only be entitled to one vote when deciding on the appeal. In alignment with the adopted RHNA Subcommittee charter, in the event the hearing involves the member’s or alternate’s respective jurisdiction, the member or alternate may elect not to participate in the discussion and vote by the RHNA Subcommittee regarding such appeal.

The hearing(s) shall be conducted to provide the appealing jurisdiction (or HCD) with the opportunity to make its case regarding a change in its draft regional housing need allocation or another jurisdiction’s allocation, with the burden on the appealing jurisdiction to prove its case. The RHNA Appeals Board need not adhere to formal evidentiary rules and procedures in conducting the hearing. An appealing jurisdiction may choose to have technical staff present its case at the hearing. At a minimum, technical staff should be available at the hearing to answer any questions of the RHNA Appeals Board. SCAG staff shall also be permitted to present its position and may make a recommendation on the technical merits of the appeal to the RHNA Appeals Board, subject to any rebuttal by the appealing jurisdiction.

H. DETERMINATION OF APPEAL

The RHNA Appeals Board shall issue a written final determination to the appealing jurisdiction after the conclusion of the public hearing(s). The final determination shall either accept, reject, or modify each appeal for a revised share. The final determinations shall be based upon the information and methodology set forth in Government Code section 65584.04 and whether the revision is necessary to further the objectives listed in Government Code section 65584(d). The final determination shall

include written findings as to how the determination is consistent with Government Code section 65584.05. The decision of the RHNA Appeals Board shall be final, and local jurisdictions shall have no further right to appeal.

In accordance with existing law, the final determination on an appeal by the RHNA Subcommittee may require the adjustment of allocation of a local jurisdiction that is not the subject of an appeal. Specific adjustments to jurisdictions not the subject of an appeal as a result of an appeal will be included as part of the Appeal Board's determination. These specific adjustments will be excluded from the cumulative total adjustments required to be reallocated as described in Section II of these Appeals Guidelines.

I. ALTERNATIVE DATA REQUIREMENTS

To the extent a local jurisdiction submits admissible alternative data or evidentiary documentation to SCAG in support of its appeal, such alternative data shall meet the following requirements:

1. The alternative data shall be readily available for SCAG's review and verification. Alternative data should not be constrained for use by proprietary conditions or other conditions rendering them difficult to obtain or process.
2. The alternative data shall be accurate, current, and reasonably free from defect.
3. The alternative data shall be relevant and germane to the local jurisdiction's basis of appeal.
4. The alternative data shall be used to support a logical analysis relating to the local jurisdiction's request for a change to its draft regional housing need allocation.

II. POST-APPEAL REALLOCATION OF REGIONAL HOUSING NEED

In accordance with existing law (*see*, Government Code Section 65584.05(g)), after the conclusion of the appeals process, SCAG shall total the successfully appealed housing need allocations. If the adjustments total seven percent (7%) or less of the regional housing need, SCAG shall distribute the adjustments proportionally, to all local jurisdictions. For purposes of these procedures, proportional distribution shall be based on the share of regional need after the appeals are determined and prior to the required redistribution.

If the adjustments total more than seven percent (7%) of the regional housing need, existing law requires that SCAG to develop a methodology to distribute the amount greater than seven percent to local governments. In this situation, SCAG will redistribute the amount greater than the seven percent based on the “residual” existing need calculation included in the adopted final RHNA methodology. To be consistent with the “residual” existing need calculation, successfully appealed units above the seven percent threshold will be redistributed to each county based on their proportion of total successful appeals. Fifty percent (50%) of each county’s amount above the regional seven percent will be redistributed based on population within a High Quality Transit Area (HQTA) and fifty percent (50%) of the amount will be redistributed based on share of regional jobs accessible. Communities designated as disadvantaged, defined in the Final RHNA Methodology as having more than fifty percent (50%) of their population in lower resource areas, will be exempt from redistribution of the amount greater than seven percent. For more information regarding the existing need distribution in the Final RHNA Methodology, please refer to Exhibit BSCAG’s adopted Final RHNA Methodology.

III. FINAL RHNA PLAN

After SCAG reallocates units to all local jurisdictions resulting from successful appeals, SCAG’s Regional Council shall review and consider adoption of the Final RHNA Plan for SCAG’s 6th cycle RHNA. This is scheduled to occur on October 1, 2020.

List of Exhibits

Exhibit A: Draft RHNA Appeal Form (*pending*)

Exhibit B: SCAG's Adopted 6th Cycle RHNA Final Methodology (*pending*)

Exhibit C:

- Government Code Section 65580
- Government Code Section 65584
- Government Code Section 65584.04
- Government Code Section 65584.05

DRAFT

State of California

GOVERNMENT CODE

Section 65584

65584. (a) (1) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.

(2) It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes. These actions shall include applicable reforms and incentives in Section 65582.1.

(3) The Legislature finds and declares that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.

(b) The department, in consultation with each council of governments, shall determine each region's existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04 and 65584.05.

(c) Notwithstanding any other provision of law, the due dates for the determinations of the department or for the council of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding

housing element revision deadline pursuant to Section 65588 by not more than 60 days.

(d) The regional housing needs allocation plan shall further all of the following objectives:

(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.

(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

(5) Affirmatively furthering fair housing.

(e) For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

(f) For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:

(1) Very low incomes as defined by Section 50105 of the Health and Safety Code.

(2) Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.

(3) Moderate incomes, as defined by Section 50093 of the Health and Safety Code.

(4) Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.

(g) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or

65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

(Amended by Stats. 2018, Ch. 989, Sec. 1.5. (AB 1771) Effective January 1, 2019.)

State of California

GOVERNMENT CODE

Section 65584.05

65584.05. (a) At least one and one-half years before the scheduled revision required by Section 65588, each council of governments and delegate subregion, as applicable, shall distribute a draft allocation of regional housing needs to each local government in the region or subregion, where applicable, and the department, based on the methodology adopted pursuant to Section 65584.04 and shall publish the draft allocation on its internet website. The draft allocation shall include the underlying data and methodology on which the allocation is based, and a statement as to how it furthers the objectives listed in subdivision (d) of Section 65584. It is the intent of the Legislature that the draft allocation should be distributed before the completion of the update of the applicable regional transportation plan. The draft allocation shall distribute to localities and subregions, if any, within the region the entire regional housing need determined pursuant to Section 65584.01 or within subregions, as applicable, the subregion's entire share of the regional housing need determined pursuant to Section 65584.03.

(b) Within 45 days following receipt of the draft allocation, a local government within the region or the delegate subregion, as applicable, or the department may appeal to the council of governments or the delegate subregion for a revision of the share of the regional housing need proposed to be allocated to one or more local governments. Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584. An appeal pursuant to this subdivision shall be consistent with, and not to the detriment of, the development pattern in an applicable sustainable communities strategy developed pursuant to paragraph (2) of subdivision (b) of Section 65080. Appeals shall be limited to any of the following circumstances:

(1) The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.

(2) The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.

(3) A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant

to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

(c) At the close of the period for filing appeals pursuant to subdivision (b), the council of governments or delegate subregion, as applicable, shall notify all other local governments within the region or delegate subregion and the department of all appeals and shall make all materials submitted in support of each appeal available on a publicly available internet website. Local governments and the department may, within 45 days, comment on one or more appeals. If no appeals are filed, the draft allocation shall be issued as the proposed final allocation plan pursuant to paragraph (2) of subdivision (e).

(d) No later than 30 days after the close of the comment period, and after providing all local governments within the region or delegate subregion, as applicable, at least 21 days prior notice, the council of governments or delegate subregion shall conduct one public hearing to consider all appeals filed pursuant to subdivision (b) and all comments received pursuant to subdivision (c).

(e) No later than 45 days after the public hearing pursuant to subdivision (d), the council of governments or delegate subregion, as applicable, shall do both of the following:

(1) Make a final determination that either accepts, rejects, or modifies each appeal for a revised share filed pursuant to subdivision (b). Final determinations shall be based upon the information and methodology described in Section 65584.04 and whether the revision is necessary to further the objectives listed in subdivision (d) of Section 65584. The final determination shall be in writing and shall include written findings as to how the determination is consistent with this article. The final determination on an appeal may require the council of governments or delegate subregion, as applicable, to adjust the share of the regional housing need allocated to one or more local governments that are not the subject of an appeal.

