

Meeting Date / Location

Tuesday, January 9, 2024
9:30 A.M. – 12:00 P.M.

Meeting Link:

https://teams.microsoft.com/join/19%3ameeting_NmY4N2FmNTQtODk4MC00ZGIzLWEyYzItNjU2ODZmMDNiMmI2%40thead.v2/0?context=%7b%22Tid%22%3a%2247feb367-af81-4519-94d7-caab1dfa1872%22%2c%22Oid%22%3a%22a2e04a02-2df2-4f7f-8724-377325b47e13%22%7d

Or call in (audio only)

+1 949-522-6403,,650103999# United States, Irvine
Phone Conference ID: 650 103 999#

Agenda Item

Staff

Page

INTRODUCTIONS

(Chair Equina, City of Irvine)

Note: Please enter your name and agency in the chat box

PUBLIC COMMENTS

(Chair Equina)

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 Equina) TAC 3

Draft OCCOG TAC minutes for the December 5, 2023 meeting

Recommended Action: Approve OCCOG TAC minutes for the December 5, 2023 meeting as presented or amended

PRESENTATIONS, DISCUSSION AND ACTION ITEMS, REPORTS

2. Connect SoCal 2024

(Director Diep, TAC 8
CDR and Chair
Equina) – 30
minutes

Recommended Action: Receive report

3. SCAG Meeting Updates

(Chair Equina) – TAC 114
5 minutes

Recommended Action: Receive report

4. OCCOG REAP to 2.0 application

(Executive TAC 126
Director Primmer
and SCAG staff)
– 25 minutes

Recommended Action: Receive Report

REPORT FROM CHAIR/VICE CHAIR

MATTERS FROM OCCOG TAC MEMBERS

ANNOUNCEMENTS FROM NON-MEMBERS

ITEMS FOR NEXT MEETING

IMPORTANT DATES OR UPCOMING EVENTS

January 12th – Connect SoCal 2024 comments due to SCAG
January 18th – SCAG Technical Working Group from 10 am – 12 pm

REMINDERS: Please enter your name and agency in the chat box

Adjourn to: FEBRUARY 6, 2024



AGENDA ITEM # 1

Minutes of December 5, 2023

Draft Action Minutes

The Orange County Council of Governments Technical Advisory Committee (OCCOG TAC) meeting of December 5, 2023, was called to order at 9:30 am by Chair Justin Equina, City of Irvine. The meeting was held through video and telephone conferencing.

PUBLIC COMMENT:

There were no public comments.

ADMINISTRATION

1. OCCOG TAC Meeting Minutes

The OCCOG TAC meeting minutes of November 7, 2023 were unanimously approved by the TAC.

PRESENTATIONS, DISCUSSION AND ACTION ITEMS, REPORTS

2. Center of Demographic and Research (CDR) Update

CDR Director Deborah Diep provided updates on the following efforts:

CDR Housing Inventory System (HIS)

The July-December 2023 HIS data is due on January 19, 2024. Please submit data to CDR using the HIS form located at <http://www.fullerton.edu/cdr/HISform.xls>. For HIS questions, please contact Paul Lewis, CDR's Demographic Analyst at 657-278-3417 or palewis@fullerton.edu.

ADU Activity Report 2005-2022

CDR's new ADU activity report is now available online:

Direct link: https://www.fullerton.edu/cdr/products/ADU_2005_to_2022_report.pdf

All housing reports: <https://www.fullerton.edu/cdr/products/housingactivityreports.aspx>

Inventories of Business Licenses

CDR is updating its employer database in preparation for the next set of Orange County Projections. Any jurisdiction that has an inventory of businesses within their jurisdiction or business license file should contact CDR if the information can be verified or incorporated into the employee file for the OCP-2026 base year estimates.



Orange County Data Acquisition Partnership (OCDAP)

OCDAP Cycle 2 signups will continue through June 2024; costs are not prorated. Instructions on how to sign up via the Cycle 2 Participation Agreement (PA) can be downloaded at http://www.fullerton.edu/cdr/OCDAP/OCDAP_Documents_Products.aspx. Email the electronically-signed PA PDF document to Marnie Primmer at marnie@occog.com.

RFP preparation for Cycle 3's imagery capture in early summer 2024 is underway. Those interested in Cycle 3 (FY2024/25-2025/26) can contact Deborah Diep at ddiep@fullerton.edu

3. Department of Finance Housing Unit Survey (HUS)

Douglas Kuczynski and Jordan Bruhn, DOF, provided an overview and solicited feedback on the revised Housing Unit Survey (HUS) form for the State Department of Finance. The draft can be reviewed here: https://cadof.qualtrics.com/jfe/form/SV_0kU83WKdA8RionA. The password to think link is Cola24.

4. AB 965 (Broadband Permit Application) Presentation

Dr. Jonathan L. Kramer, Esq from Telecom Law Firm, provided an overview of AB 967. The new law outlines Batching Broadband Permit Processing with is simultaneous processing for more than one substantially similar broadband permit application. This likely applies to Fiber, Wired or Wireless Facilities, Cable TV, and any other facilities used to transport broadband data, video or voice services by wire or radio. AB 965 is effective January 1, 2024.

5. 2024 Connect SoCal – Ad Hoc Review Committee

Chair Equina reported that the first 2024 Connect SoCal Review Ad Hoc Committee met on November 15 and will meet for the next three Wednesdays at OCTA from 9 a.m. – noon. The comments will be compiled for approval at the Special OCCOG Board Meeting before the January 12, 2024 deadline.

6. 2024 TAC Meeting Calendar Preview

Chair Equina presented the draft calendar for 2024 OCCOG TAC meetings and solicited feedback from members. A revision was made to the 2024 TAC Meeting Calendar and approved by the committee. The July 2nd meeting was changed to July 9, 2024. The 2024 OCCOG calendar was approved.



7. Executive Director Update

The TAC members had no objections to appointing Anaheim Principal Transportation Planner, Joseph Alcock, to represent Orange County on the mobile Source Air Pollution Review Committee (MSRC). The alternate position is still open.

REPORT FROM CHAIR/VICE CHAIR

Neither Chair Equina nor Vice Chair Zdeba had anything further to report.

MATTERS FROM OCCOG TAC MEMBERS

There were none.

ANNOUNCEMENTS FROM OCCOG TAC NON-MEMBERS

There were no items to report from non-OCCOG TAC Members.

ITEMS FOR NEXT MEETING

There were none.

IMPORTANT DATES OR UPCOMING EVENTS

- December 8th – Connect SoCal 2024 Public Hearing; 10 a.m. – Noon
- December 14th – SCAG Technical Working Group; 10 a.m. – Noon
- January 11, 2024 – OCCOG Special Board Meeting; 2 – 4:30 p.m.
- March 28, 2024 – OCCOG Annual Conference; 9 a.m. – 1 p.m.

ADJOURNMENT

The meeting was adjourned by Chair Equina until January 9, 2023, via video and teleconferencing.

Submitted by:

Justin Equina, City of Irvine
OCCOG TAC Chair



Attendees:

Name	Agency
Alexa Smittle	Seal Beach
Amanda Lauffer	Anaheim
Angel Garfio	OCTA
Arlen Beck	Orange
Belinda Deines	Dana Point
Chris Chung	Garden Grove
Chris Schaefer	Fullerton
Cynthia Ravenstein	MSRC
Daniel Kesicbasian	Laguna Niguel
Derek Bingham	Rancho Santa Margarita
Deborah Diep	CDR
Doug Kuczynski	DOF
Eric Joseph	CP&A
Erin Gardner	OCCOG
Holli Safran	Santa Ana
Huong Ly	Garden Grove
Jay Eastman	Tustin
Jessica Newton	Brea
Joanna Cortez	Huntington Beach
Jordan Bruhn	DOF
Justin Equina	Irvine
Justin Urbanski	Villa Park
Katie Cawelti	CP&A
Kenneth Le	Garden Grove
Kevin Nord	DOT
Kori Sanders	Cypress
Lisa Telles	OCCOG



Technical Advisory Committee January 9, 2024

Orange County Council of Governments

Marnie Primmer	OCCOG
Nayaly Casillas	La Habra
Paul Lewis	CDR
Rebecca Pennington	Brea
Robert Garcia	Orange
Ron Santos	Lake Forest
Rose Rivera	Aliso Viejo
Rubaiya Zaman	CDR
Samantha Beier	Tustin
Shaun Temple	Seal Beach
Sonya Lui	La Habra
Tiffany Lin	Irvine
Tom Oliver	Los Alamitos
Tom Vo	SCAG
Wendy Starks	RSM
Yuritzy Randle	County of Orange



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

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



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION			
8	General Comment	All documents	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, otherwise known as "Spheres of Influence" the growth must be feasible			
9	General Comment	All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.			
10	General Comment	All maps and figures with growth forecast data, TAZ data, or forecasted development pattern	Add: language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."			
11	General comment	All documents	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/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 notes to language and table or figures that indicate "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>			
12	Correction	All pages All documents e.g., 45, 50, 59, 60, 96	References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"			
13	General Comment	All pages	"state of California" should be "State of California" "county/counties of xxx" should be "County of xxx"			
14		Glossary	Add to glossary:	CPI CTC	LMFP MBPS	SCP SCRRRA



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION			
			15-minute communities ACS AFFH ASMSA AT AVTA BTU BUILD CAL ITP CALFIRE CAV CCED CCSO communities of color CPAD	DOT EEC FEMA FHSZ FLMA FMMP GDP historically marginalized HQTACs HSD ICT Indigenous populations INFRA LC LMFDS	MIP NHHW NHS OCFC PACT Protected populations p.188 Priority communities p.188 PTS PUMS RFM1 RIF RRIF RTPAS SAFETEA-LU SCM1 SCORE	SMAQ SOAR SOT SPM SSO TCA TEZ TIF TMO TMP TWMO UBM WHAR12 ZETI
15	Revision	p. 9, second paragraph under "Mobility"	Revise the last sentence and insert the word "safety." For example: "However, more work is needed to be better manage both the viability, safety , and reliability..."			
16	Correction	p. 10	RH column. SB 375 was passed in 2008, please delete reference to this as recently passed. "..With the more recent passage of SB 375."			
17	Clarification	p. 10; column 1; paragraph 1; last sentence	"SCAG will collaborate with federal, state and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, <u>preserve most reasonably utilize</u> natural lands and reduce GHG emissions."			
18	Comment	p. 12, first bullet point under "Focusing on Objectives"	Explain how SCAG aims to make transit the backbone of the transportation system? It seems to contradict the current state of our transit system – low ridership and public safety concerns.			
19	Clarification	p. 12; column 2; paragraph 1; sentence 1	"By 2050, the population of the region is projected <u>in the Plan</u> to increase by two million people, or 11 percent, with an increase of 1.6 million housing units, or 26 percent, and 1.3 million jobs, or 14.2 percent."			
20	Clarification	P. 12, column 2; paragraph 3	" <u>This plan projects that</u> sSixty-seven percent of new households and 55 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities."			
21	Clarification	P. 13, column 2; paragraph 1; last sentence	"Within those elements, the Plan also strives to achieve broader regional objectives, such as increased housing production, improved equity and resilience, the preservation most reasonable utilization of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources."			



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
22	Clarification	p. 14 & p. 78	SCAG stated that it is not in charge of implementation, but the graphic and its presentation seems to imply that SCAG is a part of implementation. Make SCAG's role more clear in that it is not in charge of implementation.
23	General comment	p. 26	<p>This Plan includes strategies that were in 2020; therefore, not new ideas. Should Section 2 include a summary of how the last RTP/SCS performed. "Since approval of the 2020 RTP/SCS the region has made great progress in these areas..."</p> <p>What was the performance of the 2020 RTP? A summary of the 2020 RTP/SCS Progress provided on pages 178-179 should be summarized at the beginning of Chapter 2. Where are we at and what needs to be done? There was no initial summary at the beginning of the report, which would have been helpful.</p>
24	Clarification	p. 29; paragraph 3 last sentence	<p>"The history of <u>some</u> transportation and housing policies in both the United States and California demonstrates how racism in government..."</p> <p>"This data shows that 18.4 percent of fatal collisions in 2021 involved <u>non-Hispanic</u> Black victims, who represent just over 6 percent of the population."</p> <ul style="list-style-type: none">• Is this 18.4% of walking and biking fatalities or all transportation fatalities?• Cite data source for fatalities.
25	Clarification	p. 31, column 1, paragraph 1	<p>"The COVID-19 pandemic <u>and the response to it</u> impacted the way we live, work and play in the region—and we are still feeling those impacts today. When SCAG's Regional Council adopted Connect SoCal 2020 for all purposes in September 2020..."</p> <ul style="list-style-type: none">• Clarify what "for all purposes" was Connect SoCal adopted.
26	Clarification	p. 31, column 1, paragraph 3; sentence 2	<p>"The pandemic <u>response</u> provided additional shocks – a near-zero level of foreign immigration, fewer births and excess deaths from the pandemic itself."</p>
27	Clarification	p. 34, column 2, paragraph 2; last sentence	<p>"These Guiding Principles should be considered as a starting point and <u>may be</u> used as building blocks that agencies and local jurisdictions can adapt to fit their unique needs when making informed decisions regarding emerging technology."</p> <ul style="list-style-type: none">• Are agencies required to use these or adapt them for use?
28	Source	p. 35	Second paragraph under Climate Change, what is the source of the information provided.
29	Clarification	p. 38, column 1, paragraph 1; sentence 2	<p>"We are home to an ... 109 miles local light rail, serving 108 stations, Amtrak intercity and long-distance services; ..."</p> <ul style="list-style-type: none">• Clarify 109 phrase
30	Clarification	p. 38, column 2	Add final statement: " <u>Maps contained in Connect SoCal are for general reference and provide snapshots of the region. Please contact the appropriate agency for the most recent information.</u> "
31	Clarification	p. 39, map 2.1	<ul style="list-style-type: none">• Change "City boundary" in legend to date of city boundary, e.g., "January 1, 2023 City boundaries"• Freeway and highways are difficult to tell apart; change symbology.• Relabel Freeways to <u>Freeways/Toll Roads</u>• Add Year to title• Define bottlenecks or add note referring reader to Technical Report if information is included in another Connect SoCal document.



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
32	Clarification	p. 40, map 2.2	<ul style="list-style-type: none">Why is map labeled 2019/2022?Label each layer's year as applicable or add source notes.Add definitions of rapid bus and bus rapid transit or add note referring reader to where the definitions are.
33	Clarification	p. 41, map 2.3	<ul style="list-style-type: none">Add year to titleChange "City boundary" in legend to date of city boundary, e.g., "January 1, 2023 City boundaries"Freeway and class 1 bike lanes are difficult to tell apart; change symbology.Add definitions for lane classifications or refer readers to locations.Clarify the two sets of bike lanesRelabel Freeways to <u>Freeways/Toll Roads</u>
34	Clarification	p. 42, map 2.4	<ul style="list-style-type: none">What data year is map displaying?Change "City boundary" in legend to date of city boundary, e.g., "January 1, 2023 City boundaries"Freeway and arterials are difficult to tell apart; change symbology.Relabel Freeways to <u>Freeways/Toll Roads</u>
35	Clarification	p. 45, paragraph 1; sentence 2	"Responses to the COVID-19 pandemic sparked changes in travel behavior and trends, which spotlight what is needed and what is possible for the future of transportation in our region."
36	Clarification	p. 47, column 2; paragraph 2	"The patterns that characterize our communities largely come down to housing and households. Over half of the region's 6.6 million housing units were built before 1980. <u>For the purposes of Connect SoCal, the category of "multi-family" residential units includes townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as 'multi-family' units that are attached residences, including apartments, condominiums and townhouses.</u> While 54 percent are single-family homes, 46 percent are multifamily homes such as condominiums, townhouses and apartments..."
37	Clarification	p. 47, column 2; paragraph 2; sentence 4	"The predominant form of new housing construction has fluctuated over time—a function of the number of people entering their 20s and 30s (the main household formation years) and other aspects of the housing market, <u>including limited land availability in some parts of the region.</u> "
38	Clarification	p. 48, Figure 2.1	Is this the number of permits issued or number of units permitted? DOF doesn't report the number of permits in E-5 file.
39	Revision/Deletion	p. 49	Remove and/or revise the exhibit on this page. It appears that the region is building housing beyond the population growth needs.
40	Clarification	p. 49, column 1; paragraph 1; sentence 2	"...In a high-cost urban megaregion with decreasing family sizes, the single-family-heavy skew of the current housing stock puts homeownership more out of reach for low- and moderate-income households, while also increasing overcrowding rates and travel distances." <ul style="list-style-type: none">Doesn't more single-family units increase the number of options for buyers, which result in a benefit through the ability to build equity?
41	Clarification	p. 49, column 2 figure	<ul style="list-style-type: none">What was pattern of building 1950-1980? Did we overbuild, underbuild or right-size build?2000-2020 "green" housing figures- does this imply we overbuilt in 2000-2020 period?Is assumption of 3.0 pphh appropriate?



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
42	Clarification	p. 51, map 2.5	<ul style="list-style-type: none">• Add to title "(Jobs per ____ square mile? ____)"• Relabel Freeways to <u>Freeways/Toll Roads</u>
43	Clarification	p. 52, map 2.6	<ul style="list-style-type: none">• Add to title "(per ____ square mile? ____)"• Relabel Freeways to <u>Freeways/Toll Roads</u>
44	Clarification	p. 53, map 2.7	<ul style="list-style-type: none">• Add data year to title• Add link to where land use definitions are• Explain if these are the consolidated land use categories and not the original jurisdiction maps
45	Clarification	p. 54, column 1; sentence 3	<p>"...Years of underbuilding has resulted in a shortfall in the number of units needed to house the region <u>comfortably</u> and created issues such as cost burden and overcrowding."</p> <ul style="list-style-type: none">• Define cost burden & include reference source/as defined by...• Define overcrowding & include reference source/as defined by...
46	Clarification	p. 54, column 2; paragraph 2 sentence 1	<p>"The quantitative impacts of the housing crisis, such as overcrowding, cost burden and <u>low</u> home ownership, disproportionately burden communities of color."</p>
47	Clarification	p. 54, column 1; paragraph 1 sentence 5	<p>"Households that spend more than 30 percent of their income on housing are considered <u>cost-burdened</u>"overpaying" and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases."</p> <ul style="list-style-type: none">• "overpaying" is not the same as "cost-burdened" - overpaying is associated with the cost of the rent, not the share of income being paid on rent.
48	Clarification	p. 54, column 2; paragraph 1 sentence 1	<p>"A recent comprehensive study on the California homelessness crisis found that the majority (89 percent) of unhoused persons lived in California prior to becoming unhoused, and the primary factors leading to homelessness were economic or social."</p> <ul style="list-style-type: none">• List or define the "social" factors.
49	Clarification	p. 54, column 2; paragraph 2 sentence 1	<p>"Out-migration: While the region typically loses more residents to other states and counties than it gains, domestic out-migration increased notably early in the <u>COVID-19</u> pandemic. While slow or negative growth can reduce projected housing need, domestic out-migration reflects <u>several factors</u>, <u>including</u> the inability <u>or</u> lack of desire of Southern Californians to stay in the communities they call home. <u>Out-migration</u> is is one economic response to a too-small housing supply, alongside overcrowding, cost burden, becoming unhoused, and the suppression of life-cycle ambitions (e.g., household formation and homeownership)."</p>
50	Clarification	p. 56, column 1; paragraph 1 sentence 2	<p>"...Poor Local air quality and the lack of dependable transportation options, active transportation, affordable housing, health care and job opportunities in many SCAG region communities can lead to poor health outcomes."</p>
51	Clarification	p. 56, column 1; paragraph 2; sentence 1	<p>"Natural lands (<u>see glossary for definition</u>) offer important benefits to the region, including capturing carbon emissions and recharging groundwater resources. However, natural lands have decreased by roughly 50,000 acres, or 0.2 percent, between 2012 and 2019. Farmland decreased by 40,000 acres, or 3.5 percent, between 2012 and 2018. While farming practices can contribute to GHG emissions, these are typically far less than emissions in urban environments, and farm and grazing lands can provide"</p>



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



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



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



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



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



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



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> SCAG should defer to regulatory agencies for definitions and regulations
97	Clarification	p. 104, column 1, paragraph 4	"Natural Community and Habitat Conservation Plans: (<u>NCCP and HCP</u>) These plans identify and provide for the regional protection of plants..."
98	Clarification	p. 105, map 3.5	<ul style="list-style-type: none"> Add data year to title Relabel Freeways to <u>Freeways/Toll Roads</u>
99	Clarification	p. 106, column 1, paragraph 1, sentence 3	"However, we know that alleviating the severity of the housing crisis requires a <u>considerable</u> commiserate commitment of resources."
100	Clarification	p. 109, column 1, paragraph 1, sentence 3	<p>"The region must rise to meet the moment by investing in the adequate supporting infrastructure for all vehicle classes."</p> <ul style="list-style-type: none"> Reword "rise to meet the moment"
101	Clarification	p. 109, column 1, paragraph 2, sentence 3	"However, both financial, <u>supply</u> , and infrastructure barriers are keeping many people in the region from transitioning to clean transportation."
102	Clarification	p. 109, column 1, paragraph 3, sentence 3	"Low-income communities are the most impacted from older-vehicle emissions, and an additional rebate program could serve to both accelerate the transition to cleaner vehicles and ensure that the related health <u>benefits</u> also benefit SCAG's Priority Equity Communities."
103	Clarification	p. 111, column 2, last paragraph, sentence 2	"By investing in a more efficient goods movement network, Universal Basic Mobility and improved access to recreational trails, <u>the SCAG region</u> is not only making broad improvements to the general regional economy but is focusing specifically on areas of disparity..."
104	Clarification	p. 111, column 1	"12. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible "
105	Clarification	p. 117, column 1	Add new under 41: "Support a mix of housing types throughout the region to support access for all levels of income—including single-family detached homes—to increase opportunity for equity-building through home-ownership for lower-income households."
106	Clarification	p. 118, column 1	"49. Promote <u>Implement</u> the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning"
107	General comment	p. 119	Climate resilience policies seem to be lacking as far as transportation infrastructure is concerned. Consider policies here that encourage: <ul style="list-style-type: none"> -embedding climate resilience into transportation infrastructure planning and management -transportation infrastructure capital investments and innovation to scale climate resilience -help communities achieve resilience, safety, health, equity and economic vitality
108	Comment	p. 121, Regional Planning Policy #89 (Tourism)	Encouraging alternative modes of transportation for tourist traveling to the SCAG region does not seem feasible. What other modes of transportation would allow a visitor to easily travel from the airport to the city, to the mountains, to the beach?