(2) Issue a proposed final allocation plan.

(f) In the proposed final allocation plan, the council of governments or delegate subregion, as applicable, shall adjust allocations to local governments based upon the results of the appeals process. If the adjustments total 7 percent or less of the regional housing need determined pursuant to Section 65584.01, or, as applicable, total 7 percent or less of the subregion's share of the regional housing need as determined pursuant to Section 65584.03, then the council of governments or delegate subregion, as applicable, shall distribute the adjustments proportionally to all local governments. If the adjustments total more than 7 percent of the regional housing need, then the council of governments or delegate subregion, as applicable, shall develop a methodology to distribute the amount greater than the 7 percent to local governments. The total distribution of housing need shall not equal less than the regional housing need, as determined pursuant to Section 65584.01, nor shall the subregional distribution of housing need equal less than its share of the regional housing need as determined pursuant to Section 65584.03.

(g) Within 45 days after the issuance of the proposed final allocation plan by the council of governments and each delegate subregion, as applicable, the council of

governments shall hold a public hearing to adopt a final allocation plan. To the extent that the final allocation plan fully allocates the regional share of statewide housing need, as determined pursuant to Section 65584.01 and has taken into account all appeals, the council of governments shall have final authority to determine the distribution of the region's existing and projected housing need as determined pursuant to Section 65584.01. The council of governments shall submit its final allocation plan to the department within three days of adoption. Within 30 days after the department's receipt of the final allocation plan adopted by the council of governments, the department shall determine if the final allocation plan is consistent with the existing and projected housing need for the region, as determined pursuant to Section 65584.01. The department may revise the determination of the council of governments if necessary to obtain this consistency.

(h) Any authority of the council of governments to review and revise the share of a city or county of the regional housing need under this section shall not constitute authority to revise, approve, or disapprove the manner in which the share of the city or county of the regional housing need is implemented through its housing program.

(i) Any time period in subdivision (d) or (e) may be extended by a council of governments or delegate subregion, as applicable, for up to 30 days.

(j) The San Diego Association of Governments may follow the process in this section for the draft and final allocation plan for the sixth revision of the housing element notwithstanding such actions being carried out before the adoption of an updated regional transportation plan and sustainable communities strategy.

(Amended by Stats. 2019, Ch. 634, Sec. 4. (AB 1730) Effective January 1, 2020.)

State of California

GOVERNMENT CODE

Section 65080

65080. (a) Each transportation planning agency designated under Section 29532 or 29532.1 shall prepare and adopt a regional transportation plan directed at achieving a coordinated and balanced regional transportation system, including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and services. The plan shall be action-oriented and pragmatic, considering both the short-term and long-term future, and shall present clear, concise policy guidance to local and state officials. The regional transportation plan shall consider factors specified in Section 134 of Title 23 of the United States Code. Each transportation planning agency shall consider and incorporate, as appropriate, the transportation plans of cities, counties, districts, private organizations, and state and federal agencies.

(b) The regional transportation plan shall be an internally consistent document and shall include all of the following:

(1) A policy element that describes the transportation issues in the region, identifies and quantifies regional needs, and describes the desired short-range and long-range transportation goals, and pragmatic objective and policy statements. The objective and policy statements shall be consistent with the funding estimates of the financial element. The policy element of transportation planning agencies with populations that exceed 200,000 persons may quantify a set of indicators including, but not limited to, all of the following:

(A) Measures of mobility and traffic congestion, including, but not limited to, daily vehicle hours of delay per capita and vehicle miles traveled per capita.

(B) Measures of road and bridge maintenance and rehabilitation needs, including, but not limited to, roadway pavement and bridge conditions.

(C) Measures of means of travel, including, but not limited to, percentage share of all trips (work and nonwork) made by all of the following:

(i) Single occupant vehicle.

(ii) Multiple occupant vehicle or carpool.

(iii) Public transit including commuter rail and intercity rail.

(iv) Walking.

(v) Bicycling.

(D) Measures of safety and security, including, but not limited to, total injuries and fatalities assigned to each of the modes set forth in subparagraph (C).

(E) Measures of equity and accessibility, including, but not limited to, percentage of the population served by frequent and reliable public transit, with a breakdown by

income bracket, and percentage of all jobs accessible by frequent and reliable public transit service, with a breakdown by income bracket.

(F) The requirements of this section may be met using existing sources of information. No additional traffic counts, household surveys, or other sources of data shall be required.

(2) A sustainable communities strategy prepared by each metropolitan planning organization as follows:

(A) No later than September 30, 2010, the State Air Resources Board shall provide each affected region with greenhouse gas emission reduction targets for the automobile and light truck sector for 2020 and 2035, respectively.

(i) No later than January 31, 2009, the state board shall appoint a Regional Targets Advisory Committee to recommend factors to be considered and methodologies to be used for setting greenhouse gas emission reduction targets for the affected regions. The committee shall be composed of representatives of the metropolitan planning organizations, affected air districts, the League of California Cities, the California State Association of Counties, local transportation agencies, and members of the public, including homebuilders, environmental organizations, planning organizations, environmental justice organizations, affordable housing organizations, and others. The advisory committee shall transmit a report with its recommendations to the state board no later than September 30, 2009. In recommending factors to be considered and methodologies to be used, the advisory committee may consider any relevant issues, including, but not limited to, data needs, modeling techniques, growth forecasts, the impacts of regional jobs-housing balance on interregional travel and greenhouse gas emissions, economic and demographic trends, the magnitude of greenhouse gas reduction benefits from a variety of land use and transportation strategies, and appropriate methods to describe regional targets and to monitor performance in attaining those targets. The state board shall consider the report before setting the targets.

(ii) Before setting the targets for a region, the state board shall exchange technical information with the metropolitan planning organization and the affected air district. The metropolitan planning organization may recommend a target for the region. The metropolitan planning organization shall hold at least one public workshop within the region after receipt of the report from the advisory committee. The state board shall release draft targets for each region no later than June 30, 2010.

(iii) In establishing these targets, the state board shall take into account greenhouse gas emission reductions that will be achieved by improved vehicle emission standards, changes in fuel composition, and other measures it has approved that will reduce greenhouse gas emissions in the affected regions, and prospective measures the state board plans to adopt to reduce greenhouse gas emissions from other greenhouse gas emission sources as that term is defined in subdivision (i) of Section 38505 of the Health and Safety Code and consistent with the regulations promulgated pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), including Section 38566 of the Health and Safety Code.

(iv) The state board shall update the regional greenhouse gas emission reduction targets every eight years consistent with each metropolitan planning organization's timeframe for updating its regional transportation plan under federal law until 2050. The state board may revise the targets every four years based on changes in the factors considered under clause (iii). The state board shall exchange technical information with the Department of Transportation, metropolitan planning organizations, local governments, and affected air districts and engage in a consultative process with public and private stakeholders, before updating these targets.

(v) The greenhouse gas emission reduction targets may be expressed in gross tons, tons per capita, tons per household, or in any other metric deemed appropriate by the state board.

(B) Each metropolitan planning organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to use the most recent planning assumptions considering local general plans and other factors. The sustainable communities strategy shall (i) identify the general location of uses, residential densities, and building intensities within the region, (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth, (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584, (iv) identify a transportation network to service the transportation needs of the region, (v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65080.01, (vi) consider the state housing goals specified in Sections 65580 and 65581, (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506).

(C) (i) Within the jurisdiction of the Metropolitan Transportation Commission, as defined by Section 66502, the Association of Bay Area Governments shall be responsible for clauses (i), (ii), (iii), (v), and (vi) of subparagraph (B); the Metropolitan Transportation Commission shall be responsible for clauses (iv) and (viii) of subparagraph (B); and the Association of Bay Area Governments and the Metropolitan Transportation Commission shall jointly be responsible for clause (vii) of subparagraph (B).

(ii) Within the jurisdiction of the Tahoe Regional Planning Agency, as defined in Sections 66800 and 66801, the Tahoe Metropolitan Planning Organization shall use the Regional Plan for the Lake Tahoe Region as the sustainable community strategy, provided that it complies with clauses (vii) and (viii) of subparagraph (B).