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109	Clarification	p. 121, column 1	<p>"81. Promote <u>an increased variety of</u> payment credentials for disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers"</p> <ul style="list-style-type: none"> What are "payment credentials"?
110	Clarification	p. 121, column 2	<p>"89. Encourage the reduced use of cars by visitors to the region by working with state, county and city agencies to highlight and increase access to <u>safe</u> alternative options, including transit, passenger rail and active transportation"</p>
111	Clarification	p. 123, column 1; paragraph 1	<p>Add clarification information for the table starting on page 124 by inserting following to page 123's first paragraph:</p> <p><u>Note that the list of other responsible parties is not exhaustive. The strategies starting on the following page identify areas where SCAG can:</u></p> <ul style="list-style-type: none"> <u>Lead: SCAG may act as a collaboration leader, advocate on state or federal legislation and/or initiate new research in furtherance of SCAG's policies and goals. SCAG already has or will begin to move forward on this strategy.</u> <u>Partner: SCAG may provide technical assistance or grant resources to jurisdictions, agencies, organizations, and other entities in furtherance of SCAG's policies and goals. Successful implementation of the strategy will depend on other governments, agencies or organizations, and entities. SCAG already has or will begin to move forward on this strategy.</u> <u>Support: SCAG will provide ongoing support (toolbox Tuesday, provide subject matter expert presentations to elected officials, letters of support in grant applications) to efforts led by other agencies or organizations. While SCAG does not have a direct and tangible role to move forward on this strategy, it remains engaged to provide continued support to advance projects that further SCAG's policies and goals.</u>
112	Clarification	p. 124	<ul style="list-style-type: none"> Add table number and table title Add asterisk to "Other Responsible Parties*" and display footnote on each page: "<u>List of parties is not exhaustive</u>"
113	Correction	p. 124	<p>First strategy – consider adding "performance" to "...regional performance targets.."to denote an ongoing process of monitoring and adaptive management.</p>
114	Revision	p. 124, Mobility, Complete Streets Strategy	<p>Revise the Strategy #4, SCAG should not take the lead in developing a complete streets network. This type of effort would require</p>
115	Clarification	p. 125	<p>Strategy #6. SCAG role, Partner? (Maybe Support?) SCAG has no land use authority, what would SCAG's role be as Partner.</p>
116	Clarification	p. 125	<p>Strategy #9. Not clear what this strategy entails</p>
117	Clarification	p. 125, 128, 129, 132 Table footnote	<p>"* (Asterisks) denote strategies that support quantified GHG emission strategies that help to reach SCAG's <u>greenhouse gas reduction target set by CARB.</u>"</p>
118	Clarification	p. 126	<p>Strategy #3. What's the purpose of developing more TMAs/TMOs? Is this in areas where none TMA's exist? Does CTC initiate this?</p>



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119	Correction	p. 127	Strategy #s 5 and 8. Add Transit/Rail Agencies to “Other Responsible Parties” or add an asterisk to say the list of agencies under “Other Responsible Parties” is not exhaustive (unless if others feel its implied)
120	Clarification	p. 128	Strategy #4. This is the only Strategy under which, “Toll Authorities” are mentioned. How are toll authorities defined?
121	Clarification	p. 129, line 2 (second item under Priority Development Areas)	“ Develop Support housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency.” Change from “partner” to “support.”
122	Clarification	p. 129	Strategy #1. SGC under Other Responsible Parties. Define at first use. (Strategic Growth Council)
123	Clarification	p. 129	Strategy #5, households of color, should this be BIPOC (Black, Indigenous and People of Color)
124	Clarification	p. 131	Strategy #s 2 and 7 No other responsible parties? Local jurisdictions. Private sector companies?
125	Clarification	p. 132	Strategy # 1. The strategy is for PPP but Private Sector Companies are not identified in the Other Responsible Parties
126	Clarification	p. 132	Strategy # 2. The strategy is to assist local jurisdictions, but the SCAG role disposition is “Lead” Consider changing to Support or Partner
127	General comment	p. 132	Natural and Agricultural Lands Preservation. While part of “natural lands” wetlands, due to their importance in the ecosystem should be called out. For example, ref to “..conserve and restore <u>wetlands</u> , natural and agricultural lands.” [The PEIR defines <i>Natural lands as Biologically diverse landscapes such as forested and mountainous areas, shrub lands, deserts and other ecosystems which contain habitat that supports wildlife and vegetation</i>].
128	General comment	p. 132	Strategy #6. RAMP VMT mitigation. “Work with implementation agencies to support, establish or supplement <u>elective</u> regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process”
129	General comment	p. 132	Strategy #8. Consider rewording to be consistent with Policy #62 on p119, you typically don’t restore wildlife corridors. Suggest, “Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, <u>protect and restore wetlands and natural habitats</u> , habitat and wildlife corridor restoration , greenway <u>and wildlife</u> connectivity and similar efforts.”
130	General comment	p. 133	Strategy #2. SCAG role should be Partner/Support since local jurisdictions are responsible for developing their own CAPs
131	Clarification	p. 134	Strategy #2. Clarify if MSRC is a SCAG committee
132	Clarification	p. 134	Strategy #8. Who issues the regional/statewide universal permit?
133	Clarification	p. 135, column 1	“Continue to develop an understanding of low-income travel patterns and needs, and the impact of shocks (e.g., COVID pandemic response and telework adoption) on low-income travel”
134	Clarification	p. 138	“This chapter ... to meet milestones to implement Connect SoCal <u>2024</u> .”
135	Clarification	p. 139; all pages	“FIGURE 4.1 FY2024/25–FY2049/50 RTP/SCS Revenues (in Nominal Dollars, Billions)”



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			<ul style="list-style-type: none"> Add full fiscal year identifiers to clarify the years covered in all figures and references
136	Clarification	p. 139; all references to SCAG Financial Model 2023	<p>"SCAG <u>Connect SoCal</u> Financial Model 2023</p> <ul style="list-style-type: none"> Add Connect SoCal reference to sources regarding financial model P. 150, 154, 155, 156, 171
137	Clarification	p. 139; Figure 4.2	" <u>Operations and Maintenance (O&M) Transit</u> "
138	Clarification	p. 135; column 2, sentence 2	"The COVID-19 pandemic <u>response</u> has had a significant impact on travel patterns and economic activity, and..."
139	Clarification	p. 144; Figure 4.3	<ul style="list-style-type: none"> "FIGURE 4.3 Historical Inflation Trends (<u>Year-Over-Year Annual Inflation</u>)" Add label "Inflation" to Y-axis Why is inflation only through 2019? X-axis only shows to 2018
140	Clarification	p. 145; Figure 4.4	Add label "Index (2020=100)" to Y-axis
141	Clarification	p. 146; column 1; paragraph 1; sentence 2	"Suppressed consumer spending during the initial pandemic <u>response</u> period resulted in significant declines in retail sales <u>due to shutdowns in response to the pandemic</u> . Likewise, recessions and economic slowdowns also reduce personal consumption."
142	Clarification	p. 146; column 1; paragraph 2; sentence 2	<p>"...Though changes in regional vehicle miles traveled will continue to play a role during the Plan period, increases in conventional fuel efficiency and the adoption of alternative fuel and alternative-powered vehicles will reduce overall fuel consumption."</p> <ul style="list-style-type: none"> What is the reference to "regional" vehicle miles traveled?
143	Clarification	p. 146; column 2; paragraph 3; sentence 1	"At the time of the <u>2024</u> Connect SoCal Plan, three decades have passed without substantive Congressional agreement on a long-term solution..."
144	Clarification	p. 153; Table 4.2	<ul style="list-style-type: none"> Replace "Total" with "SCAG Region" at bottom of table. Add note that fiscal year indicates the date the fiscal year ends Right-justify all data columns.
145	Correction	p. 154; column 1; paragraph 1; sentence 2	"The share of state sources (32 percent) is relatively unchanged since the <u>2020</u> last RTP/SCS."
146	Clarification	p. 154; Figure 4.8	<ul style="list-style-type: none"> Add population share of region into the legend showing the share of revenue.
147	Clarification	p. 157; column 2; paragraph 1; sentence 5	<p>"... These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation and potential equity concerns."</p> <ul style="list-style-type: none"> Add Oxford comma to clarify which statement is accurate: These factors include technology and associated privacy issues, cost of implementation, and administrative methods for fee collection/revenue allocation and potential equity concerns." These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation, and potential equity concerns."



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148	Clarification	p. 159; column 2; Local Road Charge Program	<p>"Local road charge program assumes a \$0.020 (in 2019 dollars) per mile charge throughout the region that can be implemented on a county basis."</p> <ul style="list-style-type: none"> How would this be done for residents vs. visitors?
149	Correction	p. 160; column 2	<p>"Transportation Development Act (TDA)... Description: The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> cent sales tax on retail sales statewide."</p>
150	Correction	p. 162; column 2; RMRA sentence 2	<p>"Description: The RMRA... Although the RMRA also provides SHOPP funding, for purposes of the <u>2024 2020</u> RTP/SCS financial plan, it only reflects the portion directed to counties and cities."</p>
151	Clarification	p. 168; column 1; sentence 2	<p>"Efforts are underway to explore transition from our current fuel tax-based system based to a more direct system of road user fees."</p>
152	Clarification	p. 174; paragraph 2	<p>"The Connect SoCal 2024 performance monitoring program integrates federal transportation system performance management and Equity/Environmental Justice measures and metrics specific to a set of federal transportation conformity planning, reporting requirements for designated criteria air pollutants and to support the achievement of regional greenhouse gas emissions reduction targets established by the California Air Resources Board."</p> <ul style="list-style-type: none"> Sentence is incomplete
153	Clarification	p. 178; column 4	<p>"\$1.00 < \$2.00 <u>\$1.00 = \$2.00</u></p> <p>INVESTMENT BENEFIT \$754 <u>Average</u> Annual Transportation Cost Savings per Household 277,800 <u>Average</u> Annual New Jobs from Transportation Investments 480,100 <u>Average</u> Annual New Jobs from Transportation Investments and Increased Competitiveness"</p>
154	Clarification	p. 182; paragraph 2; sentence 2	<p>"Improving the region's mobility and enabling more sustainable development can provide a myriad of co-benefits, including reduced energy and water use."</p>
155	Clarification	p. 183; column 2; paragraph 1; sentence 3	<p>"A livable community is defined by a cohesive, <u>physically</u> active and engaged population."</p>
156	Clarification	p. 186; column 1; paragraph 2; sentence 3	<p>"However, decreased travel during the <u>shutdowns in response to the COVID-19</u> pandemic most likely helped the achievement of the 2020 target, so continued effort will be necessary to sustain progress and Plan implementation to reach the 2035 target."</p>
157	Clarification	p. 188; column 1; paragraph 2; sentence 2	<p>"The increased competitiveness and improved economic performance <u>created</u> induced by these expenditures will generate an additional 202,300 jobs per year <u>on average</u> due to enhanced network efficiency."</p>
158	Clarification	p. 188; column 2; paragraph 1; sentence 2	<p>"The purpose of the Equity Analysis is to evaluate the potential impacts of the implementation of the Plan on communities, including both protected populations, as defined by federal regulation, and priority communities, as identified by SCAG and regional stakeholders. The preparation of the <u>Plan</u> report relied heavily..."</p> <ul style="list-style-type: none"> Define 'protected populations' and 'priority communities'



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
159	Clarification	p. 188; column 2; paragraph 2; sentence 1	"One method SCAG used to determine if the Plan caused disproportionate and adverse impacts to historically marginalized and disadvantaged communities is through the identification and assessment of Priority Equity Communities. <ul style="list-style-type: none">• Define 'historically-marginalized community'
160	Clarification	p. 188; column 2; paragraph 2; last sentence	"For more detail on the methodology used to develop Priority Equity Communities, see the Equity Analysis <u>in Section... or in Technical Report...</u> "
161	Clarification	p. 189; Map 5.1	<ul style="list-style-type: none">• Add year to title• Add note to map: "Priority Equity Communities are census tracts in the SCAG region that have a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors."
162	Clarification	p. 191; column 2; line 4	"Number of jobs??? employers??? employments reachable within 15-30 15/30 minutes by automobile and 15-45 15/45 minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds"
163	Clarification	p. 191; column 2; line 5	"Number of retail establishments reachable within 15-30 15/30 minutes by automobile and 15-30 15/30 minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds"
164	Clarification	p. 191; column 3; line 1	"This analysis confirmed <u>the</u> typical patterns <u>that</u> of higher income transit riders tend to ride the train, while lower income transit riders tend to ride the bus. <u>Non-Hispanic</u> Black travelers had the lowest automobile mode share, while Hispanic/Latino and <u>non-Hispanic</u> Asian travelers had the highest. non-Hispanic m Multiracial travelers reported the highest walking and biking mode shares."
165	Clarification	p. 191; column 3; line 2	"Results anticipate increases in miles traveled on transit and decreases in miles traveled by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person miles traveled for lower income quintiles and for <u>non-Hispanic</u> Black and <u>non-Hispanic</u> Asian travelers."
166	Clarification	p. 191; column 3; line 3	"Results anticipate increases in time spent on transit and decreases in time spent traveling by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person hours traveled for higher income quintiles and for Hispanic/Latino and <u>non-Hispanic</u> White travelers."
167	Clarification	p. 191; column 3; line 4	"Access to jobs is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are several decreases in auto access to jobs for specific populations in Priority Equity Communities, including <u>non-Hispanic</u> Black, Hispanic/Latino, the two lowest income quintiles, and households below the Federal Poverty Level, limited-English proficiency population, and zero-vehicle households."
168	Clarification	p. 191; column 3; line 5	"Access to shopping is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are slight decreases in auto access for the <u>non-Hispanic</u> Black population and in bicycle access for the Hispanic/Latino population in Priority Equity Communities."



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
169	Clarification	p. 192; column 2; line 1	"Percent of population that can reach a park location within 15-30 <u>15/30</u> minutes by automobile and 15-30 <u>15/30</u> minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds"
170	Clarification	p. 192; column 2; line 2	"Number of schools within 15-30 <u>15/30</u> minutes by automobile and 15-30 <u>15/30</u> minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds"
171	Clarification	p. 192; column 2; line 3	"Number of health care facilities within 15-30 <u>15/30</u> minutes by automobile and 15-30 <u>15/30</u> minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds"
172	Clarification	p. 192; column 3; line 1	"...The largest decreases are for <u>non-Hispanic</u> Hawaiian-Pacific Islander and <u>non-Hispanic</u> Native American populations where the decrease in auto access in Priority Equity Communities exceeds the regional change; and for the <u>non-Hispanic</u> Native American population where the decrease in bicycle access in the region exceeds the decrease in Priority Equity Communities. "
173	Clarification	p. 192; column 3; line 2	"Access to schools... while transit access decreases for <u>non-Hispanic</u> Black people and zero-vehicle households in the region but increases for the same populations in Priority Equity Communities. "
174	Clarification	p. 192; column 3; line 3	"Access to healthcare... except for auto decreases for <u>non-Hispanic</u> Black and Hispanic/Latino populations, all but the highest income quintile, and all other priority populations analyzed in Priority Equity Communities, despite increases at the regional level. "
175	General comment	p. 193	The section on "Other Freeway or Expressway" should be expanded to include a detailed coding of the region's freeway system (mixed-flow lane, auxiliary lane, HOV lane, HOT lane, toll lane, and truck lane, <u>toll roads</u> , etc.)
176	Clarification	p. 193; column 3; line 3	"Gentrifying neighborhoods and those with high eviction filings had higher percentages of <u>non-Hispanic</u> Black and Hispanic/Latino people..."
177	Clarification	p. 193; column 3; line 4	"In the base year, there is a higher concentration of low-income <u>people???households???</u> and some people of color in areas adjacent to railroads and railyards, and it is expected that this concentration <u>may</u> could grow in the Baseline and Plan scenarios. SCAG anticipates nominal Plan impact, and that population changes would generally follow that of the SCAG region."
178	Clarification	p. 194; column 3; line 1	"The forecasted growth patterns included in the Plan reduced risks for <u>non-Hispanic</u> Asian households in earthquake zones, nominal changes to existing exposures to sea level rise, wildfires, extreme heat, drought and earthquake hazards. Although impacts from climate-related hazards are not always geographically isolated, overall <u>non-Hispanic</u> White populations reside disproportionately in climate hazard zones."
179	Clarification	p. 194; column 3; line 3	"...In 2050, <u>non-Hispanic</u> Asian and foreign-born populations are expected to grow in freeway-adjacent areas, though there are no significant differences with the Plan. Emissions reductions in freeway-adjacent areas are significant compared to the share of the region's total land area, but the Plan impact is still expected to be more pronounced in the region, compared to the freeway-adjacent areas, including areas that overlap with Priority Development Areas. <u>Non-Hispanic</u> Black..."
180	Correction	p. 195	Map 4-1. The Toll Roads in Orange County are not Interstate Highways, suggest adding a Toll Roads category or code as Other Freeway



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
181	Clarification	p. 195; column 3; line 1	"Increased air passenger demand itself has not resulted in increased aviation noise exposure, as increased air passenger activity but reduced aircraft operations have resulted in reduced aircraft noise." <ul style="list-style-type: none">• Sentence is incomplete; please reword
182	Clarification	p. 195; column 3; line 4	"The Plan is expected to invest a greater proportion into projects that benefit the lowest income quintile, and <u>non-Hispanic White</u> , <u>non-Hispanic Black</u> and people who identify as another race (i.e., <u>non-Hispanic Native American</u> , <u>non-Hispanic Native Hawaiian/Pacific Islander</u> , some other <u>non-Hispanic</u> race alone, and two or more <u>non-Hispanic</u> races) compared to other income quintiles and Hispanic/Latino and <u>non-Hispanic Asian</u> populations."
183	Clarification	p. 196; column 3; line 1	"... Taxes that help fund projects in the Plan are expected to fall more heavily on <u>non-Hispanic White</u> and <u>non-Hispanic Asian</u> households."
184	Clarification	p. 197; column 1; sentence 4	"...Connect SoCal 2024 investments by race and ethnicity are more complicated; the Plan is expected to spend more on projects that <u>non-Hispanic White</u> and <u>non-Hispanic Black</u> people are more likely to use compared to Hispanic/Latino and <u>non-Hispanic Asian</u> travelers."
185	Clarification	p. 199; column 2	"Active Transportation (<u>AT</u>) – ..."
186	Clarification	p. 200; column 1	"ADU – Accessory Dwelling Unit – A <u>space</u> , room or set of rooms in a <u>residential unit</u> singlefamily home (and in a single family zone) that has been designated or configured to be used as a separate dwelling unit and has been established by a permit."
187	General comment	p. 201	The Regional Express Lanes Network discussion should be expanded to include HOT lanes and Toll Roads. Orange County Toll Roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission, free-flow capacity and funding the construction and operation of the facility. TCA-operated Toll roads integrate with express lane and HOT lane facilities via the common FasTrak technology that allows inter-operability and convenience for drivers
188	Clarification	p. 202; column 1	"CARB – California Air Resources Board (<u>ARB</u>) – California state..."
189	Clarification	p. 202; column 2	"CEHD – ... This committee reviews projects, plans and programs of regional significance for consistency and conformity with applicable regional plans." <ul style="list-style-type: none">• The CEHD is responsible for reviewing projects, plans and programs of regional significance for consistency and conformity with applicable regional plans? Is this the responsibility of the TCWG?
190	Clarification	p. 204; column 1	Add criteria pollutants
191	Clarification	p. 204; column 2	Add EEC
192	Clarification	p. 206; column 2	"GIS – Geographic Information System – Mapping software that links information about where things are with information about what things are like. GIS allows users to examine relationships between features. <u>These include those</u> distributed unevenly over space, seeking patterns that may not be apparent without using advanced techniques of query, selection, analysis and display."