(D) In the region served by the Southern California Association of Governments, a subregional council of governments and the county transportation commission may work together to propose the sustainable communities strategy and an alternative planning strategy, if one is prepared pursuant to subparagraph (I), for that subregional area. The metropolitan planning organization may adopt a framework for a subregional sustainable communities strategy or a subregional alternative planning strategy to address the intraregional land use, transportation, economic, air quality, and climate policy relationships. The metropolitan planning organization shall include the subregional sustainable communities strategy for that subregion in the regional sustainable communities strategy to the extent consistent with this section and federal law and approve the subregional alternative planning strategy, if one is prepared pursuant to subparagraph (I), for that subregional area to the extent consistent with this section. The metropolitan planning organization shall develop overall guidelines, create public participation plans pursuant to subparagraph (F), ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.

(E) The metropolitan planning organization shall conduct at least two informational meetings in each county within the region for members of the board of supervisors and city councils on the sustainable communities strategy and alternative planning strategy, if any. The metropolitan planning organization may conduct only one informational meeting if it is attended by representatives of the county board of supervisors and city council members representing a majority of the cities representing a majority of the population in the incorporated areas of that county. Notice of the meeting or meetings shall be sent to the clerk of the board of supervisors and to each city clerk. The purpose of the meeting or meetings shall be to discuss the sustainable communities strategy and the alternative planning strategy, if any, including the key land use and planning assumptions to the members of the board of supervisors and the city council members in that county and to solicit and consider their input and recommendations.

(F) Each metropolitan planning organization shall adopt a public participation plan, for development of the sustainable communities strategy and an alternative planning strategy, if any, that includes all of the following:

(i) Outreach efforts to encourage the active participation of a broad range of stakeholder groups in the planning process, consistent with the agency's adopted Federal Public Participation Plan, including, but not limited to, affordable housing advocates, transportation advocates, neighborhood and community groups, environmental advocates, home builder representatives, broad-based business organizations, landowners, commercial property interests, and homeowner associations.

(ii) Consultation with congestion management agencies, transportation agencies, and transportation commissions.

(iii) Workshops throughout the region to provide the public with the information and tools necessary to provide a clear understanding of the issues and policy choices. At least one workshop shall be held in each county in the region. For counties with a population greater than 500,000, at least three workshops shall be held. Each

workshop, to the extent practicable, shall include urban simulation computer modeling to create visual representations of the sustainable communities strategy and the alternative planning strategy.

(iv) Preparation and circulation of a draft sustainable communities strategy and an alternative planning strategy, if one is prepared, not less than 55 days before adoption of a final regional transportation plan.

(v) At least three public hearings on the draft sustainable communities strategy in the regional transportation plan and alternative planning strategy, if one is prepared. If the metropolitan transportation organization consists of a single county, at least two public hearings shall be held. To the maximum extent feasible, the hearings shall be in different parts of the region to maximize the opportunity for participation by members of the public throughout the region.

(vi) A process for enabling members of the public to provide a single request to receive notices, information, and updates.

(G) In preparing a sustainable communities strategy, the metropolitan planning organization shall consider spheres of influence that have been adopted by the local agency formation commissions within its region.

(H) Before adopting a sustainable communities strategy, the metropolitan planning organization shall quantify the reduction in greenhouse gas emissions projected to be achieved by the sustainable communities strategy and set forth the difference, if any, between the amount of that reduction and the target for the region established by the state board.

(I) If the sustainable communities strategy, prepared in compliance with subparagraph (B) or (D), is unable to reduce greenhouse gas emissions to achieve the greenhouse gas emission reduction targets established by the state board, the metropolitan planning organization shall prepare an alternative planning strategy to the sustainable communities strategy showing how those greenhouse gas emission targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. The alternative planning strategy shall be a separate document from the regional transportation plan, but it may be adopted concurrently with the regional transportation plan. In preparing the alternative planning strategy, the metropolitan planning organization:

(i) Shall identify the principal impediments to achieving the targets within the sustainable communities strategy.

(ii) May include an alternative development pattern for the region pursuant to subparagraphs (B) to (G), inclusive.

(iii) Shall describe how the greenhouse gas emission reduction targets would be achieved by the alternative planning strategy, and why the development pattern, measures, and policies in the alternative planning strategy are the most practicable choices for achievement of the greenhouse gas emission reduction targets.

(iv) An alternative development pattern set forth in the alternative planning strategy shall comply with Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, except to the extent that compliance will prevent achievement of the greenhouse gas emission reduction targets approved by the state board.

(v) For purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code), an alternative planning strategy shall not constitute a land use plan, policy, or regulation, and the inconsistency of a project with an alternative planning strategy shall not be a consideration in determining whether a project may have an environmental effect.

(J) (i) Before starting the public participation process adopted pursuant to subparagraph (F), the metropolitan planning organization shall submit a description to the state board of the technical methodology it intends to use to estimate the greenhouse gas emissions from its sustainable communities strategy and, if appropriate, its alternative planning strategy. The state board shall respond to the metropolitan planning organization in a timely manner with written comments about the technical methodology, including specifically describing any aspects of that methodology it concludes will not yield accurate estimates of greenhouse gas emissions, and suggested remedies. The metropolitan planning organization is encouraged to work with the state board until the state board concludes that the technical methodology operates accurately.

(ii) After adoption, a metropolitan planning organization shall submit a sustainable communities strategy or an alternative planning strategy, if one has been adopted, to the state board for review, including the quantification of the greenhouse gas emission reductions the strategy would achieve and a description of the technical methodology used to obtain that result. Review by the state board shall be limited to acceptance or rejection of the metropolitan planning organization's determination that the strategy submitted would, if implemented, achieve the greenhouse gas emission reduction targets established by the state board. The state board shall complete its review within 60 days.

(iii) If the state board determines that the strategy submitted would not, if implemented, achieve the greenhouse gas emission reduction targets, the metropolitan planning organization shall revise its strategy or adopt an alternative planning strategy, if not previously adopted, and submit the strategy for review pursuant to clause (ii). At a minimum, the metropolitan planning organization must obtain state board acceptance that an alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established for that region by the state board.

(iv) On or before September 1, 2018, and every four years thereafter to align with target setting, notwithstanding Section 10231.5, the state board shall prepare a report that assesses progress made by each metropolitan planning organization in meeting the regional greenhouse gas emission reduction targets set by the state board. The report shall include changes to greenhouse gas emissions in each region and data-supported metrics for the strategies used to meet the targets. The report shall also include a discussion of best practices and the challenges faced by the metropolitan planning organizations in meeting the targets, including the effect of state policies and funding. The report shall be developed in consultation with the metropolitan planning organizations and affected stakeholders. The report shall be submitted to the Assembly Committee on Transportation and the Assembly Committee on Natural

Resources, and to the Senate Committee on Transportation, the Senate Committee on Housing, and the Senate Committee on Environmental Quality.

(K) Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land, nor, except as provided by subparagraph (J), shall either one be subject to any state approval. Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. Nothing in this section shall be interpreted to limit the state board's authority under any other law. Nothing in this section shall be interpreted to authorize the abrogation of any vested right whether created by statute or by common law. Nothing in this section shall require a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy. Nothing in this section requires a metropolitan planning organization to approve a sustainable communities strategy that would be inconsistent with Part 450 of Title 23 of, or Part 93 of Title 40 of, the Code of Federal Regulations and any administrative guidance under those regulations. Nothing in this section relieves a public or private entity or any person from compliance with any other local, state, or federal law.

(L) Nothing in this section requires projects programmed for funding on or before December 31, 2011, to be subject to the provisions of this paragraph if they (i) are contained in the 2007 or 2009 Federal Statewide Transportation Improvement Program, (ii) are funded pursuant to the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 (Chapter 12.49 (commencing with Section 8879.20) of Division 1 of Title 2), or (iii) were specifically listed in a ballot measure before December 31, 2008, approving a sales tax increase for transportation projects. Nothing in this section shall require a transportation sales tax authority to change the funding allocations approved by the voters for categories of transportation projects in a sales tax measure adopted before December 31, 2010. For purposes of this subparagraph, a transportation sales tax authority is a district, as defined in Section 7252 of the Revenue and Taxation Code, that is authorized to impose a sales tax for transportation purposes.

(M) A metropolitan planning organization, or a regional transportation planning agency not within a metropolitan planning organization, that is required to adopt a regional transportation plan not less than every five years, may elect to adopt the plan not less than every four years. This election shall be made by the board of directors of the metropolitan planning organization or regional transportation planning agency no later than June 1, 2009, or thereafter 54 months before the statutory deadline for the adoption of housing elements for the local jurisdictions within the region, after a public hearing at which comments are accepted from members of the public and representatives of cities and counties within the region covered by the metropolitan planning organization or regional transportation planning agency. Notice of the public hearing shall be given to the general public and by mail to cities and counties within the region no later than 30 days before the date of the public hearing. Notice of election shall be promptly given to the Department of Housing and Community Development. The metropolitan planning organization or the regional transportation planning agency

shall complete its next regional transportation plan within three years of the notice of election.

(N) Two or more of the metropolitan planning organizations for Fresno County, Kern County, Kings County, Madera County, Merced County, San Joaquin County, Stanislaus County, and Tulare County may work together to develop and adopt multiregional goals and policies that may address interregional land use, transportation, economic, air quality, and climate relationships. The participating metropolitan planning organizations may also develop a multiregional sustainable communities strategy, to the extent consistent with federal law, or an alternative planning strategy for adoption by the metropolitan planning organizations. Each participating metropolitan planning organization shall consider any adopted multiregional goals and policies in the development of a sustainable communities strategy and, if applicable, an alternative planning strategy for its region.

(3) An action element that describes the programs and actions necessary to implement the plan and assigns implementation responsibilities. The action element may describe all transportation projects proposed for development during the 20-year or greater life of the plan. The action element shall consider congestion management programming activities carried out within the region.

(4) (A) A financial element that summarizes the cost of plan implementation constrained by a realistic projection of available revenues. The financial element shall also contain recommendations for allocation of funds. A county transportation commission created pursuant to the County Transportation Commissions Act (Division 12 (commencing with Section 130000) of the Public Utilities Code) shall be responsible for recommending projects to be funded with regional improvement funds, if the project is consistent with the regional transportation plan. The first five years of the financial element shall be based on the five-year estimate of funds developed pursuant to Section 14524. The financial element may recommend the development of specified new sources of revenue, consistent with the policy element and action element.

(B) The financial element of transportation planning agencies with populations that exceed 200,000 persons may include a project cost breakdown for all projects proposed for development during the 20-year life of the plan that includes total expenditures and related percentages of total expenditures for all of the following:

- (i) State highway expansion.
- (ii) State highway rehabilitation, maintenance, and operations.
- (iii) Local road and street expansion.
- (iv) Local road and street rehabilitation, maintenance, and operation.
- (v) Mass transit, commuter rail, and intercity rail expansion.
- (vi) Mass transit, commuter rail, and intercity rail rehabilitation, maintenance, and operations.
- (vii) Pedestrian and bicycle facilities.
- (viii) Environmental enhancements and mitigation.
- (ix) Research and planning.
- (x) Other categories.

(C) The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall consider financial incentives for cities and counties that have resource areas or farmland, as defined in Section 65080.01, for the purposes of, for example, transportation investments for the preservation and safety of the city street or county road system and farm-to-market and interconnectivity transportation needs. The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall also consider financial assistance for counties to address countywide service responsibilities in counties that contribute toward the greenhouse gas emission reduction targets by implementing policies for growth to occur within their cities.

(c) Each transportation planning agency may also include other factors of local significance as an element of the regional transportation plan, including, but not limited to, issues of mobility for specific sectors of the community, including, but not limited to, senior citizens.

(d) (1) Except as otherwise provided in this subdivision, each transportation planning agency shall adopt and submit, every four years, an updated regional transportation plan to the California Transportation Commission and the Department of Transportation. A transportation planning agency located in a federally designated air quality attainment area or that does not contain an urbanized area may at its option adopt and submit a regional transportation plan every five years. When applicable, the plan shall be consistent with federal planning and programming requirements and shall conform to the regional transportation plan guidelines adopted by the California Transportation Commission. Before adoption of the regional transportation plan, a public hearing shall be held after the giving of notice of the hearing by publication in the affected county or counties pursuant to Section 6061.

(2) (A) Notwithstanding subdivisions (b) and (c), and paragraph (1), inclusive, the regional transportation plan, sustainable communities strategy, and environmental impact report adopted by the San Diego Association of Governments on October 9, 2015, shall remain in effect for all purposes, including for purposes of consistency determinations and funding eligibility for the San Diego Association of Governments and all other agencies relying on those documents, until the San Diego Association of Governments adopts its next update to its regional transportation plan.

(B) The San Diego Association of Governments shall adopt and submit its update to the 2015 regional transportation plan on or before December 31, 2021.

(C) After the update described in subparagraph (B), the time period for San Diego Association of Governments' updates to its regional transportation plan shall be reset and shall be adopted and submitted every four years.

(D) Notwithstanding clause (iv) of subparagraph (A) of paragraph (2) of subdivision (b), the State Air Resources Board shall not update the greenhouse gas emission reduction targets for the region within the jurisdiction of the San Diego Association of Governments before the adoption of the update to the regional transportation plan pursuant to subparagraph (B).

(E) The update to the regional transportation plan adopted by the San Diego Association of Governments on October 9, 2015, which will be prepared and submitted

to federal agencies for purposes of compliance with federal laws applicable to regional transportation plans and air quality conformity and which is due in October 2019, shall not be considered a regional transportation plan pursuant to this section and shall not constitute a project for purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

(F) In addition to meeting the other requirements to nominate a project for funding through the Solutions for Congested Corridors Program (Chapter 8.5 (commencing with Section 2390) of Division 3 of the Streets and Highways Code), the San Diego Association of Governments, until December 31, 2021, shall only nominate projects for funding through the Solutions for Congested Corridors Program that are consistent with the eligibility requirements for projects under any of the following programs:

(i) The Transit and Intercity Rail Capital Program (Part 2 (commencing with Section 75220) of Division 44 of the Public Resources Code).

(ii) The Low Carbon Transit Operations Program (Part 3 (commencing with Section 75230) of Division 44 of the Public Resources Code).

(iii) The Active Transportation Program (Chapter 8 (commencing with Section 2380) of Division 3 of the Streets and Highways Code).

(G) Commencing January 1, 2020, and every two years thereafter, the San Diego Association of Governments shall begin developing an implementation report that tracks the implementation of its most recently adopted sustainable communities strategy. The report shall discuss the status of the implementation of the strategy at the regional and local level, and any successes and barriers that have occurred since the last report. The San Diego Association of Governments shall submit the implementation report to the state board by including it in its sustainable communities strategy implementation review pursuant to clause (ii) of subparagraph (J) of paragraph (2) of subdivision (b).

(Amended by Stats. 2019, Ch. 634, Sec. 2. (AB 1730) Effective January 1, 2020.)

ADU Status

JURISDICTION	ADU ordinance revised to comply with new statutes?	If yes, urgency ordinance or updated ordinance? When? Timeline?
Aliso Viejo		
Anaheim		
Brea		
Buena Park		
Costa Mesa		
County of Orange		
Cypress		
Dana Point		
Fountain Valley		
Fullerton		
Garden Grove		
Huntington Beach		
Irvine		
La Habra		
La Palma		
Laguna Beach		
Laguna Hills		
Laguna Niguel		
Laguna Woods		
Lake Forest		
Los Alamitos		
Mission Viejo		
Newport Beach		
Orange		
Placentia		
Rancho Sta Margarita		
San Clemente		
San Juan Capistrano		
Santa Ana		
Seal Beach		
Stanton		
Tustin		
Villa Park		
Westminster		
Yorba Linda		



Item 7: Local Early Action Planning (LEAP) Grants
Recommended Action: Discussion.

Reports

The California Department of Housing and Community Development (HCD) has released a Notice of Funding Availability (NOFA) for approximately \$119,040,000 as part of the Local Early Action Planning Grants Program (LEAP or Program). LEAP is made available as a portion of the Local Government Planning Support Grants Program pursuant to Chapter 3.1 of Health and Safety Code (Sections 50515.03 (Chapter 159, Statutes of 2019)). The Program provides funding to jurisdictions for the preparation and adoption of planning documents, process improvements that accelerate housing production, and facilitate compliance in implementing the sixth cycle of the RHNA. More information can be found in the attachment.