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
193	Clarification	p. 206; column 2	<p>"Greenfield – Also known as "raw land," land that is privately owned, lacks urban services, has not been previously developed, and is located at the fringe of existing urban areas."</p> <ul style="list-style-type: none">• "and is located at the fringe" or should it be "<u>or and</u> is located at the fringe"?• Add where the definition comes from.• Could this be publicly owned?
194	Clarification	p. 207; column 1	<p>"GRRRA – Green Region Resource Areas – Derived from SB 375 statute and Connect SoCal 2020 strategies, GRRAs highlight where future growth is not encouraged <u>by SCAG</u> due to presence of open space, habitats, farmland, and/or sensitivity to natural hazards and a changing climate."</p>
195	Clarification	p. 207; column 1	<p>"Habitat Connectivity – The <u>extent</u> degree to which the landscape facilitates animal movement and other ecological flows."</p> <ul style="list-style-type: none">• Add where the definition comes from.
196	Clarification	p. 207; column 2	<p>"Household – A household <u>is a housing unit that is occupied by people and</u> consists of all the people who occupy <u>the a</u>-housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household."</p>
197	Clarification	p. 208; column 1	<p>"IGR – Intergovernmental Review Process – The review of documents by several governmental agencies to <u>consider</u>ensure consistency of regionally significant local plans, projects and programs with SCAG's adopted regional plans."</p>
198	Clarification	p. 209; column 1	<p>LAFCOLAFCo – Local Agency Formation Commission – Regional service planning agencies of the State of California that exercise regulatory and planning powers. LAFCOLAFCos regulatory powers are outlined in California Government Code Sections 56375 and 56133.</p>
199	Clarification	p. 209; column 1	<p>"Livable Communities (<u>LC</u>) – Any..."</p>
200	Clarification	p. 209; column 2	<p>"Livable Corridors (<u>LC</u>) – Livable..."</p>
201	Clarification	p. 209; column 2	<p>"MAP-21 – Moving Ahead for Progress in the 21st Century – Signed into law by President Obama on July 6, 2012. Funding surface transportation programs at over \$105 billion for fiscal years <u>ending in</u> (FY) 2013 and 2014, MAP-21 was the first long-term highway authorization enacted since 2005."</p>
202	Correction	p. 210; column 1	<p>"Measure A – Revenues generated from Riverside County's local half-<u>percentent</u> sales tax. Measure D – Revenues generated from Imperial County's local half-<u>percentent</u> sales tax. Measure I – Revenues generated from San Bernardino County's local half-<u>percentent</u> sales tax. Measure M – Revenues generated from Orange County's local half-<u>percentent</u> sales tax. Also refers to Los Angeles County's local, half-<u>percentent</u> sales tax which was authorized in 2018. Measure R – Revenues generated from Los Angeles County's local half-<u>percentent</u> sales tax."</p>



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
203	Clarification	p. 211; column 1	<p>"Multifamily Residential – <u>For the purposes of the RTP/SCS, the category of "multi-family" residential units include townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as 'multi-family' units are attached residences, including apartments, condominiums and townhouses. Multifamily residences are usually served by all utilities, are on paved streets, and are provided with or have access to all urban facilities such as schools, parks, and police and fire stations. Senior citizen apartment buildings are included in these classes. Also included are off-campus university-owned housing and off-campus fraternity/sorority houses.</u>"</p> <ul style="list-style-type: none">• Townhomes are single-family homes as defined by the State of California DOF and the U.S. Census Bureau.
204	Clarification	p. 211; column 1	<p>"Natural Lands – Biologically diverse landscapes, such as forested and mountainous areas, shrub lands, deserts and other ecosystems, that contain habitat that supports wildlife and vegetation."</p> <ul style="list-style-type: none">• Add where the definition comes from.
205	Clarification	p. 211; column 2	<p>"NIMBY – Not in My Backyard – The phenomenon where people oppose the location of a development perceived as undesirable (e.g., <u>housing</u>, landfill, freeway expansion) in their own neighborhood, <u>and often</u> but raise no objections of similar developments elsewhere."</p>
206	Clarification	p. 213; column 1	<p>"PEC – Priority Equity Communities – (Formerly Environmental Justice Areas, Disadvantaged Communities and Communities of Concern) Census tracts in the SCAG region with a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors. *For more information, see the Equity Analysis Technical Report."</p> <ul style="list-style-type: none">• Define historically marginalized• Define socioeconomic factors• List source of the definition
207	Clarification	p. 214; column 1	<p>"Proposition 1A – Passed by <u>California</u> voters in 2006, Proposition 1A..."</p>
208	Correction	p. 214; column 2	<p>"Proposition A – Revenues generated from Los Angeles County's local half-percent sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R). Proposition C – Revenues generated from Los Angeles County's local half-percent sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R)."</p>
209	Clarification	p. 218; column 2	<p>"Small-Lot Development – A practice that allows for the subdivision of lots located within existing multifamily and commercial zones to develop fee-simple housing. Typically, small lot developments are not required to be part of a homeowner's association, thus reducing the cost for home buyers."</p> <ul style="list-style-type: none">• What is "fee-simple housing"?
210	Clarification	p. 219; column 1	<p>"Sustainable Development – Sustainable development can support the region to thrive with essential resources that maintain quality of life and a growing economy in the present, such as water, energy and food supply,</p>



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			while also enabling future generations to thrive amidst both forecasted and unforeseen challenges.” <ul style="list-style-type: none">Reword beginning of sentence (italics) to provide clarity; are the “essential resources” water, energy, food supply?
211	Clarification	p. 219; column 2	“TC – Transportation Committee – SCAG Policy Committee used to study problems, programs and other matters that pertain to the regional issues of mobility, air quality, transportation control measures and communications.”
212	Clarification	p. 220; column 2	“Transportation Equity Zones (TEZs) – Communities across the SCAG region most impacted by transportation-related inequities”
213	General comment	p. 221	Congestion pricing discussion should include Toll roads and express/HOT lane networks that charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion provides improved and more efficient mobility with fewer air pollutants and GHG emissions caused by congestion.
214	Clarification	p. 221; column 1	“Universal Basic Mobility (UBM) – Programs that provide qualified residents with subsidies for transit and other mobility services. Urban Areas (UZA) – Urban Areas in the SCAG region represent densely developed territory and encompass residential, commercial and other nonresidential urban land uses where population is concentrated over 2,500 people in a given locale.”
215	Clarification	p. 222; column 1	“Vehicle Revenue Hours – The hours that a public transportation vehicle actually travels while in revenue service. Vehicle revenue hours include layover/recovery time, but exclude deadheading (vehicles not in service and driving without passengers), operator training, vehicle maintenance testing, and school bus and charter services.”
216	Clarification	p. 227; column 2; last paragraph; last sentence	“Staff gathered input from residents primarily via a survey that provided contextual and educational information. <u>The outreach activities include:</u> ”
217	Clarification	p. 227; column 2	“Public survey: 3,600+ responses” <ul style="list-style-type: none">Please clarify if this is the number of respondents or number of questions answered by respondent providing answer. It is misleading if the answer is the latter and should be clarified.

Table 2. PEIR COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	PEIR	General: For an EIR document, is it appropriate to use first-person references (e.g., “our expansive goods movement” or “our region”), or should an EIR, as an information document, exclude such first-person references and use “the SCAG region” or something similar?
2	General Comment	PEIR	GHG Emission Reduction Target: The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being “19% below 2005 levels by 2035.” Should these references identify that this is a per capita reduction target, to eliminate any potential misunderstanding of the



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			19% 2035 reduction target equaling the 2005 GHG emissions at the regional level, minus 15% of that regional total level?
3	General Comment	PEIR	Many of the source citations in the GHG Emissions chapter cite sources dated from 2007, 2016 and 2017. What is the protocol for the using up-to-date source references? Are these from prior documents and perhaps need to be updated? Or were they used because the analysis and source material were to relate to the Plan's 2019 Existing Conditions base year?
4	General Comment	PEIR	<u>GHG Emission Reduction Target</u> : The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being "19% below 2005 levels by 2035." Should these references identify that this is a <u>per capita</u> reduction target, to eliminate any potential misunderstanding of the 19% 2035 reduction target equaling the 2005 GHG emissions at the regional level, minus 15% of that regional total level?
5	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
6	General Comment	All pages; tables; figures	Black font on teal background is difficult to read in tables and figures
7	General Comment	All tables	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
8		ES-4; bullet 3	<p>"Orange County. Orange County covers an area of 799948 square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year."</p> <ul style="list-style-type: none">County of Orange Surveyor/Public Works' official information is that OC covers ~799 square miles. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited.Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used
9	Transportation Network	ES-5	<p>The inventory of the bus routes mileage on page ES-5 warrants some clarification.</p> <p>Clarify whether the total miles of bus routes includes or excludes the separately listed bullet of express bus lanes miles. Specifically, is the 2,302 miles of express bus lanes a subset of the 33,485 miles of total bus routes listed, or a separate and additive inventory.</p>
10	Land Uses	ES-5	<p>Incorrect, interchangeable use of "households" versus "housing units". <u>Please see revised wording below.</u></p> <p>"The SCAG region is comprised of complex patterns of land uses including residential, commercial/office, industrial, institutional, agricultural, and open space land uses. The region has incredible diversity in its built environment and land use patterns (see Map ES-4, Existing Land Use, below). As of 2019, the SCAG region has a total of approximately <u>6.5 6.2</u> million <u>housing units</u></p>



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			households in its housing stock, with over half of the <u>housing units</u> households having been built before 1980. While 54 percent are single-family homes, 46 percent are <u>attached multifamily homes</u> — generically referred to as multi-family units for the purposes of Connect SoCal —such as condominiums, townhouses, and apartments. <u>There are about 6.2 million households in the SCAG region (occupied housing units).</u> ...”
11	Land Uses	ES-5	EIR states that the region contains 22 million acres of open space, combined. Included in that designation are military installations and "various private holdings". Are military installations typically included as open space?
12	Clarification	ES-6; paragraph 2; sentence 1	“The Plan was also developed to achieve <u>state</u> targets for greenhouse gas (GHG) emissions reductions...”
13	Clarification	ES-7; footnote; sentence 4	“SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements <u>in May 2022</u> , and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024.” <ul style="list-style-type: none">Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.
14	Financial Plan	ES-11; 2-30	EIR states that "Transit-related costs comprise the largest share of O&M costs for the region, totaling approximately \$250 billion." (1) Please refer the reader to the applicable table (Table 2-5, pp. 2-30 and 2-31). (2) Does "transit" include both bus and rail transit? Also, does transit include "passenger rail"? (3) Table 2-5, page 2-31, identifies Transit O&M as \$244.5 billion, in contrast to the \$250 billion cited on page ES-11. Please review and correct.
15	Alternative 1: No Project Transportation Network	ES-12 4-9	Page ES-12 of the EIR states that the Alternative 1: the No Project Alternative includes the first two years of transportation projects in the previously-conforming RTP or FTIP. Other sections of the EIR (e.g., page 4-9) reference that Alternative 1 includes the first year of programmed transportation projects. Review and confirm and make consistent in the EIR document: is it one or two years of transportation programming that is included in Alternative 1?
16	Correction	ES-13; paragraph 2; sentence 1	“As discussed in Chapter 4, Alternatives, the summary comparison for the No Project Alternative, Intensified Land Use Alternative, and the Plan is presented in Error! Reference source not found. 7, Comparison of Significant Adverse Environmental Impacts for Connect” <ul style="list-style-type: none">Insert missing information
17	Clarification	ES-15; paragraph 2	Provide a clear statement here to the following effect: All mitigation measure recommendations to project sponsors and agencies are advisory. Lead agencies are responsible for identifying and addressing those measures they deem practical and feasible, or applicable to specific projects. This would remove the need to start every project level mitigation by stating, “Project-



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



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			tolerant landscaping as well as water conserving irrigation systems. How should the mitigation measure be amended, to best address potentially conflicting objectives between aesthetics and drought-tolerance?
22	Mitigation Measures: PMM-AES-2	ES-19	<p>To address existing visual character and public views, MM PMM-AES-2 references Lead Agency measures such as developing design guidelines for projects, to make elements of proposed buildings and facilities visually compatible or to minimize the visibility of changes.</p> <p>While one recognizes that the proposed mitigation measure does emphasize that the application of the Mitigation Measure is <i>as applicable and feasible</i> by the Lead Agency, there lacks a sensitivity or recognition that for some residential projects, the looks, mass, height and general character of ministerial and by-right projects will not be negotiable between a Lead Agency and a project developer.</p>
23	Mitigation Measures: SMM-AG-3	ES-21	<p>To address farmland preservation, MM SMM-AG-3 references SCAG's development of the Greenprint web-based tool.</p> <p>a) The mitigation measure should identify that the Greenprint Tool is an <u>elective</u> tool for local jurisdictions and county transportation commissions.</p> <p>b) As referenced in the mitigation measure, is "scenario visualization" a component of the Greenprint Tool, with the current recommended directive that the Tool start small?</p> <p>c) Propose that the mitigation measure language be revised as follows: "... to support local jurisdictions and transportation agencies make better <u>informed</u> land use and transportation infrastructure decisions....".</p>
24	Clarification	Table ES-3; ES-24	<p>"PMM-AQ-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the lead agency:"</p>
25	Mitigation Measures: PMM-AQ-1: Enhanced Filtration Units	ES-26 ES-27	<p>Mitigation Measure PMM-AQ-1(z) includes an extensive inventory of enhanced air filters monitoring, inspection and maintenance program, for projects located with 500 feet of freeways and other sources. The last element of the program requires the Lead Agency to "Develop a process for evaluating the effectiveness of the enhanced filtration units."</p> <p>This last element seems to bring into question whether the enhanced air filters are effective, while nonetheless recommending a series of actions relating to their installation. Please clarify and appropriately re-word.</p>
26	Mitigation Measures: PMM-AQ-1: Title 24 Building Code	ES-28	<p>Mitigation Measure PMM-AQ-1(cc) states that a Lead Agency "Promote energy efficiency and exceed Title-24 Building Code Envelope Energy Efficiency Standards (California Building Standards Code).</p> <p>Clarify the appropriateness of a mitigation measure that seeks a Lead Agency to ask for exceeding state code requirements.</p>
27	Mitigation Measures: PMM-AQ-1:	ES-29	<p>Mitigation Measure PMM-AQ-1(ee) states that a Lead Agency should consider whether to "Lengthen the construction period during smog season</p>



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	Construction Period		(May through October), to minimize the number of vehicles and equipment operating at the same time." Is this a recommended practice that is currently in place? Please clarify how the construction period would be lengthened? Is this to extend the construction period (e.g. hours) during the day, or how many the number of days of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?
28	Mitigation Measures: PMM-AQ-1: Construction Period	ES-29	Mitigation Measure PMM-AQ-1(ee) states that a Lead Agency should consider whether to "Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time." Is this a recommended practice that is currently in place? Please clarify how the construction period would be lengthened? Is this to extend the construction period (e.g. hours) during the day, or how many days of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?
29	Clarification	Table ES-3; ES-30	"PMM-AQ-2 For pProjects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one-quarter mile (1,320 feet) of a sensitive land use, <u>project leads, as applicable and feasible, should</u> shall prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project should shall incorporate feasible mitigation measures to reduce air pollutant emissions."
30	Clarification	Table ES-3; ES-30-31	"PMM-BIO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, and species that meet the definition of "rare" as defined in CEQA Guidelines Section 15380(b)(2), <u>where applicable and feasible.</u> "
31	Clarification	Table ES-3; ES-32	"PMM-BIO-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, <u>where applicable and feasible.</u> Such measures may include the following or other comparable measures identified by the lead agency:"
32	Mitigation Measures: PMM-BIO-3: In-lieu fees vs in kind services	ES-34	Mitigation Measure PMM-BIO-3() states that wetlands compensatory mitigation can include "Contribution of in-kind in-lieu fees." Is this an error and perhaps should read "Contribution of in-kind services or in-lieu fees"? In-kind typically refers to the payment of goods or services, as opposed to monies.



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33	Clarification	Table ES-3; ES-34	"PMM-BIO-3 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible.</u> "
34	Clarification	Table ES-3; ES-35	"PMM-BIO-4 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible.</u> "
35	Mitigation Measures: PMM-BIO-4: Open space/nursery site areas	ES-37	<p>Mitigation Measure PMM-BIO-4(p) identifies that where an RTP/SCS or other regionally significant project has the "potential to impact other open space or nursery site areas," that compensatory coverage should be sought.</p> <p>The mitigation measure should clarify what is "other open space". Also, the reference to "nursery site areas" should be expanded to reference what type of nursery site area is governed by this mitigation measure. All plant nurseries, including commercial nurseries? And how would this address wildlife movement, which is the emphasis of the mitigation measure?</p>
36	Mitigation Measures: PMM-BIO-4: Corridor Redundancy	ES-38	<p>Mitigation Measure PMM-BIO-4(v) identifies that one comparable measure to address wildlife movement impacts, is to "Create corridor redundancy to help retain functional connectivity and resilience."</p> <p>The mitigation measure should include clarification on exactly what type of corridor redundancy is being recommended, to avoid confusion between a transportation corridor versus a wildlife or other corridor that the mitigation measure is addressing.</p>
37	Clarification	Table ES-3; ES-38	"PMM-BIO-5 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible.</u> "
38	Mitigation Measures: PMM-BIO-4: Tree Removal Timing	ES-39	<p>Mitigation Measure PMM-BIO-5(h) identifies that debris to be removed as a result of tree removal work should be done within two weeks of debris creation.</p> <p>Recommend that the timing also include the phrase "or as determined by the local jurisdiction", to allow for compliance with any local agency requirements or timing needs.</p>
39	Clarification	Table ES-3; ES-40	"PMM-BIO-6 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible.</u> "
40	Clarification	Table ES-3; ES-40	"PMM-CUL-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible.</u> "
41	Clarification	Table ES-3; ES-43	"PMM-CUL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and



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



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			existing homes and businesses, and if so, make the project impact and mitigation measure consistent in applicability.
51	Clarification	Table ES-3; ES-70	<p>“PMM-TRA-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the lead agency:</p> <p>☐ For future land use development projects, lead agencies <u>should</u>shall encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services”</p>
52	Mitigation Measures: PMM-TRA-2 FHWA Document Reference	ES-71	Mitigation Measure PMM-TRA-2 addresses the consideration of TDM strategies in land use and transportation projects and plans. Said mitigation measure references, as guidance, an FHWA 2012 desk reference. Is 2012 the most current iteration of the document, and if so, has the document been reviewed to determine if it is up-to-date and relevant, with current technologies, strategies and trends?
53	Clarification	Table ES-3; ES-71	“PMM-TRA-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, <u>where applicable and feasible</u> .”
54	Clarification	Table ES-3; ES-71	“PMM-TRA-3 <u>A lead agency for a project should, where applicable and feasible, prepare</u> Prepare a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction’s applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), and on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).”
55	Clarification	Table ES-3; ES-72	“PMM-TCR-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> .”
56	Clarification	Table ES-3; ES-73	“PMM-UTIL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.”
57	Mitigation Measures: PMM-UTIL-3	ES-75	Mitigation Measure PMM-UTIL-3 focuses on the reduction of solid waste. There are several references about developing opportunities to divert food waste from landfills. Perhaps there should be a reference to SB 1383, which



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			is already law, and focus the emphasis on strengthening versus developing opportunities to divert food waste? <ul style="list-style-type: none">• Think about removing J or rewording ordinance encouragement
58	Clarification	Map ES-1	<ul style="list-style-type: none">• Add page number• Add label for Orange County
59	Clarification	Map ES-2	<ul style="list-style-type: none">• Add page number• Add label for Orange County• Change source to SCAG• Map ES-2 illustrates 16 subregions in the Legend, but page ES-4 states there are 15 subregions in SCAG. Please review and correct inconsistency.• The legend color used for Orange County and SANBAG is almost identical. Is there any opportunity to change the color choice, especially since Orange County and San Bernardino County share a border?
60	Regional Location	ES-4; Map ES-2	EIR states that "the SCAG region consists of 15 subregional entities...". However, the referenced Map ES-2 illustrates 16 subregions. Please review and make consistent.
61	Clarification	Map ES-3	<ul style="list-style-type: none">• Add page number• Reduce thickness of city boundary lines
62	Clarification	Map ES-4	<ul style="list-style-type: none">• Add page number• Add year to title• Add note specifying land use categories were standardized by SCAG.
63	Clarification	p. ES-92; Map ES-5	<ul style="list-style-type: none">• Add page number• Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."
64	Clarification	Map ES-6	<ul style="list-style-type: none">• Add page number• Add year to title• Change legend's "Freeway" to "Freeway/Toll Road"
65	Clarification	Map ES-7	<ul style="list-style-type: none">• Add page number
66	Clarification	p. 1-2; paragraph 3; sentence 6	"...SCAG developed the LDX process to engage local <u>jurisdictions</u> partners and get information needed to fulfill state planning requirements."