Attachment: Local Early Action Planning (LEAP) Grants Program 2020 Notice of Funding Availability

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF FINANCIAL ASSISTANCE**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2771 / FAX (916) 263-2763
www.hcd.ca.gov



January 27, 2020

MEMORANDUM FOR: All Potential Applicants

**FROM: Zachary Olmstead, Deputy Director
Division of Housing Policy Development**

**SUBJECT: NOTICE OF FUNDING AVAILABILITY -
LOCAL EARLY ACTION PLANNING GRANTS PROGRAM**

The California Department of Housing and Community Development (Department) is pleased to announce the release of this Notice of Funding Availability (NOFA) for approximately \$119,040,000 as part of the Local Early Action Planning Grants Program (LEAP or Program). LEAP is made available as a portion of the Local Government Planning Support Grants Program pursuant to Chapter 3.1 of Health and Safety Code (Sections 50515 to 50515.05) (Chapter 159, Statutes of 2019). LEAP provides funding to jurisdictions for the preparation and adoption of planning documents, process improvements that accelerate housing production, and facilitate compliance in implementing the sixth cycle of the regional housing need assessment (RHNA).

In order to be eligible for grant funding, an applicant must submit a completed, signed original application and an electronic copy on CD or USB flash drive. Applications will be accepted on an Over-the-Counter (OTC) basis as of the date of this NOFA through July 1, 2020. The Department encourages early applications and will accept applications post-marked by the July 1, 2020 deadline. Applicants may utilize various carrier services, such as the U.S. Postal Service, UPS, FedEx, or other carrier services. All applications must be submitted to the Department at the following address:

**California Department of Housing and Community Development
Division of Housing Policy Development
2020 West El Camino Ave, Suite 500
Sacramento, CA 95833**

Program applications, forms and instructions are available on the Department's website at <https://www.hcd.ca.gov/grants-funding/active-funding/leap.shtml>. If you have questions regarding this NOFA, please email the Department at EarlyActionPlanning@hcd.ca.gov.

Attachment

**LOCAL EARLY ACTION PLANNING GRANTS PROGRAM
(LEAP)
2020 NOTICE OF FUNDING AVAILABILITY**



**State of California
Governor Gavin Newsom**

**Alexis Podesta, Secretary
Business, Consumer Services and Housing Agency**

**Douglas R. McCauley, Acting Director
California Department of Housing and Community Development**

**Zachary Olmstead, Deputy Director
California Department of Housing and Community Development
Division of Housing Policy Development**

2020 West El Camino Avenue, Suite 500
Sacramento, CA 95833
Telephone: (916) 263-2911

Website: <https://www.hcd.ca.gov/grants-funding/active-funding/leap.shtml>

Email: EarlyActionPlanning@hcd.ca.gov

January 27, 2020

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2019 NOTICE OF FUNDING AVAILABILITY LOCAL EARLY ACTION PLANNING GRANTS PROGRAM

I. Introduction

The California Department of Housing and Community Development (Department) is pleased to announce the release of this Notice of Funding Availability (NOFA) for approximately \$119,040,000 as part of the Local Early Action Planning Grants Program (LEAP or Program). LEAP is made available as a portion of the Local Government Planning Support Grants Program pursuant to Chapter 3.1 of Health and Safety Code (Sections 50515.03 (Chapter 159, Statutes of 2019)). The Program provides funding to jurisdictions for the preparation and adoption of planning documents, process improvements that accelerate housing production, and facilitate compliance in implementing the sixth cycle of the RHNA.

II. Authority and Scope

This NOFA is authorized pursuant to Chapter 3.1 of Health and Safety Code (Sections 50515 to 50515.05). The NOFA implements, interprets, and makes specific provisions for purposes of implementing planning grants to jurisdictions pursuant to 50515.03 (hereinafter “LEAP”).

This NOFA establishes terms, conditions, forms, procedures and other mechanisms as the Department deems necessary to exercise the powers and perform the duties conferred by Chapter 3.1.

The matters set forth herein are regulatory mandates, and are adopted in accordance with the authorities set forth below:

Quasi-legislative regulations ... have the dignity of statutes ... [and]... delegation of legislative authority includes the power to elaborate the meaning of key statutory terms...

Ramirez v. Yosemite Water Co., 20 Cal. 4th 785, 800 (1999)

Further, the Department may implement the Program through the issuance of forms, guidelines, and one or more NOFAs, as the Department deems necessary, to exercise the powers and perform the duties conferred on it by this chapter. Any forms, guidelines, and notices of funding availability adopted pursuant to this section are hereby exempted from the rulemaking provisions of the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code). (Health and Safety Code Section 50515.04(f)).

The Department reserves the right, at its sole discretion, to suspend or amend the provisions of this NOFA, including, but not limited to, grant award amounts.

III. Program Summary

The Local Early Action Planning Grants Program (LEAP or Program) is part of the broader Program formerly known as the Local Government Planning Support Grants Program, which was established as part of the 2019-20 Budget Act. The 2019-20 Budget Act provides a spectrum of support, incentives, resources and accountability to meet California’s housing goals. Some specific elements include:

- Planning Support (local and regional planning grants)
- Incentives (Prohousing preference and infill incentive grants)
- Funding Resources
- Accountability (penalties for noncompliant housing plans)
- Reform (collaborative processes to reform regional housing needs)

The Local Government Planning Support Grants Program provides one-time grant funding to regions and jurisdictions for technical assistance, preparation and adoption of planning documents, and process improvements. The over-arching goals of the Program are to (1) accelerate housing production; and (2) facilitate compliance to implement the sixth cycle of the regional housing need assessment (RHNA).

IV. Program Timeline

Grants will be available to eligible applicants on a noncompetitive, Over-the-Counter (OTC) basis. Applications will be accepted from the date of the release of this NOFA and up until July 1, 2020. See Table 1 below for the anticipated timeline for awards for the OTC period.

Event	Date
NOFA Release	January 27, 2020
NOFA Application Webinar	February 14, 2020
NOFA Application Workshops	February and March 2020
Final Due Date for OTC Applications	July 1, 2020
Technical Assistance	February 2020 through December 31, 2023
Expenditure Deadline	December 31, 2023

The Department will review applications within 30 days and target award of applications within 60 days, with subsequent Standard Agreements processed within 60 days of award. Applicants are encouraged to submit early in the application window.

The Department will hold workshops and a webinar to review the LEAP NOFA and application and will be conducting technical assistance to aid applicants throughout the OTC period and implementation of the grant. For a list of dates, times, and locations for the workshops as well as information on technical assistance, please visit the Department’s website at <https://www.hcd.ca.gov/grants-funding/active-funding/leap.shtml>.

V. Award Amounts

This Program will make \$119,040,000 dollars available to jurisdictions for Program implementation, including state operations and expenditures, and technical assistance. Maximum award amounts are based on population estimates as of January 1, 2019.¹ The minimum award amount is \$25,000. The maximum amount that a jurisdiction may receive pursuant to this subdivision shall be as follows:

Jurisdiction Size (in population)	Maximum Award Amount
750,000 or greater	\$1,500,000
300,000 to 749,999	\$750,000
100,000 to 299,999	\$500,000
60,000 to 99,999	\$300,000
20,000 to 59,999	\$150,000
Less than 20,000	\$65,000

Applicants seeking partnerships with other local governments will be additive. For example, two jurisdictions between 100,000 and 299,999 people could submit a proposal for up to \$1.0 million.

VI. Eligible Applicants

Eligible applicants are limited to local governments, i.e., cities and counties. However, local governments may partner through legally binding agreements with other forms of governments or entities where the proposal will have a direct effect

¹ Population estimates, posted as of January 1, 2019, are based on the Department of Finance E-1 report. Official maximum amounts per jurisdiction can be found at the Department’s website at <https://www.hcd.ca.gov/grants-funding/active-funding/leap.shtml>.

on land-use or development within the participating localities. This includes, but is not limited to, partnerships with other localities, regional governments, housing authorities, school districts, special districts, community-based organizations, or any duly constituted governing body of an Indian Reservation or Rancheria. Applicants forming partnerships, must submit separate, completed and signed application packages, including resolutions and a copy of the signed agreement between partners to the Department in order to be awarded funds.