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67	Correction	p. 1-8; paragraph 3; sentence 2	"... Drafting an EIR [...] necessarily involves some degree of forecasting (CEQA Guidelines Section 15144)." <ul style="list-style-type: none">• Insert the missing reference information
68	Clarification	p. 1-14; paragraph 2; sentence 1	"In addition, the 2024 PEIR identifies project-level mitigation measures for lead agencies to consider which they "can and should" <u>consider for adoption</u> adopt , as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes."
69	Clarification	p. 1-15; paragraph 2; sentence 5	"The <u>notices</u> notice are published in English, Spanish, Korean, Chinese, and Vietnamese languages. The Draft Connect SoCal 2024 <u>documents</u> are posted on the SCAG website and virtually distributed to libraries throughout the region, and physically distributed to libraries upon request."
70	Clarification	p. 1-18; Table 1-3	<ul style="list-style-type: none">• Add horizontal lines between rows to make information easier to read
71	Clarification	p. 2-6; paragraph 4; last sentence	"Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024." <ul style="list-style-type: none">• Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.
72	Clarification	p. 2-7; paragraph 3; last sentence	"As noted above, Connect SoCal 2024 utilized the LDX process to solicit land use and growth input directly from SCAG's local jurisdictions, and the Plan is the first RTP/SCS prepared by SCAG that did not modify <u>the requested</u> local data inputs <u>of housing and employment</u> ."
73	Correction	p. 2-8; bullet 3	"Orange County. Orange County covers an area of 799 <u>948</u> square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year." <ul style="list-style-type: none">• County of Orange Surveyor/Public Works' official information is that OC covers ~799 square miles from the coastline inland. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited. Density calculations using 948 should be redone using the 799 square miles that does not include the ocean area.• Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used
74	Clarification	p. 2-8; Section 2.4.2; bullet 1	"40 miles of heavy and light rail" <ul style="list-style-type: none">• There are only 40 miles of heavy & light rail in the region?
75	Clarification	p. 2-9; paragraph 1; sentence 4	"While 64 percent are single-family homes, 36 percent are multifamily homes such as condominiums, townhouses, and apartments." <ul style="list-style-type: none">• Townhomes are single-family attached homes as defined by the State of California DOF and the U.S. Census Bureau.• Perhaps add language that says "For the purposes of the RTP/SCS, the category of "multi-family" is a short-hand reference for housing



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			units other than single-family detached housing units. These include attached housing units, such as townhomes, which are single-family attached units; condominiums; and apartments.”
76	Clarification	p. 2-9; paragraph 2; sentence 4-5	<p>“... Much of the open space in the region has been left in its natural state, however many non-native species have transformed what was once native habitat. As of 2018, about half of California has been mapped and classified according to this standard; much of southern California has not yet been classified (CDFW 2023).”</p> <ul style="list-style-type: none"> Clarify “this standard”
77	Clarification	p. 2-9; paragraph 3;	<p>“More than 20 million acres of open space within the SCAG region is currently <u>conserved</u> protected under a Habitat Conservation Plan or Natural Community Conservation Plan or will be protected by a future conservation plan that is currently in its planning stages. Data from CDFW and USFWS show 31 plans with durations of 16–80 years providing conservation efforts nearly 3 million acres in the SCAG region. These plans identify and provide for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity.”</p> <ul style="list-style-type: none"> Please cite sources of data and clarify numbers and language; is this additive or exclusive?
78	Clarification	p. 2-12; footnote; sentence 4	<p>“SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements, and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024.”</p> <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.
79	Clarification	p. 2-13; paragraph 2; sentence 1	<p>“SCAG has the opportunity to analyze and address the inequities that the <u>public</u>, government, and planning profession have created by systemically driving and perpetuating societal differences along racial lines.”</p> <ul style="list-style-type: none"> Planners and government are not the only parties responsible
80	Clarification	p. 2-13; paragraph 3; last sentence	<p>“This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces and conserve the region’s resource areas.”</p> <ul style="list-style-type: none"> Clarify “if fully realized”
81	Clarification	p. 2-13; bullet 1; sentence 2	<p>“Transit Priority Areas (TPAs). ...Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands.”</p> <ul style="list-style-type: none"> Clarify how and explain the assets TPAs can reinforce
82	Clarification	Table 2-2;	<ul style="list-style-type: none"> All goals should have same language as in Connect SoCal main report.
83	Clarification	Table 2-2; p. 2-18	<p>“6. Support implementation of complete streets improvements in Priority Equity Communities*, and particularly with respect to Transportation Equity Zones*, to enhance mobility, safety, and access to opportunities.”</p> <ul style="list-style-type: none"> Missing footnote for *
84	Correction	Table 2-2; p. 2-19	<p>“15. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the</p>



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			existing transportation system instead of adding roadway capacity, <u>where possible</u> . 16. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network.” <ul style="list-style-type: none">Language is not consistent with Connect SoCal
85	Clarification	Table 2-2; p. 2-19	“22. Reduce <u>Eliminate</u> transportation-related fatalities and serious injuries on the regional multimodal transportation system.”
86	Addition	Table 2-2; p. 2-20	Add new 42. <u>Support a mix of housing types throughout the region; including single-family detached development, which can increase equity-building opportunities for all income levels.</u>
87	Correction	Table 2-2; p. 2-22	“73. Advance comprehensive systems-level planning of corridor/supply chain operational strategies <u>that is</u> , integrated with road and rail infrastructure, and inland port concepts.” <ul style="list-style-type: none">Reword to match Connect SoCal p. 120
88	Correction	Table 2-2; p. 2-22	“79. Promote an atmosphere <u>that</u> which allows for healthy competition and innovative solutions which are speed-driven , while remaining technologically neutral” <ul style="list-style-type: none">Reword to match Connect SoCal p. 120
89	Clarification	Table 2-2; p. 2-23	“89. Encourage the reduced use of cars by visitors to the region by working with state, county, and city agencies to highlight and increase access to <u>safe</u> alternative options, including transit, passenger rail, and active transportation.”
90	Clarification	Map 2-1	<ul style="list-style-type: none">Add page numberAdd label for Orange CountyChange source to SCAG
91	Clarification	Map 2-2	<ul style="list-style-type: none">Add page numberAdd label for Orange CountyChange source to SCAG
92	Clarification	Map 2-3	<ul style="list-style-type: none">Add page numberBus routes and freeways are hard to differentiate
93	Clarification	Map 2-5	<ul style="list-style-type: none">Add page numberAdd year to title
94	Clarification	Map 2-6	<ul style="list-style-type: none">Add page numberWhy only major airports?
95	Clarification	Map 2-7	<ul style="list-style-type: none">Add page numberAdd year to titleAdd note specifying land use categories were standardized by SCAG.
96	Clarification	p. 2-42 Map 2-8	<ul style="list-style-type: none">Add page numberAdd year to titleAdd language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-



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			binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."
97	Clarification	Map 2-9	<ul style="list-style-type: none">• Add page number• Add year to title
98	Clarification	Map 2-10	<ul style="list-style-type: none">• Add page number• Add year to title
99	Clarification	Map 2-11	<ul style="list-style-type: none">• Add page number• Add year to title
100	Clarification	Map 2-12	<ul style="list-style-type: none">• Add page number• Add city boundaries to legend
101	Clarification	p. 2-47	<u>"U.S. Census Bureau American Community Survey 2017 1-Year Estimates, American FactFinder. 2017. 2017 Population Estimates. https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml. Accessed July 29, 2019."</u>
102	Correction	p. 3-5; paragraph 5; sentence 3	<u>"The regional growth forecast process incorporates extensive input and data including the most up-to-date local land use information, policy responses, demographic..."</u>
103	Clarification	p. 3-5; footnote	<p>"SCAG's regional growth forecasting process emphasized the participation of local jurisdictions and other stakeholders. The Local Data Exchange (LDX) process was used to give local jurisdiction's jurisdictions the opportunity to provide input related to land use and the future growth of employment and households to ensure that the most updated information from local jurisdictions was gathered to link and align local planning with a regional plan that can meet federal and state requirements and reflect a regional vision. Therefore, LDX was a key component of allocation of growth across jurisdictions in the SCAG region with 67% of jurisdictions providing information as part of the LDX process. <u>The deadline for local jurisdiction in the LDX process was December 2022.</u>"</p> <ul style="list-style-type: none">• Who are the "other stakeholders"? Did the public or other groups have input into the growth forecast? Does this refer to the panel of experts?
104	Existing Conditions	3.8-3	<p>The draft EIR states that "By 1850, the world emitted a cumulative total of approximately 4.76 billion tons of CO2 and by 2019, the world emitted a cumulative total of approximately 1.39 trillion tons of CO2 (estimated from 1750 onward....").</p> <p>Is the reference to 1750 the Year 1750? Also, should there be a citation that identifies how this base level of GHG emissions (i.e., year 1750) was established and quantified?</p>



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105	Existing Conditions	3.8-7	<p>The draft EIR states "Furthermore, the global average temperature for July 2023 was the highest on record for the last 120,000 years where the months estimated to have been around 1.5 degrees Celsius warmer than the average for 1815 to 1900...".</p> <p>a) Is the reference to 120,000 years correct? b) The use of the word "months" seems to be an incorrect reference. Please review and correct.</p>
106	Existing Conditions	3.8-7	<p>The draft EIR states "The Safeguarding California Plan was updated in 2018 to present new policy recommendations and provide a road map of all the actions and next steps...".</p> <p>Is the Safeguarding California Plan supposed to be updated every three years? Has the State developed an updated list of policy recommendations and implementation actions that should also be referenced in this section? Or is the approach to keep the discussion to the 2018 California Plan, because of the emphasis on Existing Conditions?</p>
107	Existing Conditions: SCAG Region	3.8-10 3.8-57 3.8-59	<p>In the second paragraph to this section, please re-review and re-check the Table numbers, table titles, and percentage (for Imperial County assigned to transportation GHG emissions), and correct, as appropriate. For example, the title referenced in this paragraph for Table 3.8-7 does not match the title actually assigned to Table 3.8-7 on page 3.8-57. Also, there are references to county-level GHG data that are not in Table 3.8-7 (is it supposed to be Table 3.8-10 on page 3.8-59?). Further, there is a reference to Imperial County generating, in 2019, 1.7% of the region's total transportation GHG emissions, which is not illustrated in any applicable county table of data.</p>
108	Regulatory Framework: Orange County	3.8-42	<p>The section on Orange County's regulatory framework for GHG reductions cites a 2023 Orange County Register source on Orange County moving "forward with developing a county climate action plan to address ways the county could help slow climate change and mitigate the local effect."</p> <p>Please confirm and identify the agency/agencies in charge of developing an Orange County climate action plan.</p>
109	Table 3.8-6: Jurisdictions Addressing Climate Change	3.8-44	<p>Having two distinct listings of jurisdictions from distinct counties on the same page, with said listings extending into multiple pages, was initially confusing in Table 3.8-6.</p>
110	Transportation Emissions: OGV	3.8-58 3.8-59	<p>Please include the acronym OGV in the EIR Glossary.</p>
111	SB 743 and VMT Guidance	3.8-65	<p>This section of the draft EIR states "At the time of preparing this 2024 EIR it is unknown how CARB and the other state agencies, through statewide programs or in coordination with local and regional governments, would meet the identified higher VMT reductions."</p>



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			Please include a short summary of what the higher SB 743 VMT targets are, to prevent the reader from having to research and understand the degree of context.
112	Mitigation Measures: GHG	3.8-66 to 3.8-69	Please see comments, proposed revisions and edits from the draft EIR Executive Summary, Table ES-3: Summary of Project Impacts, Mitigation Measures and Residual Impacts, relating to the GHG mitigation measures (pages ES-47 through ES-50), and carry over to Chapter 3.
113	3.11.1: Environmental Setting Definitions: Recreation	3.11-2	Definition of "recreation". Please identify if recreation areas include both public and private-owned parks and open space areas. As an example, private parks and open space can satisfy local parks requirements for residential developments, with ownership of said private parks and open space by homeowner associations.
114	3.11.1: Environmental Setting Definitions: Subregion	3.11-2 Map ES-2 ES-4	Definition of "subregion". Map ES-2 illustrates 16 subregions in the map Legend, but page ES-4 (of the Executive Summary) and page 3.11-2 of this chapter state there are 15 subregions in the SCAG region. Please review and correct inconsistency.
115	3.11.1: Environmental Setting Definitions: Vacant Land Existing Land Uses	3.11-3	Definition of "vacant land" is described in this chapter as land that "is generally referred to land with no buildings on it." Please clarify if the designation of vacant land includes land with no buildings on it, but with improvements such as surface parking lots. This issue has come up in local jurisdiction review of parcel level existing land uses and how to appropriately classify such land uses. Perhaps the inclusion of the term "undeveloped" or "no improvements", as are used in the narrative on vacant lands on page 3.11-3, would be of benefit.
116	Clarification	p. 3.11-5; paragraph 1	"The SCAG region is composed of six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The Plan's policies and strategies encourage improvement in the jobs-housing balance by focusing new housing and employment in Priority Development Areas (PDAs). A general discussion of the land use patterns is provided for each of the six SCAG counties below <u>and is sourced from each County government's General Plan:</u> "
117	3.11.1: Environmental Setting Counties: Orange	3.11-5; paragraph 6	"Between 2000 and 2019, the total population of Orange County increased by 12.1 percent, which was slightly higher than the SCAG region increase of 14 percent. The <u>County of Orange's</u> General Plan assessed that Orange County would experience a steady but declining amount of land available for development." <ul style="list-style-type: none">• Please re-check the numbers. The percentages comparison and the conclusion do not match.
118	Clarification	p. 3.11-6	"San Bernardino. Between 2000 and 2019, the total county population increased by 27.2 percent (U.S. Census Bureau 2002; SCAG 2021, 2023a); well above the SCAG regional region increase of 14 percent (SCAG 2021, 2023a). Much of the development in San Bernardino has occurred on unincorporated county land. The <u>County of San Bernardino's</u> General Plan..."
119	3.11.1: Environmental Setting	3.11-6	In the discussion of Ventura County, this chapter states "Between 2000 and 2019, Ventura County's population growth increase of 12.8 percent was slightly higher than the SCAG region increase of 14 percent."



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	Counties: Ventura		<ul style="list-style-type: none">Please re-check the numbers. The percentages comparison and the conclusion do not match.
120	Clarification	p. 3.11-8; paragraph 2; sentence 6	<p>"City and county general plans must be consistent with each other. Local jurisdictions implement their general plans through zoning ordinances. Zoning ordinances provide a much greater level of detail including the general plan land use designations and such information as permitted uses, yard setbacks, and uses that would require a conditional use permit (Map 3.11-1, General Plan Land Use Designations, shows the general land use designations (consolidated for purposes of consistency and mapping) for the six SCAG member counties and 191 cities in the SCAG region)."</p> <ul style="list-style-type: none">"City and county general plans must be consistent with each other." <p>This statement is not accurate. Delete.</p>
121	Clarification	p. 3.11-8; paragraph 3&4	<p>"The land use elements of the county and city general plans within the SCAG region generally classify lands <u>into</u> in to 35 land use categories (Table 3.11-2, SCAG Region General Land Use Categories).</p> <p>According to <u>modeling results of the</u> SPM data, the Plan would add approximately 50,000 urbanized acres to the region by 2050 (SCAG 2023c)."</p>
122	3.11.1: Environmental Setting Existing Land Uses by County	3.11-8	<p>In the discussion of existing land uses by county, this chapter states "According to SPM data, the Plan would add approximately 50,000 urbanized acres to the region by 2050."</p> <p>To avoid any misinterpretation of the 50,000 acres comprising new acreage being added to the region, perhaps the verb "add" could be revised to explain that the Plan incorporates land use changes to existing acreage (i.e., through infill or redevelopment, in addition to greenfield development)?</p>
123	3.11.1: Environmental Setting Existing Land Uses by County Table 3.11-2	3.11-8; Table 3.11-2	<p>In the discussion of existing land uses by county, this chapter states "The 35 land uses noted in Table 3.11-2 are grouped into three Land Development Categories (LDCs) to describe the general conditions in a given area, including urban, compact and standard LDCs". In reviewing Table 3.11-2, there seems to be a mismatch between the narrative on page 3.11-8 and the presentation of information on Table 3.11-2. As an example, Table 3.11-2 seems to list 34 land uses. There also does not seem to be any correlation between LDC designations and Table 3.11-2, which is implied in the narrative. Perhaps clarify in the narrative on page 3.11-8 that the LDC grouping is a subsequent process.</p>
124	Clarification	3.11-10; paragraph 3	<p>"The majority of medium- and high-density housing in the region is found in the urban core of the region, in Downtown Los Angeles, East Los Angeles, the South Bay, and the "West Side" of Los Angeles. Large cities, such as Long Beach, Santa Ana, Glendale, Oxnard, and Pasadena, also have concentrations of high-density development in their downtown areas. Several beach communities, such as the Cities of Santa Monica, Manhattan Beach, Hermosa Beach, Redondo Beach, Huntington Beach, and Newport Beach, have high density close to the ocean."</p> <ul style="list-style-type: none">Define 'high-density'If density calculations were made using the Census Bureau geographic boundaries, which include ocean areas for coastal cities, the density calculations may need to be redone.



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125	Clarification	3.11-11; paragraph 3	<p><u>"Multifamily units—a term that SCAG uses to generally classify homes other than single-family detached housing units—are attached residences, apartments, condominiums, and also include townhouses, which are classified by the State and U.S. Census Bureau as single-family attached homes."</u></p>
126	Clarification	3.11-11; paragraph 5	<p><u>"Duplexes, Triplexes, and 2- or 3-Unit Condominiums and Townhouses. This category is composed of duplexes, triplexes, and 2- or 3-unit condominiums, which are all multi-family structures and townhouses—which are actually attached single-family units that are attached multifamily structures."</u></p>
127	Clarification	3.11-11; paragraph 8	<p><u>"Typically, low-rise apartments, and condominiums, and townhouses occur together in large contiguous areas since land use is restricted to multi-family zoned areas."</u></p> <ul style="list-style-type: none">• Townhomes are single-family housing units.
128	Correction	3.11-12; paragraphs 1 & 3	<p><u>"Medium-Rise Apartments and Condominiums. This category includes multi-family structures of three to four stories and greater than >18 units/acre...."</u></p> <p><u>High-Rise Apartments and Condominiums. This category includes multi-family structures of five stories or greater and greater than >18 units/acre."</u></p>
129	Clarification	3.11-14; paragraph 3	<p><u>"OPEN SPACE, RECREATION, AND AGRICULTURAL LAND USES..."</u></p> <p>In yet other instances, lands may be designated or zoned as open space but still allow for development of a single-family home. Lands evaluated as natural lands in the Plan are generally evaluated as wildlife habitat in Section 3.4, Biological Resources, and not agricultural lands. In general, in this 2024 PEIR, agricultural lands are farmlands, and natural lands provide valued habitat."</p> <ul style="list-style-type: none">• Some land that is currently used for agriculture is zoned for other purposes but is temporarily being used for agriculture and the long-term expectation is that the land will be developed for housing or commercial. Please clarify in the narrative whether land classification is by use or by zoning and update any calculations as applicable.
130	Clarification	3.11-16-17; Table 3.11-4	<p>Use full name of Source in tables instead of acronyms.</p> <p><u>"Source: California Coastal Commission CCC 2019"</u> and add link to source website</p>
131	Clarification	3.11-21; paragraph 4	<p><u>"The California Coastal Act constitutes the California Coastal Management Program for the purposes of the Federal Coastal Zone Management Act (California Coastal Act of 1976; PRC Section 30000 et seq.). The act established the California Coastal Commission (CCC), identified a designated California Coastal Zone, and established CCC's responsibility to include the preparation and ongoing oversight of a Coastal Plan for the protection and management of the Coastal Zone. Each local jurisdictional authority (city or county) with lands within the coastal zone is required to develop, and comply with, a coastal management plan. The Coastal Act requires that any person or public agency proposing development within the Coastal Zone obtain a Coastal Development Permit (CDP)..."</u></p>
132	Clarification	3.11-21; bullet 1	<p><u>"a) The project is in a transit priority area;"</u></p> <ul style="list-style-type: none">• List source and define transit priority area even if defined in a previous chapter



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133	3.11.1: Environmental Setting Sustainable Communities and Climate Protection Act	3.11-24; paragraph 2	<p>Page 3.11-24, second paragraph, discusses the interrelationship between RHNA and the regional transportation plan processes. This section states "The RHNA, which is developed after the regional transportation plan, must also allocate housing units within the region consistent with the forecasted regional development pattern included in the SCS."</p> <ul style="list-style-type: none">Is this an accurate statement relating to SCAG's RHNA and Connect SoCal planning processes?
134	Clarification	3.11-24; paragraph 2	<p>"Previously, the RHNA determination was based on population projections produced by DOF. SB 375 requires the determination to be based upon population projections by DOF and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted used in the regional transportation plan is within a range of <u>1.5 three</u> percent of the regional population forecast completed by DOF for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than <u>1.5 three</u> percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by DOF. <u>Though SCAG's total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG's population projections from the applicable 2020 Connect SoCal Plan for the 6th Cycle of RHNA.</u></p>
135	Mitigation Measures: SMM-LU-1	3.11-28	<p>Mitigation Measure SMM-LU-1 states that SCAG shall work with the region's county transportation commissions and Caltrans in the siting of new <u>transportation</u> facilities in residential areas, to minimize future impacts to established communities. Is there any need or value to also referencing the Transportation Corridor Agencies in this mitigation measure? Also recommend that <u>transportation</u> be added to the mitigation measure language, to confirm what is implied intent.</p>
136	Clarification	3.11-33; Map 3.11-1	<ul style="list-style-type: none">Add page numberSource year should be 2019 not 2016Add data year to titleAdd link to where land use definitions areExplain if these are the consolidated land use categories and not the original jurisdiction maps
137	Clarification	3.14-1; Bullet list	<p>"Employment: <u>Also known as "jobs", employment includes both wage and salary workers and self-employed workers. Paid, wage and salary</u> employment consists of full- and part-time employees, including salaried officers and executives of corporations, who were on the payroll in the pay period. Included are employees on sick leave, holidays, and vacations; not included are proprietors and partners of unincorporated businesses."</p>
138	Clarification	3.14-1; Bullet list	<p>"Housing unit: A house, an apartment or other group of rooms, or a single room are regarded as housing units when occupied or intended for occupancy as separate living quarters. <u>These include single-family and multi-</u></p>



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			<u>family units as well as accessory dwelling units (ADUs)</u> . Different jurisdictions have slightly different definitions of what constitutes a housing unit.”
139	Clarification	3.14-1; Bullet list	“Population: As used in this analysis, population is data available from the U.S. Census Bureau for the SCAG region for the period of 1900 through 2022 2019 and from the State Department of Finance, with population projections available from SCAG in 2023 for the projected population growth through 2050.”
140	Clarification	3.14-2; paragraph 2; sentence 5	“Historically, population within the SCAG region was heavily influenced by net migration, or the difference between people coming into an area (immigrating) and the people leaving an area (emigrating) as opposed to <u>natural the increase, which is the number of births over deaths</u> . However, since about 2000, net migration has slowed and has resulted in slower population growth across the SCAG”
141	Clarification	3.14-2; paragraph 3; sentence 3	“The change is largely attributed to four key factors: (1) lower birth rates (fewer children), (2) lower immigration rates (fewer immigrants, <u>both domestic and international</u>), (3) aging population (fewer at childbearing age), and (4) high housing costs (lack of housing) (SCAG 2023a).
142	Clarification	3.14-2; Table 3.14-1	Change rates in table to display in percentages instead of raw number, e.g., use 22.6% instead of 0.226 as seen in Table 3.14-7.
143	Clarification	3.14-3; paragraph 2; last sentence	“At a fundamental level, there is simply not enough housing for everyone who wants to live <u>on their own</u> in the state.”
144	Correction	3.14-4; Table 3.14-3 source	“Connect SoCal 2024 base year, based on 2020 U.S. Decennial decennial Census P.L. 94-171 Redistricting data <u>PL 94-redistricting</u> file and 2019 DOF E-5 estimates”
145	Correction	3.14-4; Table 3.14-4 source	<p>“4. U.S. Census Bureau bureau 2020, American Community Survey <u>2020</u> 1-year estimates, <u>Table table</u> B17001</p> <p>5. U.S. Census Bureau bureau 2021, American Community Survey <u>2021</u> 1-year estimates, <u>Table table</u> S1701</p> <p>Verify if these are rates (raw number instead of displaying as a percent) or if they are rates per another population number, e.g., per 1,000 people. If raw numbers, change rates in table to display in percentages instead of raw number, e.g., use 23.8% instead of 0.238 as seen in Table 3.14-7</p> <p>Update title and add notes as needed to clarify.</p>
146	Clarification	3.14-7 & 8; Tables 8-10	Ensure totals match data in main RTP report
147	Clarification	3.14-11; paragraph 3; sentence 2	“At the time of preliminary <u>Plan</u> forecast development (April 2022) only 12 of the region’s 197 jurisdictions had 6th cycle housing elements which had been adopted and certified by the state.”
148	Clarification	3.14-13; paragraph 2; last sentence	“In addition, decisions made regarding the building and expansion of transportation systems divided communities of color and primarily benefited <u>non-Hispanic White</u> white suburban commuters.”
149	Clarification	3.14-16; paragraph 2; sentence 3	“In accordance with SB 197, zoning must be updated to reflect the 6th cycle RHNA by October 2025.” <ul style="list-style-type: none">October 2025 date is inconsistent with other dates of October 2024 listed throughout documents



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			<ul style="list-style-type: none">Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.
150	Clarification	3.14-16; Table 3.14-11	<ul style="list-style-type: none">Title “Summary of Housing Goals by County <u>Governments</u> in the SCAG Region”Header: County and City Policies and Ordinances [Note: these are pulled from the Counties’ General Plans and not cities]Change listing of 6 counties to<ul style="list-style-type: none"><u>County of</u> Imperial<u>County of</u> Los Angeles<u>County of</u> Orange<u>County of</u> Riverside<u>County of</u> San Bernardino<u>County of</u> Ventura
151	Clarification	3.14-22; paragraph 2; sentence 2	“However, transit stations station are generally located in areas that are already developed <u>or</u> where growth is planned and desirable.”
152	Clarification	3.14-22; paragraph 4; sentence 1	“As discussed above and in Chapter 2, Project Description, the Plan’s forecasted forecast regional development pattern provides for a projected population distribution that could occur in 2050. The total SCAG region population is expected to increase by approximately 1.3 million persons by 2050. The Regional Planning Policies and Implementation Strategies included in the Plan would encourage growth in PDAs and <u>reduce</u> minimize growth in GRRAs.”
153	Clarification	3.14-22; paragraph 7; sentence 1	Please clarify if this is referring to accommodating growth in PDAs and if the housing reference is also to growth. Consider revising to: “Implementation of the Plan would accommodate <u>a majority 60.4 percent of the region’s future population growth in PDAs: 60.4 percent of the population growth, 61.2 percent of the household growth, region’s future housing units, and 64.8 percent of the future employment growth in PDAs (SCAG 2023d).</u> ”
154	Clarification	3.14-23	“SMM-POP-1 SCAG shall continue to facilitate collaboration forums, such as through SCAG’s <u>Working Housing Group</u> ...”
155	Clarification	3.14-24; paragraph 6; sentence 1	“In urban areas, redevelopment often has the potential to displace affordable housing and can disproportionately affect people of color, particularly <u>non-Hispanic Black</u> and <u>non-Hispanic Indigenous</u> populations.”
156	Clarification	3.14-28; Map 3.14-1	<ul style="list-style-type: none">Add page number
157	Clarification	3.14-29; Map 3.14-2	<ul style="list-style-type: none">Add page numberAdd language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the



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			neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."
158	Clarification	3.14-30; Map 3.14-3	<ul style="list-style-type: none">• Add page number• Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."
159	Clarification	4-5; paragraph 1; sentence 2	"As a result, Connect SoCal 2024 is SCAG's first RTP/SCS to not modify local data inputs <u>for housing and employment.</u> "
160	Clarification	4-6; paragraph 1; sentence 2	"Key components include a forecasted regional development pattern based on expert projection, existing planning documents, <u>and</u> regional policies, and review by local jurisdiction through the year 2050, as well as a transportation network including a list of transportation projects and investments from CTCs on their planned near-term and long-term projects."
161	Section 4.3.2: Plan Elements: Transportation Elements: Work from Home	4-7	This section discusses and defines Work from Home. Please clarify if SCAG's definition of Work from Home applies both to full-time and part-time employees in SCAG's activities-based, travel demand model. Also, is there any estimate of the percentage of Work from Home employees that is assumed in the SCAG modeling?
162	Section 4.4.1: Alternative 1: Transportation Element	4-9 ES-12	The Alternative 1 transportation network is described as including the first year of the previously conforming FTIP. However, in the Executive Summary of the Draft EIR, the Alternative 1 transportation network is defined as including the first two years of transportation projects in the previously-conforming RTP or FTIP. Please review and correct.
163	Section 4.5: Comparison of Alternatives: Alternative 1: Aesthetics	4-12	This section of the Alternative 1 analysis states that "The No Project Alternative would not include any transportation projects that could affect State Scenic Highways or vista points. Has there been a specific review of the Alternative 1 transportation project list to confirm this statement?"



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164	Section 4.5: Comparison of Alternatives: Alternative 1: Agriculture and Forestry Resources	4-13	<p>This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "The potential for conflicts with zoning land use designations, Williamson Act contracts, and/or other applicable regulations that protect agricultural and forestry resources and timberlands would also be less because fewer agricultural lands would be converted to nonagricultural uses than under the Plan."</p> <p>Please re-review and verify if this statement is correct. If all the EIR Alternatives share the identical growth projections in population, households and employment, and if the Plan emphasizes infill development and a lesser impact on greenfield development, how would the No Build Scenario have a lesser impact on agriculture lands conversion to developed uses?</p>
165	Clarification	4-14; paragraph 3; sentence 3	<p>"For example, Segment 1 is in El Centro on the I-8; under the Plan, the segment would experience a decrease in VMT from light- and medium-duty cars of approximately 1,400 as compared to the No Project; however, heavy-duty truck traffic is expected to increase by over 200 daily trips under the Plan as compared to the No Project scenario. Since the majority of DPM (<u>diesel particulate matter</u>) emissions and the associated health risk results from heavy-duty vehicles, the health risk would be greater in this segment under the Plan. The health risk under the Plan is anticipated to be less in most segments as compared to the No Project scenario. The total health risk summed across the analyzed segments under the Plan (1,553 in 1 million <u>people</u>) would be less than the No Project (1,575 in 1 million)."</p> <ul style="list-style-type: none">• Please clarify the 1,400 reference
166	Comparative Discussion of EIR Alternatives	4-17 4-19 4-24	<p>Especially within the same paragraph of EIR discussion, there are instances where the same EIR Alternative is given different terminology, which makes for a very confusing read for the reader to understand the differences, if any. As an example, on page 4-17 and page 4-24,, Alternative 1 is called the No Project Alternative, the No Plan, and the No Plan Alternative.</p> <p>Also, on page 4-19 and 4-24, the Plan is termed both The Plan and Connect SoCal 2024.</p> <p>It would be ideal if the same terminology could be used within the same paragraph to avoid initial confusion.</p>
167	Clarification	4-19; paragraph 4	SCAG Natural Lands Conservation Areas- what are these?
168	Clarification	4-21; paragraph 1	"Alternative would result in greater impacts related to the wasteful , inefficient, or unnecessary consumption of energy during construction activities and long-term operations and impacts would remain significant."
169	Clarification	4-21; paragraph 4	Add definition of "seiche" even if already included in previous chapter
170	Clarification	4-22; paragraph 4; sentence 4	"The same is true for existing requirements and regulations addressing potential safety hazards and excessive noise within an airport land use plan or within two miles of a public or public- use airport, so airport-related safety and noise impacts to people residing or working in the Plan area would be the same under this alternative."



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none">What is the difference between public and public-use airport?
171	Clarification	4-22; footnote & p. 4-35	"Airport Ground Support <u>Equipment</u> (GSE) sources"
172	Clarification	4-22; last paragraph; last sentence 4-36	"Therefore, the more dispersed land use pattern of this alternative and lack of transportation system improvements would result in greater impacts associated with emergency access <u>along with</u> and emergency response and evacuation plans, and impacts would be significant." Please clarify the listings within the sentence.
173	Section 4.5: Comparison of Alternatives: Alternative 1: Population and Housing	4-25	This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "the lack of large-scale transportation projects under this alternative would also reduce the potential" for right-of-way acquisition that would lead to potential displacement of existing housing and affected populations. Has the list of programmed FTIP projects in Alternative 1 been reviewed to confirm this statement?
174	Clarification	4-25; paragraph 2	"The No Project Alternative assumes a more dispersed growth pattern, which may result in less pressure to redevelop existing sites, <u>and therefore</u> and that are the result in induce direct population growth by encouraging new residential and commercial development within more rural or suburban settings where such growth may not have been planned. "
175	Section 4.5: Comparison of Alternatives: Alternative 1: Transportation	4-29	This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "impacts related to design hazards for transportation projects would be greater , as fewer transportation projects that meet current design standards would be constructed and the Plan's focus on safety would not be implemented. " Would this categorical statement be accurate? Is not safety still a requirement for the Connect SoCal 2020 projects that are programmed and included in Alternative 1?
176	Clarification	All pages; 4-31; Agriculture and Forestry Resources; e.g. 5-3	Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/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. Add notes to language and table or figures that indicate " not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming." Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
177	Clarification	4-34;	"This alternative would result in less fewer impacts related to the wasteful , inefficient, or unnecessary consumption of energy during construction activities and long-term operations."
178	Clarification	4-40; paragraph 6	"The performance comparison for the alternatives No-Project Alternatives and the Plan is included in the Connected SoCal 2025 Land Use and Community Technical Report."
179	Terminology	5-3 5-6	<p>Page 5-3, Air Quality section, references the "Southern California <i>Air Quality</i> Management District (SCAQMD). Please correct as the "<i>South Coast Air Quality</i> Management District.</p> <p>Page 5-6, Wildfire section, references the need to discourage development in PGAs. In the Glossary, a PGA is defined as "Peak Ground Acceleration." Should the reference be PDA (Priority Development Area)?</p>
180	Clarification	5-3	Agriculture and Forestry Resources section discusses land converted to non-agricultural use. Please clarify if the land is zoned for agriculture or being used temporarily with agriculture uses but zoned as another use.
181	Clarification	5-4	"Energy: Implementation of the Plan has the potential to result in wasteful , inefficient, or unnecessary energy consumption in the SCAG region."
182	Clarification	5-4	<p>"Greenhouse Gas Emissions (GHG): ...Furthermore, while GHG emissions are anticipated to decrease compared to existing conditions, they are not anticipated to be reduced sufficiently to meet the statewide GHG emissions reduction targets and GHG emissions resulting directly and indirectly from the Plan may result in significant and unavoidable impacts."</p> <ul style="list-style-type: none">• Please clarify the reference to decreasing emissions [as of when] compared to existing conditions.• Reword second part of sentence to clarify the state as a whole isn't meeting the state-level targets even though SCAG has met the state-prescribed target.
183	Clarification	5-8; Paragraph 2	<p>"However, construction activities related to transportation projects and land use development would nevertheless result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment and aggregate supply used in construction."</p> <ul style="list-style-type: none">• Clarify what "fuel oil" is.
184	Section 5.3: Growth Inducing Impacts	5-10	This section, paragraph 6, page 5-10, states that the Plan does not plan "...for anything more than nominal or by-right growth in rural areas...", in addition to more efficient, compact growth in existing developed areas. Please confirm that the received Local Input from SCAG jurisdictions confirms the statement of there being nominal or by-right growth in rural areas, in the Plan.
185	Clarification	5-11; paragraph 1; last sentence	"However, the improved accessibility from the Plan's transportation projects, transit investments, and land use strategies could also facilitate population and economic growth in areas of the region that are currently not developed, despite policies designed to <u>discourage</u> limit such development."



Table 3. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
8	General Comment	All pages	Extra commas throughout . . . Example, page 15, 2 nd paragraph, last sentence
9	Correction	p. 11	1 st paragraph, there appears to be an unnecessary quotation mark before “on airport property...”
10	Correction	p. 11	3 rd paragraph, second line, there appears to be an unnecessary parenthesis
11	Clarification	p. 12	2 nd paragraph, spell out Imperial County Airport (IPL)
12	Clarification	p. 20	3 rd paragraph. Should “Approximately 88 percent of travelers at LAX are O&D, and 22 percent are connecting passengers” be modified to add up to only 100%? Right now the total is 110%.
13	Clarification	p. 22	2 nd paragraph, last sentence add “Region” to “Impact of COVID-19 on air passenger and cargo activity in the SCAG”
14	Correction	p. 33	2 nd paragraph, extra parenthesis after NPIAS
15	Correction	p. 52	Last paragraph, delete “go” or “reach” in “economic impacts of airports go reach outside airport property”
16	Clarification	p. 58	3 rd bullet point, is there an extra “ground” in “airport ground airside ground”?
17	Correction	p. 70	Second sentence, delete “from” in “...employees will also access from the region’s airports...”
18	General Comment	p. 74	Should SCAG be studying airport operations? Or surface transportation? Should the aviation technical report conclude that SCAG will study surface transportation interplay with aviation, rather than conclude SCAG will study airport planning?