VII. Eligible Activities

Eligible activities must demonstrate an increase in housing related planning activities and facilitate accelerated housing production. Eligible activities may be part of a larger planning effort (e.g., a comprehensive zoning code update) if proposed activities have not been completed prior to the NOFA date, are distinct, and demonstrate a nexus to accelerating housing production. Eligible activities are not necessarily jurisdiction-wide and may include a smaller geography with a significant impact on housing production. For example, eligible activities may include a housing development-related project with a significant community level impact, or planning or process improvement for a project with an ongoing community impact beyond the project. Eligible activities may include a variety of planning documents and processes, including, but not limited to, the following as set forth in Health and Safety Code section 50515.03(c):

1. Rezoning and encouraging development by updating planning documents and zoning ordinances, such as General Plans, community plans, specific plans, implementation of sustainable communities' strategies, and local coastal programs;
2. Completing environmental clearance to eliminate the need for project-specific review;
3. Establishing housing incentive zones or other area-based housing incentives beyond State Density Bonus Law such as a workforce housing opportunity zone pursuant to Article 10.10 (commencing with Section 65620) of Chapter 3 of Division 1 of Title 7 of the Government Code, or a housing sustainability district pursuant to Chapter 11 (commencing with Section 66200) of Division 1 of Title 7 of the Government Code;
4. Performing infrastructure planning, including for sewers, water systems, transit, roads, or other public facilities necessary to support new housing and new residents;
5. Planning documents to promote development of publicly-owned land, such as partnering with other local entities to identify and prepare excess or surplus property for residential development;
6. Revamping local planning processes to speed up housing production;
7. Developing or improving an accessory dwelling unit ordinance in compliance with Section 65852.2 of the Government Code;
8. Planning documents for a smaller geography (less than jurisdiction-wide) with a significant impact on housing production, including an overlay district, project level specific plan, or development standards modifications proposed for significant areas of a locality, such as corridors, downtown or priority growth areas;

9. Rezoning to meet requirements pursuant to Gov. Code Section 65583(c)(1), and other rezoning efforts to comply with Housing Element requirements, including Gov. Code Section 65583.2(c) (AB 1397, Statutes of 2018);
10. Upzoning or other implementation measures to intensify land use patterns in strategic locations, such as close proximity to transit, jobs or other amenities;
11. Rezoning for multifamily housing in high resource areas (according to Tax Credit Allocation Committee/Housing Community Development Opportunity Area Maps);
12. Establishing pre-approved architectural and site plans;
13. Preparing and adopting Housing Elements of the General Plan that include an implementation component to facilitate compliance with the sixth cycle RHNA;
14. Adopting planning documents to coordinate with suballocations under Regional Early Action Planning Grants (REAP) pursuant to Health and Safety Code Section 50515.02(f) that accommodate the development of housing and infrastructure, and accelerate housing production in a way that aligns with state planning priorities, housing, transportation equity and climate goals, including hazard mitigation or climate adaptation;
15. Zoning for by-right supportive housing, pursuant to Gov. Code section 65651 (Chapter 753, Statutes of 2018);
16. Zoning incentives for housing for persons with special needs, including persons with developmental disabilities;
17. Planning documents related to carrying out a local or regional housing trust fund;
18. Environmental hazard assessments; data collection on permit tracking; feasibility studies, site analysis, or other background studies that are ancillary (e.g., less than 15 percent of the total grant amount) and part of a proposed activity with a nexus to accelerating housing production; and
19. Other planning documents or process improvements that demonstrate an increase in housing related planning activities and facilitate accelerating housing production; and
20. Establishing Prohousing Policies, as follows:

Prohousing Policies

The Department encourages applicants to consider LEAP funds to facilitate designation as a Prohousing jurisdiction.

The 2019-20 Budget Act requires the Department to develop the Prohousing designation emergency regulations by no later than July 1, 2021. This program will allow the Department to designate jurisdictions as “Prohousing,” when they demonstrate policies and strategies to accelerate housing production. In turn, Prohousing jurisdictions will be awarded additional points or preference in programs such as the Affordable Housing and Sustainable Communities (AHSC), Transformative Climate Communities (TCC), Infill Infrastructure Grant (IIG) programs and other state funding programs. The Department anticipates developing emergency regulations and Prohousing designations prior to July 1, 2021, and will seek to designate jurisdictions prior to future rounds of AHSC, TCC and IIG

programs.

Pursuant to Gov. Code Section 65589.9(f)(2), “Prohousing” policies mean policies that facilitate the planning, approval, or construction of housing. These policies may include, but are not limited to, the following:

- A. Planning for local financial incentives for housing, including, but not limited to, establishing a local housing trust fund;
- B. Reducing parking requirements for sites that are zoned for residential development;
- C. Adoption of zoning allowing for use by right for residential and mixed-use development;
- D. Zoning more sites for residential development or zoning sites at higher densities than is required to accommodate the minimum existing RHNA for the current Housing Element cycle;
- E. Adoption of accessory dwelling unit ordinances or other mechanisms that reduce barriers for property owners to create accessory dwelling units beyond the requirements outlined in Section 65852.2, as determined by the Department;
- F. Process improvements that reduce permit processing time;
- G. Creating of objective development standards;
- H. Studies and implementing actions that reduce development impact fees; and
- I. Establishing a Workforce Housing Opportunity Zone, as defined in Section 65620, or a housing sustainability district, as defined in Section 66200.”

VIII. Ineligible Activities

- 1. Activities unrelated to preparation and adoption of planning documents, and process improvements to accelerate housing production and facilitate compliance to implement the sixth cycle of the RHNA;
- 2. Activities that obstruct or hinder housing production, e.g., moratoriums, downzoning, planning documents with conditional use permits that significantly impact supply, cost, approval certainty and timing, planned development, or other similarly constraining processes; and
- 3. Project specific planning documents that do not have a significant impact on accelerating housing production or significant community level or re-occurring benefit beyond the project.
- 4. The Department may consider proposals that are combined with larger proposals that have a positive housing component and the net effect on accelerating housing production is significant. For example, an applicant may propose combining an open-space designation, downzoning, or anti-displacement measures with by-right upzoning that has a significant net gain in housing capacity.

IX. Eligible Uses

1. Grant funds may cover the costs of temporary staffing or consultant needs associated with eligible activities;
2. Grant funds shall be used for the costs of preparing and adopting the proposed activity;
3. A jurisdiction that receives funds under this Program may use a subcontractor. The subcontract shall provide for compliance with all the requirements of the Program. The subcontract shall not relieve the jurisdiction of its responsibilities under the Program;
4. Eligible expenditures may be incurred and expended for the project(s) subject to the terms and conditions of the Standard Agreement; and
5. Only approved and eligible costs incurred for work after the NOFA date, continued past the date of the Standard Agreement, and completed during the grant term, will be reimbursable.

X. Ineligible Uses

1. Program grant funds may not be used for administrative costs of persons employed by the grantee for activities not directly related to the preparation and adoption of the proposed activity;
2. No more than 5 percent of the grant amount may be used for administrative costs for any proposed use, to be approved by the Department upon disbursement; and
3. Approved and eligible costs incurred prior to the NOFA date are ineligible.

XI. Application Requirements

Until July 1, 2020, a jurisdiction may request an allocation of funds pursuant to this section by submitting a complete application to the Department that demonstrates:

1. A budget, including timelines, deliverables, sub-steps and adoption, that demonstrates funds will be utilized for eligible activities and uses;
2. How proposed activities will increase housing planning and facilitate accelerating local housing production;
3. Completed or proposed activities consistent with the state or other planning priorities; and
4. All other required information contained in the Department's application

Applicants will demonstrate consistency with these requirements utilizing the forms and manner prescribed in the Department application.

Accelerating Housing Production: Applicants must propose and document plans or processes that increase housing planning and facilitate accelerating local housing production. The application must demonstrate a significant positive effect on accelerating housing production through timing, cost, approval certainty, entitlement streamlining, feasibility, infrastructure capacity, or impact on housing

supply and affordability. An application must include an explanation and documentation of the nexus to accelerating housing production based on a reasonable and verifiable methodology and must utilize the Department's form (see the Department's application). A verifiable methodology may include a statement of support from a non-profit or for-profit developer that is active in the locality.