Table 4. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

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

Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All maps with growth forecast and development types data	Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone-(TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”
3	General Comment	All pages	Add “Technical Report” and “2024” to the header of each page
4	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION		
5	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.		
6	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.		
7	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.		
8	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.		
9	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible		
10	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.		
11	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/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 notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>		
12	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”		
13	Define	Add Glossary	Add glossary to technical report and define: ACS BLS DPH EDD GRRA	LDX LED NAICS Overcrowding/rates PDA People of color PopSyn	PUMS QWI racial/ethnic groups Sketch-planning sustainability p. 28 SWAA WFH



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Headship rates
14	Clarification	p. 5; paragraph 5; sentence 2	"Long-range growth in an entire region, or within individual neighborhoods, cannot be <u>specifically</u> predicted; however, probabilistically it is usually more likely to be nearer to the middle of a range than to the extremes."
15	Clarification	p. 7; paragraph 2; sentence 1	<p>"Between March and November 2022, SCAG staff initiated and completed one-on-one meetings with 164 of the region's 197 local jurisdictions to explain the methods and assumptions behind the preliminary small-area growth forecast, as well as to provide an opportunity to review, edit and approve <u>data the provided maps as well as and provide</u> jurisdiction and TAZ totals for households and employment in 2019, 2035, and 2050."</p> <p>Note: jurisdictions were not asked to approve maps—they were asked to approve data illustrated in map format.</p>
16	Clarification	p. 7; paragraph 3; sentence 2	Remove or provide definition of "overcrowding rates".
17	Clarification	p. 7; paragraph 4; sentence 2	"In order to meet the <u>greenhouse gas</u> targets <u>set by CARB</u> and implement the policies of Connect SoCal, these projections must be regionally balanced."
18	Clarification	p. 7; Table 2	<ul style="list-style-type: none">• Add grey section header bar above SCAG Region HIOC row.• Bold SCAG region total rows
19	Clarification	p. 8; paragraph 1; last sentence	<p>"These county-level projections provide a starting point for an even better balanced vision of 2050 which will require more policies, strategies, and investments in order to achieve."</p> <p>Please clarify sources and responsible parties of policies mentioned.</p>
20	Clarification	p. 8; paragraph 2; sentence 1	"According to Census 2020, which is the <u>most recent</u> official count of record, the population of the SCAG region as of April 1, 2020 was 18,824,382."
21	Clarification	p. 9; Figure 3	Change source wording to "U.S. Census Bureau Decennial Census P.L.94-171 downloaded from IPUMS NHGIS, University of Minnesota"
22	Clarification	p. 10; Figure 4	Change and vary color and format of lines to better differentiate between all.
23	Clarification	p. 10; paragraph 1	"While population decline is unprecedented <u>in California</u> , a substantial portion can..."
24	Define	p. 13; paragraph 3	Please provide definition of "people of color".
25	Clarification	p. 13; paragraph 3; sentences 2-3	"Rooted in historically and spatially embedded inequities, indicators such as household overcrowding and exposure to pollutants are typically higher for people of color; because . Because of the markedly younger age structure for people of color, <u>more</u> children will <u>also</u> be disproportionately impacted by this regional inequity ."
26	Clarification	p. 13; paragraph 4; sentence 2	"The groups whose share of the region are projected to grow by 2050 are (in descending order) <u>non-Hispanic Asian</u> , <u>non-Hispanic Multiracial</u> , <u>non-Hispanic Native Hawaiian/Pacific Islander</u> , and <u>Hispanic/Latino</u> (Table 45)."
27	Correction	p. 14; Figure 3.1.3	Shading of Baby Boomers should be much darker shade of blue or white/hollow.



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
28	Clarification	p. 15; paragraph 2; sentence 2	"This trend is nonlinear over the projection period <u>horizon</u> . By 2035, Baby Boomers will be ages 75 and older, Generation X will be at or approaching <u>their senior years retirement age (65 years+)</u> , and Millennials and Gen Z will be in prime working age <u>(16-64 years)</u> but both will have aged out of prime childbearing age <u>(generally 15-44 years)</u> ."
29	Clarification	p. 15; paragraph 3; last sentence	"By 2022 regional employment had also matched its 2019 pre-COVID peak—which was 447,000 jobs greater than at the 2016 base year of the last Connect SoCal plan <u>(Figure Table 7)</u> ."
30	Clarification	p. 15; Figure 6	<ul style="list-style-type: none">• Add descriptors of "Housing Units" and "Household Size" to vertical/Y axis on Figure 6.• Lighten color for Single-Family Units as it is difficult to differentiate.• Change title "Figure 6. New Housing Units <u>Permitted</u> and Average Household Size, SCAG Region, 2000-2022"• Change source "Source: <u>CA DOF E-5 and Permits: Construction Industry Research Board New Units from Permits. Household Size: CA DOF E-5 January 1 Estimates.</u> *2019 household size uses SCAG Growth Forecast in lieu of DOF to benchmark to Census 2020.
31	Clarification	p. 16; table 5	Define "headship by age".
32	Clarification	p. 16; paragraph 2; last sentence	"Due to aging alone, the number of households would be expected to increase by more than 26 percent, compared with 11 percent population <u>overall growth</u> ."
33	Clarification	p. 16; paragraph 4	"Household sizes tend to increase in the years following low housing production. Housing production was especially low over 2008-2013 as a result of the Great Recession—household sizes plateaued at around 3.1 and began to decline precipitously thereafter. This is related to the population growth slowdown coupled with relatively robust housing production, in addition to new Census 2020 data indicating more housing units in the region than were previously known to exist— <u>likely due to better canvassing of neighborhoods and identification of new or non-permitted structures and conversions</u> ."
34	Clarification	p. 16; paragraph 6; sentence 2 sentence 3	<p>"The 53,745 new units <u>permitted</u> in the region in 2022 reflect a higher number of new units than at any single year since 2006. <u>The higher number of units permitted is due in part to the increased in These data likely undercount</u> accessory dwelling unit (ADU) production. <u>A—a newly available data series from the Department of Housing and Community Development show a rapid rise of ADUs in the region in recent years and over 11,000 ADUs in 2021. This suggests that total new unit construction in recent years is likely even higher than shown in Figure 6.</u>"</p> <ul style="list-style-type: none">• Please clarify if 53,745 new units are referring to the number of units permitted or units completed. If using CIRB data, it is likely permits issued not units that completed construction.• Why would the data undercount ADUs and why is new unit construction higher? Is this referring to permitting or completed units or legal/permitted units vs. non-permitted units?• Is CIRB is questioning whether jurisdictions are reporting permits for new ADUs and permits for legalizing non-permitted ADUs?



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Correction	p. 18; Figure 8; paragraph 1 sentence 2	<p>"Between 2016 and 2019, employment was growing and the P:E ratio declined (Figure 78-B)."</p> <p>Recommend relabeling Figure 8 to Figure 8-A and Figure 8-B.</p>
36	Correction	p. 20; paragraph 1	<p>"Since 2000, SCAG region <u>regional</u> employment in the following four sectors..."</p>
37	Correction	p. 21; paragraph 2	<p>"In constant 2022 dollars, the median wage in the SCAG region was \$23.23 in 2002, \$22.88 in 2012, and \$22.87 in 2022. Table 87 summarizes the wage ranges for each category."</p>
38	Clarification	p. 22; paragraph 1 sentence 3	<p>"Although the region's economy recovered quickly from the COVID recession, ...</p> <ul style="list-style-type: none">• Please clarify how recovery is defined--# of jobs? # of businesses? Unemployment rate? Many businesses closed permanently. <p>In 2021, the share of workers working from home shot up to over 19 percent. This trend has stabilized nationally, with approximately 20 percent of U.S. workers able to work from home <u>for all or a portion of their work week</u> (see Kane, Moreno, and Myers 2022)."</p>
39	Clarification	p. 23; paragraph 3; sentence 3	<p>"This model computes population at a future point in time by adding to the existing <u>residential</u> population <u>to</u> the number of group quarters population, births, and in-migrants during a projection period and subtracting the number of deaths and out-migrants."</p>
40	Correction	p. 26; paragraph 2; sentence 2	<p>"Regional totals by 2-digit NAICS sector are provided at the SCAG region level for 2019 and 2050 (Table 67)."</p>
41	Clarification	p. 27; paragraph 1; sentence 3	<p>"As such, the projection does not reflect a build-out scenario <u>of all general plans throughout the region those some areas may reach first-stage build out or build out of a general plan's capacity</u>."</p>
42	Clarification	p. 27; paragraph 1; sentence 4	<p>"Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a remaining physical capacity of roughly 8.2 million housing units—several times higher than anticipated household growth—but <u>for these additional units to be realized, the existing structures would have to be demolished and replaced with higher density developments</u>."</p> <ul style="list-style-type: none">• The 'remaining physical capacity' is only capable of coming to fruition if the existing structures are demolished and replaced.
43	Clarification	p. 27; paragraph 3; sentence 4	<p>"The regional growth vision combines an allocation process <u>rooted in</u> based on Connect SoCal 2020 policies and sustainable growth strategies with a Local Data Exchange <u>process</u> to integrate local <u>information and</u> insights and improve accuracy."</p>
44	Clarification	p. 27; paragraph 4	<p>"For the purposes of the <u>preliminary growth forecast and forecasted regional development pattern</u> growth vision, PDAs are areas within the SCAG Region where future growth can be located in order to help the region reach mobility or environmental goals."</p>
45	Clarification	p. 27; paragraph 4	<p>"As such, the regional growth vision aims to increase resilience within the region's built systems by taking advantage of existing infrastructure, social system by promoting complete communities, economic systems by promoting proximity to jobs, and natural systems by mitigating growth in hazardous or sensitive areas."</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Should 'social system' be plural and what social system/s is being referred to?
46	Clarification	p. 28; paragraph 4	"This step improved forecast accuracy by linking it to <u>entitlements and</u> likely development sites while also providing an avenue to consider regional strategies and targets in local plans."
47	Clarification	p. 28; paragraph 4; sentence 2	"Unlike prior regional plans in which the locally-reviewed employment projection increased while the household projection decreased, local jurisdictions' traditional optimism about employment growth was not only matched but was substantially exceeded by optimism about future housing production." <ul style="list-style-type: none">Reword sentence. There are more entitled housing projects and units that are now included in the 2024 RTP; the higher household projection is not just due to optimism.
48	Correction	p. 29; paragraph 1	Change all instances of "PL-94 171" to "P.L. 94-171 Redistricting Data"
49	Clarification	p. 31; paragraph 1; sentence 4	"PUMS data is built by the Census Bureau <u>bureau</u> from hundreds of individual householders' and associated household members' responses to ACS survey questions." <ul style="list-style-type: none">Only hundreds of people responded to the PUMS/ACS survey? Clarify if these are hundreds of questions answered by individual householders or hundreds of householders answering questions.
50	Clarification	p. 33 Table 12	Add "(July)" to title to clarify these are July totals.
51	Clarification	p. 34; paragraph 3	"The population's age structure and racial/ethnic makeup are expected to continue <u>their current, gradual pattern of change seen to change in ways that they have been gradually changing</u> in prior decades (Table 5)."
52	Clarification	p. 35; paragraph 1; sentence 3	"While the non-White <u>racial/ethnic</u> populations other than non-Hispanic <u>White</u> <u>are</u> is younger, the slower projected rate of total population growth means that most racial/ethnic groups would not see as dramatic share changes as they did in the last thirty years. The largest increases are expected in the <u>non-Hispanic</u> Asian and <u>non-Hispanic</u> two-or-more races populations."
53	Clarification	p. 35; paragraph 6; sentence 2+	"The top three growth sectors during this time period, in terms of jobs added, are Health Care and Social Assistance sector adding 415,000 thousand jobs, Construction sector adding 139,000 thousand jobs, and Accommodation and Food Service adding 106,000 thousand jobs. Job growth in these three sectors make up half of the projected overall job growth for the region. Sectors where a decrease in jobs is projected between 2022 and 2050 are Finance and Insurance sector of 32,000 thousand jobs and a decrease of 16,000 thousand jobs in the Administrative and Support and Waste Services sectors."
54	Clarification	p. 45; paragraph 6; sentence 2	"The Local Data Exchange (<u>LDX</u>) process allowed SCAG to harmonize high-level trends with bottom-up community visions <u>and entitled projects</u> ."
55	Clarification	p. 45; paragraph 3	5.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency Replace section language and corresponding footnote—removing footnote—with the following language: "In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target,



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024's TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities' general plans; and they do not conform to jurisdictions' current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level.</p> <p>SCAG's forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region's ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG's projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project's or plan's general consistency and overall alignment with Connect SoCal.</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>For example, local jurisdictions' plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG's TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction's approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production's contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p>Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project's eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA)."</p>
56	Clarification	p. 46; paragraph 1	"More small households will form as overcrowding pressures ease, particularly during the first half of the Plan period horizon."
57	Clarification	p. 46; paragraph 3	"While the region showed resilience in the recent recovery from the COVID Covid-19 pandemic-related economic downturn , the pandemic hastened the acceptance of remote work and adoption of technologies that minimize human interaction or that automate work."
58	Clarification	p. 48; Map 2 p. 49; Map 3 p. 51; Map 5	Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
		p. 52; Map 6 p. 53; Map 7	analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."

Table 6. ECONOMIC IMPACT ANALYSIS TECHNICAL REPORT COMMENTS

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



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>
11	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
12	General Comment	All pages	Add “2024 Technical Report” to the header of each page
13	Clarification	p. 2; paragraph 2	“In 2023, the economic impacts of Connect SoCal 2024 on the <u>SCAG-region</u> SCAG region economy are at least as important, if not more. The SCAG region is in a similar situation recovering from the economic shock of the <u>response to the</u> COVID-19 pandemic, which upended nearly every aspect of the regional (and global) economy. COVID-19 had unprecedented impacts on the labor market. For example, pandemic-induced workplace closures drastically changed commuting patterns and employment locations. The pandemic <u>response</u> accelerated the decades-long increasing trend of remote and hybrid work, and because of pandemic-induced technological and cultural change, is likely to persist into the foreseeable future (Barrero, Bloom, and David 2023).”
14	Clarification	p. 2; paragraph 3; sentence 2	“The SCAG region has proven resilient in its recovery from the short but sharp COVID-19 recession. Connect SoCal 2024 investments, policies, and strategies strive to be more than the sum of their parts and capture synergies for the Plan. The intent is to fulfill the Plan’s vision of a healthy, prosperous, accessible, and connected region for a more resilient and equitable future ⁱ . Connect SoCal 2024 adds important emerging priorities for the region: a plan that fosters regional resilience, equitable and inclusive economic growth for all <u>SCAG-region</u> SCAG region residents.” <ul style="list-style-type: none">• Use footnotes instead of the single endnote in the document
15	Correction	p. 2; paragraph 5; sentence 2	“Connect SoCal 2024 details <u>SCAG-region</u> SCAG region transportation spending exceeding \$413 billion...”
16	Clarification	p. 3; paragraph 2	“Achieving the Plan’s promise of economic growth requires us to recognize that the region faces significant income inequality. For example, in 2021, in the SCAG region, <ul style="list-style-type: none">• Hispanic workers earned 56 percent of White worker wages,• Black workers earned 72 percent of White worker wages, and• Women earned 81 percent of men’s wages. (American Community Survey, 2021)”



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> Is this using median or average wages? Are the comparisons controlled for years or experience, education or any other factors?
17	Clarification	p. 3; second set of bullet points	<p>"9.7 percent of the region's households lived in overcrowded housing compared to 7.0 percent for the rest of California and 3.4 percent for the U.S., and</p> <ul style="list-style-type: none"> Housing costs overburdened 45 percent of the region's households" <ul style="list-style-type: none"> Please define 'overcrowded' and include source Please define 'overburdened' and include source
18	Clarification	p. 5; paragraph 4; sentences 1-2	<p>"A mix of transportation projects is planned in the six SCAG counties over the 26-year model timeframe. Of the total Connect SoCal 2024 expenditures exceeding \$413 billion (constant 2023 dollars)."</p> <ul style="list-style-type: none"> Second sentence is incomplete
19	Clarification	p. 11; paragraph 2; sentence 2	<p>"Under the Plan and incorporating the network efficiency gains would increase GDP by \$48 billion (2023 constant dollars) annually, on average."</p> <ul style="list-style-type: none"> Sentence structure is awkward. Reword for clarity.
20	Clarification	p. 14; paragraph 1; last sentence	<p>"However, the federal government and California agencies such as CARB and CalTrans rely on the SC-GHG based on the work of the Interagency Working Group on Group the Social Cost of Greenhouse Gases Gases ("IWG"). Therefore, for our analysis, we utilized adopt the IWG's IWG SC-GHG."</p>
21	Clarification	p. 14; paragraph 1; sentence 1	<p>"The IWG is a group of scientists convened in 2009 by the <u>federal</u> Council of Economic Advisers and the Office of Management and Budget...</p>
		last sentence	<p>However, some damages are difficult to quantify and <u>are</u> omitted from the SC-GHG models, including impacts from increased wildfire..."</p>
22	Clarification	p. 16; paragraph 1; sentence 1	<p>"In addition to <u>the</u> co-benefit of reduced GHG emissions, vibrant, multi-modal places foster increased physical..."</p>
23	Clarification	p. 17; Table 6	<p>Table source: cite original data sources instead of other tables in the report so the table can be extracted and serve as standalone information.</p>
24	Clarification	p. 17; paragraph 1; sentence 2	<p>"However, the SCAG Regional Council adopted the Inclusive Economic Recovery Strategy in July 2021 and, with a grant from the State of California, started implementing strategies for equitable and inclusive economic growth (see Chapter 3 of the <u>2024 Connect SoCal report</u> Main Book)—specifically focusing on racial disparities."</p>
25	Clarification	p. 17; paragraph 1; sentence 2	<p>"Figure 3 shows that, on average <u>and not controlling for factors such as field of work, years of experience, or education</u>, women earned 81 percent of what men earned in the SCAG region in 2021. <u>Non-Hispanic</u> Black workers earned 72 percent, and Hispanic workers earned 56 percent of <u>non-Hispanic White, non-Hispanic</u> workers' earnings in the SCAG region in 2021."</p>
26	Clarification	p. 18; Figure 3	<p>Change Title: " Percent of <u>Non-Hispanic</u> White Worker Wages"</p> <p>Update categories to</p> <ul style="list-style-type: none"> <u>Non-Hispanic</u> White <u>Non-Hispanic</u> Black/AA Hispanic <u>Non-Hispanic</u> Nat Am <u>Non-Hispanic</u> Asian/PI



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Other <u>Non-Hispanic</u> “Notes: Based on 2021 American Community Survey 1-Year PUMS Sample. Includes wage and salary workers in the labor force, age 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic <u>or Latino</u> .”
27	Clarification	p. 19; paragraph 2; sentence 2	“For illustrative purposes, assuming Assuming that this gain in GDP is equally distributed across industries, we can infer that the economic growth from Connect SoCal 2024 transportation investments we computed in Section 3.”
28	Clarification	p. 18; Figure 3	“Notes: Based on data from the 2021 American Community Survey PUMS 1-Year Sample. Includes wage and salary workers in the labor force aged 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic <u>or Latino</u> . SCAG region GDP estimated at \$1.4 trillion in 2021 (REMI).”

Table 7. EQUITY ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
7	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
8	Table 1: Summary of Performance Measures	p. 4 – 8; Table 1	In the Table 1: Summary of Analysis column, it would be helpful to the reader if the condition(s) reported for all the performance measures, are identified as a condition applicable to either an Existing or Plan timeframe. The approach used in Rail-Related Impacts (page 6) is an excellent approach in distinguishing between Base Year and the Plan. Others are unclear, such as Share of Transportation Usage (page 4), and Bicycle and Pedestrian Collisions (page 5).



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
9	Table 1: Summary of Performance Measures: Impacts From Mileage-Based User Fees	p. 8; Table 1	<p>The Summary of Analysis for the "Impacts from Mileage-Based User Fees" states that ".... it is crucial to ensure user fee programs are designed equitable, to insure that vulnerable communities experience the benefits of road pricing without regressive financial impacts."</p> <p>Is there an associated policy recommendation to support this conclusion that should be referenced? In reviewing the Plan Strategies (Section 3.4: Plan Fulfillment), do any of the Regional Planning Policies incorporate this implementation finding? If not, should there be such a policy? The one policy that links closest to the issue is the Funding the System/User Pricing Strategy that states "Study and pilot transportation user-fee programs and mitigation measures that increase equitable mobility." Does "equitable mobility" clearly address tackling regressive financial impacts of any road pricing program to vulnerable communities?</p>
10	4. Analytical Approach: 4.1 Outreach Efforts Not in Priority Equity Communities	p. 17	<p>There is a subsection bullet listing of what appears to be outreach workshop participant input of what should not be designated as Priority Equity Communities. It would help the reader if the bullet listing could be prefaced with an introductory sentence to provide context, such as "Workshop participants further identified several populations that should not be considered when analyzing equity. These include:" [if this is the correct context]</p>
11	Table 3: Priority Population Descriptions Limited Vehicle and Transit Population	p. 21	<p>Table 3 includes a "Limited Vehicle and Transit Population" priority population, and defines this population as "Households with more members than vehicles owned that are not within a census tract that intersects with a High-Quality Transit Corridor." Please clarify if the definition applies to "members <u>of driving age.</u>"</p>
12	Figure 1: Population in Priority Equity Communities by County	p. 22	<p>It would be helpful if Figure 1 also includes a SCAG Region bar of the regional percentage of Priority Equity Population of 48.6%, to provide the reader with immediate visual context of how each county percentage compares to the regional percentage, and avoid having the reader to refer to the preceding paragraph for the context.</p>
13	4.4 Impact Assessment	p. 28	<p>This section of the Technical Report states that "As described in the Main Book, SCAG conducts a 'Plan' vs 'No Plan' (or Baseline) analysis which compares how the region would perform with and without implementation of <i>Connect SoCal</i>."</p> <p>Please clarify if the reference to <i>Connect SoCal</i> is Connect SoCal 2020 or Connect SoCal 2024, since the use of the phrase has been used in SCAG documents to refer to both the 2020 and the 2024 plan.</p>
14	5.1 Comparison of Existing Conditions in the Region and in PECs: Asian population	p. 30-31 Table 7	<p>The technical report states that "In contrast, over 60 percent of the region's Hispanic/Latino population Asian population and Native Hawaiian/Pacific Islanders were in Priority Equity Communities." This data does not match with the data in Table 7. Specifically, Table 7 illustrates that the Asian population is at 44.2%. If the Table 7 data is correct, the narrative should delete the reference to Asian populations.</p>
15	5.1 Comparison of Existing Conditions in the	p. 30	<p>The technical report states that the average household size in Priority Equity Communities is larger than the region. Is there some comparison data that can be provided? This would be helpful, as there is then a</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
	Region and in PECs: Average HH Size		subsequent sentence that states <u>only</u> 46.3% of the region's household were in Priority Equity Communities, as compared to 48.6 percent of the total regional population share. Since households are all the members living in a housing unit, is this comparison of value?
16	6. Analysis: Mobility Vehicle Ownership	p. 37 & 38 Table 6	The technical report, page 37, last paragraph, states that "Figure 6 shows the percentage of householders that do not own an automobile. Almost seven percent of all householders within the SCAG region, and nine percent of householders of color, do not have access to or own a vehicle." Technically, Figure 6 does not illustrate that nine percent of householders of color do not have access to or own a vehicle. Was this an average percentage that was calculated from the raw numbers?
17	6.1 Share of Transportation Usage System	p. 40 & 41 Table 10	Page 40 of the technical report, last paragraph, states that "Black travelers had the second highest share of bus trips at 18.9%, a rate three times the regional usage, the highest usage rate compared to other racial/ethnic groups." There are some internal inconsistencies within the sentence and with the information on Table 10. a) The sentence makes reference to Black travelers having both the second highest share of bus trips as well as the highest usage rate. Based on the information in Table 10, it appears that the Hispanic/Latino population has the highest bus transit usage. b) If the regional share of bus usage is 2.3%, according to Table 10, how did the report calculate that Black travelers use bus transit at a rate of three times the regional usage? Seems to be much higher than three times.
18	6.2 Travel Time and Travel Distance Savings 6.22 Results	p. 41 & 42 Figure 7 p. 43	The Technical Report, page 41, last paragraph, states that "As shown in Figure 7, people of color experience longer travel times and distances using public transportation than auto..." and then continues with certain populations have longer travel time distances than other populations. Page 43: Results, third paragraph, continues to identify comparisons by race and ethnicity for public transportation. a) In reviewing the data on the referenced Figure 7, is the "Bus, Rail, Taxi or Ferry" category for commute times the same as "public transportation"? If that is correct, please also label as "Public Transportation: Bus, Rail, Taxi or Ferry." b) In reviewing the data on the referenced Figure 7, is the "Car or Motorcycle" category for commute times the same as "auto"? If that is correct, please also label as "Auto" so the narrative matches the Figure. c) If Public Transportation represents those four categories: Bus/Rail/Taxi/Ferry, the narrative/conclusions on pages 41 and 43 do not seem to match up with the data in Figure 7. Please re-review and appropriately correct.
19	6.3 Access to Everyday Destinations: Travel Cost Threshold	p. 52	The Equity Technical Report identifies that it uses a "Travel Cost Threshold" as a metric to measure access to destinations. The narrative on page 52 would benefit from a definition and explanation of a travel cost threshold, to set the context for the information in Table 11: Survey of Metrics for Access to Everyday Destinations.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	7. Analysis: Communities	p. 77 & 78 Figure 24	The narrative on page 77, last paragraph, states that Figure 24 (on page 78) identifies households without broadband access. Further, that Black households (4.3%) are most likely to not own a computer. When looking at the percentages in the referenced Figure 24, the figure is labeled as "people living in households". Please clarify if the percentages shown in Figure 24 are the number of households (which can be occupied by more than one person), or the percentage of the total population living in those households (i.e., number of households multiplied by an average population per unit factor).
21	7.3.2 Rail-Related Impacts Results	p. 96	<p>The conclusion on rail-related impacts seems to be vague on explicitly explaining the impacts of populations living proximate to railroads and railyards between Baseline and the Plan (e.g., "SCAG anticipates nominal plan impact or small differences between the Baseline and Plan scenarios, and that population changes would generally follow that of the SCAG region.")</p> <p>From an equity perspective, does this section address if the existing Baseline condition is a problem and needs to be addressed, especially if the conclusion is that there will be no significant change with implementation of the Plan?</p>
22	9.2.2 Investments vs Benefits: Results	p. 135 Figure 43	The technical report identifies that Figure 43 illustrates that the Connect SoCal 2024 investments in projects most used by Hispanic/Latino and Asian populations are lower compared to people of other races and ethnicities. Is this an equity issue that warrants greater discussion? Leaves the reader hanging.
23	9.4 Impacts from Mileage-Based User Fee 10. Equity Resources for Action Toolbox: 10.4.5 Road Pricing Programs	p. 142 p. 171	<p>The last paragraph on page 142 states that a Community Advisory Committee "expressed skepticism about road pricing as a pathway to more equitable transportation." This needs to be expanded and summarized as to the concerns expressed by the Community Advisory Committee. If there is skepticism to the equity of road pricing, the technical report should flush out what the concerns were, and whether the three recommended bullet points for pricing-related advocacy, effectively eliminates the fundamental issue or if it still remains.</p> <p>This issue then carries over into the Equity Toolbox: 10.4.5 Road Pricing Programs, which recommends that local agencies and groups "Adjust mitigation of negative impacts on vulnerable communities to reflect the specific impacts of pricing programs and local conditions." This is very vague and unclear and warrants expansion and context narrative.</p>

Table 8. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

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



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
#	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.

Table 9. HOUSING TECHNICAL REPORT COMMENTS

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



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>
10	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
11	General Comment	All pages	Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White...
12	Clarification	p. 1; paragraph 3; last sentence	“This report focuses on housing need and strategies that can support housing production and is complemented by the Land Use and Communities Technical Report which guides where and how development, including housing, may should occur in the region in <u>a way that is in</u> alignment with Connect SoCal 2024.”
13	Clarification	p. 1; paragraph 4 p. 2 1. Executive Summary Existing Housing Need 2. Why Housing Matters	Page 1, fourth paragraph, discusses the current housing crisis and includes the statement that “A shortfall of housing to meet the needs of the SCAG region have created issues such as cost-burden and overcrowded households.” As has been discussed during the 6th cycle RHNA process, one factor for the significant increase in the SCAG region’s 6th cycle housing need number – as determined by State HCD – is a shortfall of housing to meet the housing needs of the <u>existing</u> population. This existing housing need number was then added to State HCD’s calculation of the region’s future housing need for future population for the State’s 6th RHNA cycle. A discussion and clarification of existing housing need is recommended to be added to the Executive Summary and to Section 2: Why Housing Matters, to enable the reader to understand why there is a backlog of housing need.
14	Clarification	p. 1; paragraph 5 1. Executive Summary Barriers to Housing Production	Page 1, paragraph 5, discusses barriers to housing production, which include “lack of resources, community opposition, increasing construction costs, and the fiscalization of land use...”. a) For the layperson, an explanation of “fiscalization of land use” would be recommended. b) Also, other factors that challenge housing production include: insufficient funding that can be provided to developers, to help subsidize the cost of building affordable housing units, especially with the



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			elimination of state redevelopment funds; and, conflicting state requirements over housing production versus coastal lands protection on lands governed by the California Coastal Commission. While the sixth paragraph states that "Funding is available from the State to implement plans and projects at the regional and local levels," this sentence downplays the extent of funding needed to assist in housing production.
15	Clarification	p. 1; paragraph 6; last sentence	"Long term SCAG implementation strategies include providing technical assistance to housing element implementation, aligning housing-supportive infrastructure, and continuing its outreach and education efforts." <ul style="list-style-type: none">What is 'aligning housing-supportive infrastructure'?
16	Clarification	p. 2; paragraph 3; sentence 2	"However, while its core function was to insure home mortgage loans made by banks and private lenders, the FHA refused to insure mortgages in Black neighborhoods, often forcing them to move into urban housing projects and <u>rendering them</u> unable to build generational wealth that accompanies homeownership."
17	Clarification	p. 2; paragraph 5; sentence 2	"Even in neighborhoods where people of color found housing, <u>some</u> urban renewal policies destroyed <u>some</u> existing communities and displaced their residents."
18	Clarification	p. 2; paragraph 6; sentence 1	"Today, the quantitative impacts of the housing crisis such as overcrowding, cost-burden, and <u>low</u> home ownership, disproportionately burden communities of color."
19	Clarification	p. 3; paragraph 2 2. Why Housing Matters	The last paragraph of the "Why Housing Matters" section states that the Technical Report does not specifically define a quantitative threshold for what constitutes affordable housing. Nonetheless, there should be an additional sentence that identifies that the SCAG region jurisdictions, as a whole, must plan for more than 40% of its RHNA housing to be affordable to Extremely Very Low, Very-Low and Low Income households, per the 6th cycle RHNA allocation. This is an important context for the reader to understand, especially when addressing the challenges of housing production.
20	Clarification	p. 3; paragraph 5; 3.1 Local General Plans and Housing Elements	This section, third paragraph, states that "Jurisdictions are required to update their housing elements to demonstrate how they would accommodate future housing need by preparing a sites inventory." As noted in the earlier comment, housing need comprises both existing and future housing needs. Please clarify in the above-referenced statement.
21	Clarification	p. 3; paragraph 5; sentence 3	"In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion, overcrowding and cost-burden households, population and household characteristics, seniors, and people experiencing homelessness." <ul style="list-style-type: none">Use semicolons to clarify meaning: "In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion; overcrowding and cost-burden households; population and household characteristics; seniors; and people experiencing homelessness."
22	Clarification	p. 4; paragraph 1 3.2 RHNA	This section, first paragraph, states that "The [RHNA] allocation for each jurisdiction is developed by a local Council of Governments (COG) such as



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		Local COG	SCAG." Is a "local" COG an accurate description of SCAG, or is "regional" a more appropriate descriptor?
23	Clarification	p. 4; paragraph 1; sentence 4	"The RHNA process is repeated every eight years to ensure that the State's housing needs are being <u>addressed</u> met and coincides with the housing element update period."
24	Clarification	p. 5; paragraph 1; sentence	"Meanwhile, these factors strengthen SCAG's Connect SoCal regional strategies of growth near destinations and mobility options. <u>These strategies include</u> such as emphasizing land use patterns that facilitate multimodal access to work, educational and other destinations and prioritizing infill and redevelopment of underutilized land to accommodate new growth and increasing amenities and connectivity in existing neighborhoods."
25	Clarification	p. 5; paragraph 2	"The 6th cycle final RHNA plan was adopted by SCAG in March 2021."
26	Clarification	p. 5; paragraph 3	"Together with the General Plan and housing element, the RHNA allocation is a vision of a local jurisdiction's household need and the ways to accommodate its existing and future need while achieving its goals." <ul style="list-style-type: none">Clarify who and what goals is being referred to at the end of the sentence.
27	Clarification	p. 5, 6 4 Existing Conditions	This section, first paragraph, states that "An analysis of existing conditions for the region's housing characteristics provides insight on housing trends, helps identify housing issues communities are facing, and predicts the future needs of the region." How does an existing conditions analysis predict future needs? Please provide a clarifying example or eliminate the reference. The last sentence of Section 4 (on page 6) is perhaps a more appropriate descriptor: "Evaluating the region's housing existing conditions helps SCAG understand the challenges the region is facing to develop implementation strategies and policies to alleviate these challenges moving forward."
28	Clarification	p. 6; paragraph 2	" <u>According to [insert agency data is sourced from], as of 20xx, the</u> The SCAG region has hosts a total of 6,622,509 units in its housing stock. Over half of these units were built before 1980, approximately over 40 years ago. The SCAG region follows California's trend of increasing housing production until 1980 when housing production <u>began</u> begins to decrease dramatically each year thereafter, which has led to a housing shortage (Figure 1). Moreover, Senate Bill 375 (SB 375) became law in 2008, but since then, only 5 percent of total housing stock has been built. While this indicates that growth in housing supply has been slower than anticipated, it also indicates a significant barrier to realizing the vision of SB 375 as the only way to get more housing near transit is to also have more housing overall." <ul style="list-style-type: none">In last sentence, why is housing supply 'slower than anticipated'? Sentence is unclear, please reword.
29	Clarification	p. 6; paragraph 2; last sentence 4.1 Housing Stock SB 375 reference	"...realizing the vision of SB 375 ... to get more housing near transit, is to have more housing overall." The directive of SB 375 is to reduce greenhouse gas emissions through a complement of land use planning and transportation investments. Please provide a statute citation that documents that SB 375 calls for having more housing overall in order to have more housing near transit.



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30	Clarification	p. 6; paragraph 3	<p>"Geographically in the SCAG region, as As housing production continued to decrease dwindle in Los Angeles County, housing production stayed strong in the Inland Empire, which encompasses Riverside and San Bernardino Counties. Determining where housing is needed is a major geographical challenge. Housing production is needed across the region, and in addition to infill areas and other urban locations, housing is still needed in less dense and connected areas. The underproduction of housing has had negative impacts implications on people throughout the region, leading to overcrowding and additional cost burden that disproportionately affect communities of color.</p> <p>Figure 1. SCAG Counties' Counties 2021 Housing Stock"</p>
31	Clarification	p. 7; paragraph 1; sentence 2 4.1 Housing Stock Housing Built before 1990	<p>Page 7, first paragraph, makes an argument that living in a home built before 1990, "when combined with other conditions such as substandard facilities, cost burden, overcrowding and housing <u>under</u>production ... results in a scenario where the region is not meeting the housing needs of who is already here in the region."</p> <ul style="list-style-type: none">• Please provide a citation of source of this conclusion that housing structure age is a key determinant of why the region is not meeting its existing housing need.• And further, how the age of a housing structure "results in a scenario of disproportionate burden and inequity."• In looking at the Section 4.3: Complete Facilities narrative on pages 10-11, there is no discussion or presentation of data about the age of the housing structure as it relates to the units inventoried as lacking kitchen or plumbing facilities.
32	Clarification	p. 7; paragraph 2; sentence 3	<p>"In every county <u>in the SCAG region</u>, there are more homeowners than renters, except for Los Angeles County which has a 55 percent renter-occupied housing rate. However, a look at housing tenure among communities of color reveals an inequitable distribution of homeownership."</p>
33	Clarification	p. 7; paragraph 3; sentence 3	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>For example: "According to SCAG's 2022 Racial Equity Baseline Conditions Report, 61 percent of <u>non-Hispanic</u> White households owned their home compared to only 58 percent of <u>non-Hispanic</u> Asian/Pacific Islander households, 44 percent of Hispanic (<u>or</u> Latino) households, 36 percent of <u>non-Hispanic</u> Black households, and 47 percent of <u>non-Hispanic</u> Native American households. This means that <u>non-Hispanic</u> White household homeownership is nearly twice the rate of <u>non-Hispanic</u> Black households."</p>



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34	Clarification	p. 9 Figure 5 4.2 Housing Tenure By Race & Ethnicity	<p>When discussing home ownership by race and ethnicity, the narrative on page 7 cites SCAG's 2022 Racial Equity Baseline Conditions Report, while Figure 5 cites U.S. Census Bureau data. The use of two cited sources results in homeownership percentage figures that are close but not consistent.</p> <ul style="list-style-type: none">• Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than <u>Hispanic (or Latino)</u>; if so, add “non-Hispanic” to categories other than Hispanic/Latino.
35	Clarification	p. 10 4.3 Complete Facilities	<p>This section, first paragraph, states that “there are still 80,909 units lacking complete kitchen facilities and 22,282 units lacking complete plumbing facilities in the SCAG region.”</p> <ul style="list-style-type: none">• Please also include the total number of housing units in the SCAG region, to provide context on the extent of substandard units.• Cite source and year of data.• Note that JADUs do not require a separate bathroom but are considered a housing unit.• The U.S. Census Bureau counted thousands of additional housing units in the SCAG region that were not estimated by State DOF or reported by cities and counties as officially permitted units. Many of these are presumed to be non-traditional living quarters and may not have full kitchen or plumbing. The Bureau states that “Even tents, old railroad cars, and boats are considered to be living quarters if someone claims them as his or her residence.” (page B-8 https://www2.census.gov/programs-surveys/decennial/2020/technical-documentation/complete-tech-docs/summary-file/2020Census_PL94_171Redistricting_StatesTechDoc_English.pdf) <p>f) If people were living in these structures/objects at the time of the 2020 Census, these were counted as ‘housing units’ and reported in the 2020 Census housing count that is used as a benchmark by DOF and most agencies.</p>
36	Clarification	p. 10; paragraph 2	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>For example: “This issue becomes more pronounced when analyzing rates among communities of color and comparing them to <u>non-Hispanic</u> White communities and regional averages. SCAG’s 2022 Racial Equity Baseline Conditions Report found that in the SCAG region, <u>non-Hispanic</u> Native Americans and <u>non-Hispanic</u> Black residents are three times more likely to live in housing units without plumbing facilities than <u>non-Hispanic</u> White households (1.1 percent, 0.7 percent, and 0.3 percent, respectively). Across the region, 1.4 percent of <u>non-Hispanic</u> White residents live in housing units without complete kitchen facilities, compared to 2.0 percent for <u>non-Hispanic</u> Native Americans and 1.8 percent for <u>non-Hispanic</u> Asians/Pacific</p>



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			Islanders. This inequity is particularly apparent in rural Imperial County, where one out of every 20 <u>non-Hispanic</u> Black residents (about 5 percent) live in housing units without complete kitchen facilities, which is significantly higher than the overall county rate of 0.9 percent. A similar trend is found in Ventura County where 3.1 percent of <u>non-Hispanic</u> Black people live without kitchen facilities compared to <u>non-Hispanic</u> White people at 1.2 percent. ⁶ The disproportionate rates of substandard housing in communities of color compared to <u>non-Hispanic</u> White communities and the overall average suggest that the production of more housing in these communities, especially in rural and non-infill areas, can address historical disparities.”
37	Clarification	p. 11, Figure 8 4.3 Complete Facilities	a) Figure 8 does not have any bar illustrating the percentage of White households that lack kitchen and plumbing facilities. Is the first "Other" bar incorrectly labeled, and should be the "White" bar at 0.19%? b) Also, there is no discussion about the information in Figure 8, in the narrative. The narrative cites SCAG's 2022 Racial Equity Baseline Conditions Report, where the lack of kitchen facilities is independently quantified from the lack of plumbing facilities. Figure 8, on the other hand, tabulates the percentage of households (by race and ethnicity) lacking kitchen and plumbing facilities <u>combined</u> and not separately. As a result, the percentage numbers between the narrative and Figure 8 do not match. c) Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add “non-Hispanic” to categories other than Hispanic/Latino.
38	Clarification	p. 12; paragraph 1; sentence 3	“Households that spend more than 30 percent of their income on housing are considered <u>cost burdened</u> “overpaying” and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases.” <ul style="list-style-type: none">• “overpaying” is not the same as “cost-burdened”- overpaying is associated with the cost of the rent, not the share of income being paid on rent.
39	Clarification	p. 12, 13 Figure 9 Figure 10 4.4 Cost Burdened Households 2012, 2019, 2021	This section discusses the percentage of cost burdened households, across several referenced years (2012, 2019 and 2021). However, the percentages cited in the narrative, do not match the information in Figure 9 or Figure 10. Please re-review and correct. One issue could be that the narrative separates a discussion of renters versus owners, whereas the Figures could possibly be a combination of all households (i.e., renters <u>and</u> owners). However, the discussion relating to all households (renters and owners) on page 12 and supposedly illustrated in Figure 10, still does not match. And the conclusion: that 43.2% of all occupied housing units in the SCAG region are cost-burdened, does not seem to be illustrated in Figure 10. Depending on the corrections needed, update the last sentence: “However, in Orange County, the ratio of severely cost-burden households of all overall paying renters increased by 2.4 percent.”
40	Clarification	p. 14; Figure 11	Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add “non-Hispanic” to categories other than Hispanic/Latino.