State and Other Planning Priorities: Consistency with state or other planning priorities may be demonstrated through proposed activities in the application **OR** activities that were completed within the last five years. Applicants must self-certify utilizing the Department's form (see Department's application).

XII. Application Submission Requirements

In order to be eligible for grant funding, an applicant must submit a completed, signed original application and an electronic copy on CD or USB flash drive. Applications will be accepted on an OTC basis as of the date of this NOFA through July 1, 2020. The Department encourages early applications and will accept applications post-marked by the July 1, 2020 deadline. Applicants may utilize various carrier services, such as the U.S. Postal Service, UPS, FedEx, or other carrier services. All applications must be submitted to the Department at the following address:

**California Department of Housing and Community Development
Division of Housing Policy Development
2020 West El Camino Ave, Suite 500
Sacramento, CA 95833**

Applications must be on Department forms and cannot be altered or modified by the applicant. Program applications and forms are available on the Department's website located at <https://www.hcd.ca.gov/grants-funding/active-funding/leap.shtml>.

XIII. Application Review

1. The Program will not utilize a competitive process to award funds.
2. Funds will be available to eligible applicants on a rolling OTC basis that begins as of the date of this NOFA and ends July 1, 2020.
3. An application form will be available upon release of the NOFA and will include forms to demonstrate meeting eligibility requirements such as, among other forms, a resolution, a proposed budget and timeline table and self-certified attachments demonstrating a nexus to housing production and consistency with state planning and other priorities;
4. Applications will first be reviewed for, among other things, completeness, eligibility requirements, and accuracy;
5. In order to be considered complete, an application must contain requested

- information and supporting documentation where appropriate;
6. All applications must meet the eligibility requirements as specified in this NOFA;
 7. If the application is ineligible, it will not be considered for funding, but may be amended and resubmitted;
 8. The Department may request additional information to complete and approve the application for funding;
 9. Applications recommended for funding are subject to conditions specified by the Department;
 10. Applications will be reviewed within 30 days from the date the Department receives the application; and
 11. All applicants not meeting the eligibility requirements will be informed within 30 days from the date the Department receives the application.

XIV. Award Letter and Standard Agreement

Successful applicants will receive an Award Letter from the Department and will be awarded funds. Applicants will enter into a state Standard Agreement (Standard Agreement) for distribution of funds. The Standard Agreement process will specify, among other things, the amount of funds granted, timeline for expenditure of funds, and the approved use of funds. Expenditure report dates and other requirements will also be identified in the Standard Agreement.

XV. Appeals

1. Basis of Appeals:
 - A. Upon receipt of the Department's notice deeming an application incomplete or ineligible, applicants under this NOFA may appeal such decision(s) to the Department Director.
 - B. The decision of the Director is final and not subject to further administrative or judicial review.
 - C. No applicant shall have the right to appeal a decision of the Department relating to another applicant's eligibility, award, denial of award, or any other related matter.
2. Appeals Process and Deadlines:
 - A. Process. In order to lodge an appeal, applicants must submit to the Director by the deadline set forth in subsection (b) below, a written appeal which states all relevant facts, arguments, and evidence upon which the appeal is based. No new or additional information will be accepted. Once the written appeal is submitted to the Director, no further information or materials is required to be accepted or considered thereafter. Appeals are to be submitted to the Director at following address:

California Department of Housing and Community Development
Division of Housing Policy Development
2020 W. El Camino Avenue, Suite 500
Sacramento, California 95833
EarlyActionPlanning@hcd.ca.gov

The Director will accept appeals delivered through a carrier service such as the U.S. Postal Service, UPS, Fed-Ex, or other carrier services that provide date stamp verification of delivery. Deliveries must be received during the Department's weekday (non-state holiday) business hours of 9:00 a.m. to 5:00 p.m. Pacific Standard Time. Additionally, emails to the email address listed above will be accepted if the email time stamp is prior to the appeal deadline.

B. Filing Deadline. Appeals must be received by the Director no later than (5) five business days from the date of the Department's determination.

3. Decision:

Any request to amend the Department's decision shall be reviewed for compliance with this NOFA and its application. The Director shall render his/her decision in writing within fifteen (15) business days of receipt of the applicant's written appeal. The decision of the Director shall be the Department's final decision, and shall not be appealable to any court or tribunal.

XVI. Administration

1. Grant Execution and Term

- A. The Department will notify the grantee if they have been selected for a grant award;
- B. After the Standard Agreement has been drawn, the grantee will be provided instructions for signing all required documents. The grantee must submit all supporting materials and a signed Standard Agreement within the timeline provided in the instructions, or risk forfeiting the grant award;
- C. The grant term begins on the day the Department and the grantee have fully executed the Standard Agreement. The Department will notify the grantee and partners when work may proceed under the agreement. However, eligible activities that are approved by the Department may be retroactively reimbursed to the date of the NOFA; and
- D. The end of the grant term will be determined by the state based on the availability of grant funds and the administrative requirements for liquidation.

2. Payment and Accounting of Grant Funds

- A. Grant funds cannot be disbursed until the Standard Agreement has been fully executed;
- B. The grantee will be responsible for compiling and submitting all invoices and reporting documents. Grantees will submit for reimbursements to the Department based on actual cost incurred;
- C. The grantee must bill the state based on clear deliverables outlined in the Standard Agreement or budget timeline. Only approved and eligible costs incurred for work after the NOFA date, continued past the date of the Standard Agreement, and completed and processed prior to the expenditure deadline, will be reimbursable. Approved and eligible costs incurred prior to the NOFA date are ineligible;
- D. Work must be completed prior to requesting reimbursement;
- E. Grant fund payment will be made on a reimbursement basis; advance payments are not allowed. The grantee and partners must have adequate cash flow to pay all grant-related expenses prior to requesting reimbursement from the Department. Project invoices will be submitted to the Department by the grantee on a quarterly basis;
- F. In unusual circumstances, the Department may consider alternative arrangements to reimbursement and payment methods based on documentation demonstrating cost burdens, including the inability to pay for work;
- G. Supporting documentation may include, but is not limited to: receipts, progress payments, subcontractor invoices, time cards, etc.;
- H. Invoices must be accompanied by reporting materials where appropriate. Invoices without the appropriate reporting materials will not be paid. The Department may withhold 10 percent of the grant until grant terms have been fulfilled; and
- I. Each recipient of funds under the Program shall expend those funds no later than December 31, 2023.

3. Accounting Records and Audits

- A. The grantee must establish a separate ledger account for receipts and expenditures of grant funds and maintain expenditure details in accordance with the budget and timeline. Separate bank accounts are not required;
- B. The grantee shall maintain documentation of its normal procurement policy and competitive bid process (including the use of sole source purchasing), and financial records of expenditures incurred during the course of the project, in accordance with generally accepted accounting principles;
- C. The grantee agrees that the state or designated representative shall have the right to review and to copy any records and supporting documentation pertaining to the performance of the Standard Agreement;
- D. The grantee agrees to maintain such records for possible audit for a minimum of three (3) years after final payment, unless a longer period of records retention is stipulated;
- E. Subcontractors employed by the grantee and paid with moneys under the

terms of this Standard Agreement shall be responsible for maintaining accounting records as specified above;

- F. At any time during the term of the Standard Agreement, the Department may perform, or cause to be performed, a financial audit of any and all phases of the award. At the Department's request, the awardee shall provide, at its own expense, a financial audit prepared by a certified public accountant. The State of California has the right to review project documents and conduct audits during project implementation and over the project life;
- G. The Department may request additional information, as needed, to meet other applicable audit requirements; and
- H. The Department may monitor expenditures and activities of an applicant, as the Department deems necessary, to ensure compliance with Program requirements.

4. Remedies of Nonperformance

- A. In the event that it is determined, at the sole discretion of the state, that the grantee is not meeting the terms and conditions of the Standard Agreement, immediately upon receiving a written notice from the Department to stop work, the grantee shall cease all work under the Standard Agreement. The Department has the sole discretion to determine that the grantee meets the terms and conditions after a stop work order, and to deliver a written notice to the grantee to resume work under the Standard Agreement;
- B. Both the grantee and the Department have the right to terminate the Standard Agreement at any time upon 30 days written notice. The notice shall specify the reason for early termination and may permit the grantee or the Department to rectify any deficiency(ies) prior to the early termination date. The grantee will submit any requested documents to the Department within 30 days of the early termination notice; and
- C. There must be a strong implementation component for the funded activity through this Program, including, where appropriate, agreement by the locality to formally adopt the completed planning document. Localities that do not formally adopt the funded activity could be subject to repayment of the grant.
- D. The Department may, as it deems appropriate or necessary, request the repayment of funds from an applicant, or pursue any other remedies available to it by law for failure to comply with Program requirements (Health and Safety Code section 50515.04(e)).

5. Reporting

- A. At any time during the term of the Standard Agreement, the Department may request a performance report that demonstrates satisfaction of all requirements identified in the Standard Agreement with emphasis on eligible activities, eligible uses, ineligible uses, and expenditures, according to timelines and budgets referenced in the Standard Agreement;
- B. Awardees shall submit a report, in the form and manner prescribed by

the Department, to be made publicly available on its internet website, by April 1 of the year following the receipt of those funds, and annually thereafter until those funds are expended, that contains the following information:

- The status of the proposed uses listed in the entity’s application for funding and the corresponding impact on housing within the region or jurisdiction; and
 - A summary of building permits, certificates of occupancy, or other completed entitlements issued by entities within the region, or by the jurisdiction, as applicable.
- C. The awardee must, in lieu of a separate report, provide the above described information as part of its annual report pursuant to Gov. Code Section 65400;
- D. The Department may request additional information, as needed, to meet other applicable reporting requirements;
- E. Upon completion of all deliverables within the Standard Agreement, the awardee shall submit a close out report. See Attachment 1; and
- F. The Department shall maintain records of the following and provide that information publicly on its internet website:
- The name of each applicant for Program funds and the status of that entity’s application;
 - The number of applications for Program funding received by the Department; and
 - The information described in 5(B) above for each recipient of Program funds.

XVII. Right to Modify or Suspend the NOFA, and Final Decision-making

The Department reserves the right, at its sole discretion, to suspend, amend, or modify the provisions of this NOFA at any time, including, without limitation, the amount of funds available hereunder. If such an action occurs, the Department will notify all interested parties and will post the revisions to the Department’s website. You may subscribe to the Department’s email list here: http://www.hcd.ca.gov/HCD_SSI/subscribe-form.html.

Further, the Department’s decision to approve or deny an application or request for funding pursuant to the Program, and its determination of the amount of funding to be provided, shall be final.

XVIII. Definitions

All terms not defined below shall, unless their context suggests otherwise, be interpreted in accordance with the meanings of terms described in Health and Safety Code section 50470.

- A. “Accelerating Housing Production” means improving the timing, cost, feasibility, approval and amount of development through various mechanisms such as zoning incentives (e.g., increased density and heights, reduced parking requirements), upzoning, zoning amendments to permit residential in non-residential zones, corridor planning, development standards modifications, non-discretionary review, financing strategies, sliding scale fee modifications, facilitating adequate infrastructure to support development, approval streamlining that addresses quickness and ease of entitlements, and other mechanisms that promote production or remove or mitigate regulatory barriers.
- B. “Affordability” means a housing unit that satisfies at least one of the following criteria:
 - 1. It is available at an “affordable rent” as that term is used and defined in Section 50053 of the Health & Safety Code;
 - 2. It is offered at an “affordable housing cost”, as that term is used and defined in Section 50052.5 of the Health & Safety Code; or
 - 3. It is available at an “affordable rent” or an “affordable housing cost” according to the alternative percentages of income for agency-assisted rental and cooperative housing developments pursuant to Department regulations adopted under Health and Safety Code section 50462(f).
- C. “Annual Progress Report” (APR) means the annual report required to be submitted to the Department pursuant to paragraph (2) of subdivision (a) of Section 65400 of the Government Code.
- D. “Completed entitlement” means a housing development project that has received all the required land use approvals or entitlements necessary for the issuance of a building permit and for which no additional action, including environmental review or appeals, is required to be eligible to apply for and obtain a building permit.
- E. “Council of governments” means a single or multicounty council created by a joint powers agreement pursuant to Chapter 5 (commencing with Section 6500) of Division 7 of Title 1 of the Government Code that is responsible for allocating regional housing need pursuant to Sections 65584, 65584.04, and 65584.05 of the Government Code.
- F. “Department” means the California Department of Housing and Community Development.

G. "Housing" means any development that satisfies both of the following criteria:

1. At least two-thirds of the square footage of the development must be designated for residential use; and
2. Includes a house, an apartment, a mobile home or trailer, a group of rooms, or a single room that is occupied as separate living quarters, or, if vacant, is intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building, and which have a direct access from the outside of the building, or through a common hall.

Note: accessory dwelling units (ADU) and junior accessory dwelling units (JADU) pursuant to Gov. Code sections 65852.2 and 65852.22 meet the definition above.

H. "Housing Element" or "element" means the Housing Element of a community's General Plan, as required pursuant to subdivision (c) of Section 65302 of the Government Code and prepared in accordance with Article 10.6 (commencing with Section 65580) of Chapter 3 of Division 1 of Title 7 of the Government Code.

I. "Jurisdiction" means any city, including a charter city, county, including a charter county or city and county, including a charter city and county.

J. "Local government" or "Locality" means any city, including a charter city, county, including a charter county or city and county, including a charter city and county.

K. "Objective zoning standard", "objective subdivision standard", and "objective design review standard" means standards that involve no personal or subjective judgment by a public official, and are uniformly verifiable by reference to an external and uniform benchmark or criterion available, and knowable by both the development applicant or proponent and the public official prior to submittal. "Objective design review standards" means only objective design standards published and adopted by ordinance or resolution by a local jurisdiction before submission of a development application, which are broadly applicable to development within the jurisdiction.

L. "Other Planning Priorities" means planning, policies, programs or investments to promote housing choices and affordability to lower and moderate income households, the encouragement of conservation of the existing affordable housing stock, and efforts to take into account current and future impacts of climate change, including hazard mitigation.

M. "Regional housing need assessment" means the existing and projected need for housing for each region, as determined by the Department pursuant to Section 65584.01 of the Government Code.

- N. “State Planning Priorities” means priorities which are intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety in the state, including in urban, suburban, and rural communities pursuant to Gov. Code Section 65041.1.

- O. “Streamlined Housing Production” means improving the entitlement process through actions such as removing, mitigating or minimizing local regulatory requirements, reforming the local approval process to reduce processing times, the number of local discretionary approvals and permits needed for projects, improving approval certainty, establishing non-discretionary processes, modifying development standards, such as reducing parking requirements and increasing height limits, or other efforts, such as taking the fullest advantage of existing streamlining mechanisms provided in state law.

Attachment 1
Close Out Reporting Form

LEAP Grant Close Out Reporting Template

Brief Summary

- Overview of the project
- Project start date and duration
- Project goals and relevance to LEAP goals
- Quantified outcomes

Lead Agency and Partnerships

- List lead agency and partnerships (including names, titles, organizations, and roles and responsibilities of each)
- What did those collaborative relationships and processes look like?

Drivers

- Did any local, state, or federal legislation or mandates drive the project? (SB 35, AB 1397, etc.)
- Was it a community driven effort?
- Were there additional funding opportunities present?

Engagement Process

- Who were your stakeholders?
- What did the engagement process look like?
- What role did stakeholders play in the process? (Keep in mind: training, education, council formation, technical assistance, etc.)
- What were the outcomes of the engagement process?

Challenges

- What challenges were encountered?
- What solutions were encountered or created?
- Are there areas for improvement of policy alignment at the state or federal level to help achieve this project more easily?

LEAP Grant Close Out Reporting Template

Outcomes

- What are the current or projected outcomes? Benefits?
- Were outcomes as anticipated?
- Have new opportunities arisen as a result of this project?
- What are the next steps?

Replicability

- What aspects of the project could be replicated in other communities?
- Useful resources and tools? For a specific region or sector?

Additional Resources

- Links to the project itself
- Links to resources used throughout and any other relevant resources

Further Information

- Who can be reached to ask more questions about this project?
- Name
- Number and/or email