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41	Clarification	p. 14; paragraph 1; sentence 2	"All other racial and ethnic households experienced greater cost burden regardless of whether they rent or own their homes than when compared to <u>non-Hispanic</u> White households. Hispanic (<u>or</u> Latino) and <u>non-Hispanic</u> Black homeowners and renters experience the greatest cost burden across racial and ethnic households in the SCAG region."
42	Clarification	p. 16; paragraph 1; sentence 2	<p>"When considering income, there are emerging inequities for households with very low income." This sentence is unclear and does not explain emerging inequities.</p> <p>"Severe <u>cost burden overpayment</u> is a particular burden for low-income families, who have extremely limited resources to spend on daily needs such as transportation, food, and healthcare in addition to housing costs." Use consistent language throughout document.</p>
43	Clarification	p. 16; paragraph 2 & 3	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>For example: "A disparity in cost burden emerges in a further analysis between communities of color and <u>non-Hispanic</u> White communities. Across the region, <u>non-Hispanic</u> Black, Hispanic (<u>or</u> Latino), and <u>non-Hispanic</u> Native American households – regardless of whether they own or rent – experience the greatest housing cost burdens. While a little over one of four <u>non-Hispanic</u> White households pay more than 30 percent of their income on rent, almost one out of two Hispanic (<u>or</u> Latino) households do (46 percent). This figure is 41 percent for <u>non-Hispanic</u> Black households and 33 percent for <u>non-Hispanic</u> Native American households. The high burden of housing costs carries over into homeownership. For Hispanic (<u>or</u> Latino) home-owning households, 18 percent are cost burden and is 14 percent and 17 percent for <u>non-Hispanic</u> Black and <u>non-Hispanic</u> Native American households, respectively. This is significantly higher than the rate for <u>non-Hispanic</u> White home-owning households at 10 percent.</p> <p>Considering that communities of color have almost twice the rate of poverty (households below 200 percent the poverty line) than the <u>non-Hispanic</u> White community (41 percent and 22 percent, respectively), cost burden inequities further widen for these communities since fewer resources are available to spend on necessities such as food, transportation, and healthcare."</p>
44	Clarification	p. 16 4.4 Cost Burdened Households By Race & Ethnicity	a) The page 16 discussion on cost-burdened households by race and ethnicity and the SCAG region overall, cites percentages that seem to lack a data source. Is this also SCAG's 2022 Racial Equity Report (the Source Reference #7 at the end of the last sentence in the third paragraph of this section)?



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			b) It would also be helpful to the reader if the cost burdened information by race and ethnicity could also be presented in a Figure, to allow for a more streamlined comparison of the data.
45	Clarification	p. 16 & 18; +Figure 14 4.5 Overcrowding	<p>a) The Overcrowding discussion, starting on page 16, states that the U.S Department of Housing and Urban Development defines overcrowding as more than 1.01 persons per room in a housing unit. Please include a footnote or clarification that there are certain rooms in a housing unit that are excluded from the 1.01 persons per room calculation, and identify said rooms that are excluded.</p> <p>b) Please reference in the narrative discussion, the associated Figures that illustrate the overcrowding data (e.g., Figure 12, Figure 13, Figure 14 and Figure 15, where applicable in the narrative discussion).</p> <p>c) The narrative also states that "Since 2012, these [overcrowding] percentages have slightly decreased." Please clarify if "these" refers to Los Angeles County or the SCAG region. Unclear.</p> <p>d) Figure 14 is: missing/misabeled the bar to illustrate the percentage of White households experiencing overcrowding. The title of Figure 14 should also reference that it is households that is being depicted.</p> <p>e) Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is 'select racial/ethnic' categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly.</p> <p>f) The narrative on the second paragraph of page 18 states that Black and Asian/Pacific Islander households have overcrowding rates of 3 and 4 percent, respectively. If the report is rounding up the percentages illustrated in Figure 14, the percentage for Asian/Pacific Islanders should be revised from 4 to 5 percent, similar to what was done for the Black households data.</p>
46	Clarification	p. 18; paragraph 2	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>"Similar to other data on existing conditions shared in this chapter, communities of color represent a disproportionate amount of the SCAG region's <u>overcrowded population</u>overcrowding data. Across the region, there is a much higher likelihood for Hispanic (<u>or</u> Latino) households to be living in overcrowded housing with approximately one out of 10 <u>households</u> in overcrowded conditions at 10 percent, while <u>non-Hispanic</u> White households have a rate of about one out of 100 (1 percent). While lower than Hispanic (<u>or</u> Latino) households, <u>non-Hispanic</u> Black and <u>non-Hispanic</u> Asian/Pacific Islander households also have higher overcrowding rates at 3 percent and 4 percent, respectively.⁸"</p>



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47	Clarification	p. 19; paragraph 1; last sentence	"Housing prices and rents increase further out of reach for existing residents." <ul style="list-style-type: none">Sentence seems incomplete.
48	Clarification	p. 19; paragraph 2	"This neighborhood change of <u>a lower-income neighborhood</u> an initially lower socioeconomic status transitioning to one of higher <u>income and</u> socioeconomic status, also known as gentrification, is considered as a precursor to rising housing costs and displacement....The same study noted there was no significant relationship between rent increases and losses of low-income White households.9" <ul style="list-style-type: none">Does the last sentence refer to Whites that may also be Hispanic or Latino or non-Hispanic Whites?
49	Clarification	p. 20-21; Figure 16 Figure 17 4.7 Homelessness	a) Label Figures 16 and 17 or revise the titles of these figures, to clarify that the numbers on the vertical axis represent the homelessness population. b) On Figure 14, there are references to the plotted data such as "Santa Ana, Anaheim/Orange County," "San Bernardino City & County," "Riverside City and County," and "Oxnard, San Buenaventura/Ventura County." Please include a footnote explaining if the "County" references refer to the homeless population in county unincorporated territory in addition to the cities cited, to avoid a misinterpretation that it refers to the number of homeless in the entire county boundary. Also, the graph approach is very difficult to read and perhaps a table of the data would be a better approach to identify the change in the homeless population across the years. c) are the geographic areas reported for Health Care Agencies or some other type of agency? Please add the agency type to the title of Figure 16.
50	Clarification	p. 21; paragraph 1	"According to California Continuums of Care (COC), the unhoused population count for CoCs across the SCAG region were 53,729 in 2012 and <u>increased</u> jumped by 38 percent to over 74,000 in 2019. However, in 2021 the count dropped significantly to less than 23,000 and <u>then increased</u> jumped to almost 85,000 in 2022, meaning that the unhoused population <u>increased overall</u> jumped by 58 percent in the last decade <u>but is still lower than the 2006 count of XXXXX</u> . The reason for the 2021 fluctuation may be caused by undercounting due to the pandemic <u>and associated shutdowns</u> ." Please add count for 2006 into narrative.
51	Clarification	p. 22; paragraph 2; last sentence	"In contrast, only 14,000 units were permitted at its lowest point in 2009, during the <u>low point</u> peak of the most recent housing recession."
52	Clarification	p. 22, 23-24 Figure 18 Figure 19 5 Housing Production: Building Permits Issued versus Housing Units Permitted	This entire discussion about how many building permits were issued in the SCAG region, for single- and multi-family units, needs to carefully be re-reviewed and revised, both in the narrative discussion and in Figures 18 and 19. Does the data represent the number of building permits issued, or the number of units that were permitted? Clarity on this issue is especially critical for multi-family development, where one building permit can be issued for one building that incorporates tens or hundreds of residential units within that one building. This clarity would also affect the conclusions about trends. What should be depicted is the number of units that were permitted, not the number of building permits issued. The latter has no real relevance to housing supply diversity, since it does not represent the total number of housing units that were constructed.



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			<p>a) For example, if the data represent the number of units permitted, then change the title of Figure 18 to: “SCAG Region <u>Number of Housing Units Permitted Building Permits Issued</u>” and “The share of total <u>units permitted permits</u> by housing type also fluctuated over the past four decades.”</p> <p>b) Figure 19. SCAG Region <u>Shares of Housing Units Permitted by Type Building Permits Issued Percentage</u></p>
53	Clarification	p. 23; paragraph 2; last sentence	<p>“While one could conclude that the SCAG region collectively met a substantial portion of its total housing need, a significant percentage of affordable housing need was largely unmet as illustrated in Figure 19.”</p> <ul style="list-style-type: none">Explain how the affordable housing need was unmet and how Figure 19 illustrates that.
54	Clarification	p. 24 Figure 20 5 Housing Production: 5th Cycle RHNA	<p>The discussion on the 5th cycle RHNA should:</p> <p>a) first reference that this discussion is HCD information on the 5th RHNA cycle, and should also include information on the dates of the planning period of the 5th RHNA cycle, in addition to the 6th RHNA cycle, to give the reader some context.</p> <p>b) What does “fulfillment” mean? Is it the number of building permits issued, or residential units finalized? Change title to “Figure 20. SCAG Region 5th Cycle RHNA <u>Share of Income Category Fulfillment Percentage (Units Permitted)</u>”</p>
55	Clarification	p. 24; paragraph 2	<p>“The trend of producing only a small portion of affordable housing combined with factors such as homelessness, and for communities of color lower homeownership rates and increased cost-burden, overcrowding, and substandard housing, suggest a problem that extends beyond supply and demand.” First sentence is difficult to understand. Reword or use additional punctuation to clarify.</p>
56	Clarification	p. 25 Figure 21 Paragraph 2 5.2 Challenges in Meeting Housing Needs	<p>The narrative in this section discusses the ratio of housing units produced per persons added to the region, over five distinct decades. When discussing how the ratio of units to population increased or decreased, is the correct relationship being understood? Would the use of the term “improved” or “worsened” be clearer?</p> <p>Change title to “Figure 21. SCAG Region <u>Housing Unit vs. Population Growth Comparison</u>”</p>
57	Clarification	p. 26; paragraph 5	<p>“In addition to the new requirements of realistic development capacity, achieving compliance has also become stricter. Jurisdictions in the SCAG region that achieved compliance by October 2022 have until February 2025 to complete any necessary rezonings. Jurisdictions that did not achieve compliance by October 2022 must now complete necessary rezonings before they can receive HCD approval. This poses a problem for jurisdictions that need funding to implement their housing element but cannot achieve the grant requirement of housing element compliance due to the inability to undertake the rezonings.”</p> <ul style="list-style-type: none">Language regarding deadlines for rezoning is not consistent across RTP documents. Review and ensure correct dates are reported across all documents.



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			<ul style="list-style-type: none">Is the February 2025 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned and inconsistent with other documents and sections that mention an October 2024 deadline. Please check dates against statute and update as applicable throughout all documents regarding this topic.
58	Clarification	p. 26; paragraph 6	<p>"In the early 21st century, expansion on the urban fringe continued in some places, though the region's fragile and rugged natural landscape—as well as sheer distances—present substantial limits."</p> <ul style="list-style-type: none">Remove "fragile" or expand on what this means
59	Clarification	p. 27; paragraph 4	<p>"Beyond planning challenges, the cost of building residential units is another primary barrier to meet housing need. Not only does it include construction costs, such as the cost of land, materials, and labor, but jurisdictional processes, <u>state mandates</u>, and environmental requirements can also add cost to the process."</p>
60	Clarification	p. 27; paragraph 7; sentence 2	<p>"Issues such as a smaller workforce pool after the last recession in 20xx, an aging workforce where one in five workers is currently over 55, and strong competition from related..."</p> <ul style="list-style-type: none">Specify which recession is being referred to.
61	Clarification	p. 28; Table 2	<p>"Table 2. California Cost Construction <u>Costs</u> Annual Percentage Change"</p> <ul style="list-style-type: none">Are these all types of construction or just housing? Perhaps include clarification in title.
62	Clarification	p. 29 Section 5.2	<p>The Insufficient Resources discussion states that a lack of local jurisdiction staffing or funding to implement affordable programs or design zoning codes can be a restriction to encouraging housing production. Please cite the survey or source of this conclusion.</p>
63	Clarification	p. 30 5.2 Challenges in Meeting Housing Needs: Development and Impact Fees	<p>In the discussion on development impact fees on page 30, reference is made to needing these fees "to support the approval of the development such as staff time for permitting, inspections." There may be confusion between a local jurisdiction imposing a processing fee, where the fee is used to cover the cost of staff time to review and process the development application and associated environmental analyses, versus a development impact fee, which is used to assess a pro rata share of fees to cover local, county or regional need for schools, parks, or infrastructure that are needed to support the increased population generated by the proposed project.</p>
64	Clarification	p. 31; paragraph 2	<p>"As illustrated in previous sections, <u>multiple factors that are found throughout the planning and building process contribute to the causes of the housing crisis</u> are at various points in the process to plan and build housing. ... The following section describes a snapshot of funding for planning and building housing, technical assistance offered by SCAG, and strategies implementable by local jurisdictions—all of which may contribute to increasing the all various ways to increase housing supply."</p>
65	Clarification	p. 32; paragraph 2	<p>"SB 2 also established the Permanent <u>Local Housing Allocation (PLHAPHLA)</u> program. Under this grant, the amount of PLHA funding for entitlement jurisdictions is based on the formula funding for the Community Development Block Grant (CDBG) Program for a five-year period, and through a competitive grant program to non-entitlement jurisdictions. As of</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Round 3, all awarded applicants in the SCAG region were entitlement jurisdictions...." <ul style="list-style-type: none">Briefly explain what 'non-entitlement' and 'entitlement' jurisdictions are and if this means that some agencies qualify under certain parameters or not. Perhaps refer reader to location to find more detailed information.
66	Clarification	p. 37; paragraph 1	"There are a variety of strategies and tools that local jurisdictions and stakeholders can employ to plan for and <u>facilitate the building of build</u> housing."
67	Clarification	p. 37; paragraph 5	"15-minute communities draw social and economic resilience benefits that address shocks and stressors including households with limited mobility options, the age dependency ratio, and limited tree canopy/urban heat island effect." Do 15-minute communities draw or create benefits?
68	Clarification	p. 38; Figure 23	Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is 'select racial/ethnic' categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly with "non-Hispanic" for each category other than Hispanic or Latino if the data actually reflect race categories broken out by Hispanic/Latino ethnicity. A note should be added to the Figure if only the White category is non-Hispanic and all others may include Hispanics or Latinos.
69	Clarification	p. 39; Age dependency ratio	The narrative discusses the age dependency ratio as being "measured by the percentage of the population younger than 20 years old and older than 64." The typical age dependency ratio is the population under 15 and 65+. Please verify SCAG's definition and if ratio used deviates from traditional ratio, explain why the ratio was changed.
70	Clarification	p. 39, 40 Figure 25 7 Best Practices for Jurisdictions and Stakeholders: Tree Canopy	Please clarify how an area that is or is not covered by tree canopy, is determined. Is this done on a parcel by parcel basis, or the number of trees located by area or acreage, or other factor? Please provide a summary of the State Department of Public Health's methodology, given that the SCAG region is identified as having more than 90% of its acre not covered by tree canopy. Also, perhaps there should be some discussion about the breadth of geography that the SCAG region encompasses, which includes high desert communities.
71	Clarification	p. 39; paragraph 2	"These communities are more susceptible to the effects of extreme heat events and offer less carbon sequestration, making the community overall a less pleasant place to engage in activities." <ul style="list-style-type: none">Please clarify if 'activities' include everything or if it is referring to physical and/or outdoor activities.
72	Clarification	p. 40; Figure 25	Include year of data being reported in title and source.
73	Clarification	p. 41; paragraph 1	"Once inefficiencies are identified, jurisdictions can implement strategies such as consolidating the review process, creating multiple points of entry to secure a building permit, creating an expedited process for certain types of projects such as affordable housing, updating permitting software, and lowering the threshold for project to receive a ministerial permit. ³² " <ul style="list-style-type: none">What are "multiple points of entry to secure a building permit"?



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
74	7.4 Housing Supportive Infrastructure	p. 42	The second paragraph on page 42 states "Moreover, many jurisdictions do not have an updated to date assessment of their utility infrastructure.....". Perhaps this should read "updated assessment" or "up-to-date assessment"?
75	Clarification	p. 44	Ensure language of regional planning policies is the same as in the main Connect SoCal document.

Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS

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



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			boundary, otherwise known as “Spheres of Influence” the growth must be feasible
10	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
11	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/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 notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>
12	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
13	General Comment	All pages	<p>The phrase “natural and farmlands” is used throughout this and other documents. To clarify, amend phrasing, e.g., ‘natural lands and farm lands’ or ‘natural and farm lands’. Example on page 2 paragraph 2 second sentence: “This chapter also covers climate resilience, and natural and farmland preservation, and complete communities”... where the current wording language does not make sense to say “...and natural preservation”</p> <p>Please revise phrasing and proliferate throughout all documents.</p>
14	Clarification	p. 1; bullet 1	“Regional Housing Needs Assessment (RHNA), the state-mandated state mandated vehicle for identifying and allocating housing need in the state.”
15	Clarification	p. 1; bullet 5 on page	“SCAG’s Racial Equity Early Action Plan, defined racial equity for SCAG and established a series of goals and strategies for SCAG to advance racial equity in the region. The Racial Equity Early Action Plan has spurred additional racial equity centered work including the convening of the Racial Equity and Regional Planning Subcommittee, <u>which</u> developed a series of recommendations to advance racial equity in the Plan. These recommendations are reflected throughout the Plan.”
16	Clarification	p. 2; paragraph 1; sentence 4	“The Local Data Exchange process informed the FRDP through a series of touchpoints with local jurisdictions where they were presented with information on project growth in their jurisdictions for input to ensure



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			<u>entitlements were accurately reflected and the PDAs and GRRAs were considered these assumptions were reflected in local plans."</u>
17	Clarification	p. 4; paragraph 2; sentence 1 last sentence	"Under SB 375, SCAG's role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for <u>land use planning and management implementing it.</u> " "This included information on land use, transportation, priority development areas, geographical boundaries, resource areas, and growth that was shared and exchanged through a combination of one-on-one meetings <u>with</u> and data submissions <u>from</u> with local jurisdictions."
18	Clarification	p. 5; bullet 5	"Did the MPO/RTPA who has federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP? (23 CFR 450.316(d))" <ul style="list-style-type: none">• Define RTPA
19	Revision	P.6, paragraph 2	In the second paragraph, revise the first sentence to include the following language: Under SB 375, SCAG's role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for implementing it, <u>where applicable and feasible.</u>
20	Clarification	p. 6; paragraph 4; sentence 1	"Put simply, the emphasis of RHNA in the 6 th sixth cycle expanded to a more comprehensive assessment of the need for housing: <u>explicitly addressing</u> the existing need plus the need to house anticipated population growth. In prior cycles it focused on need due to anticipated population growth, <u>which addressed existing need through adjusting future households.</u> "
21	Clarification	p. 6; paragraph 5; sentence 2	"Some local updates are not due to HCD until October 2024 and at the time of the LDX conclusion <u>in December 2022</u> , only 84 of 197 jurisdictions had an adopted and certified housing element." <ul style="list-style-type: none">• Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.
22	Clarification	p. 10; paragraph 2; sentence 1-2	"In the early twenty-first century, expansion on the urban fringe has continued in some places, though the region's fragile and rugged natural landscape—as well as sheer distances—present substantial limits. As a result, there has been an increase in infill development and a higher share of new housing consisting of multifamily units in existing communities since the Great Recession, <u>due in part to less available land to build on.</u> " <ul style="list-style-type: none">• Remove "fragile" or expand on what this means
23	Clarification	p. 10; paragraph 6; last line	"From 2012 to 2019, new development throughout the region resulted in the amount of natural lands decreasing by roughly 50,000 acres, or 0.2 percent. Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life." <ul style="list-style-type: none">• Define 'natural lands' and provide source• Define 'vital habitats' and provide source



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
24	Clarification	p. 11; paragraph 2; sentence 2	<p>"From 2012 to 2018, however, new development in areas with longstanding agricultural resulted in farmland decreasing in Southern California by more than 40,000 acres, or 3.5 percent."</p> <ul style="list-style-type: none">Was this land all zoned as agriculture or was it zoned for another use and temporarily used as agriculture? There are portions of the region where land is zoned for residential or commercial and temporarily being used as agriculture.Conversion of some agriculture land may also be due to rezoning to accommodate RHNA allocations.
25	Clarification	p. 11; paragraph 3; sentence 2	<p>"Additionally, development on natural and farmlands often occurs away from <u>existing</u> jobs, schools, retail, health care, and high-quality transit service, leading residents to drive longer distances to access key destinations."</p>
26	Clarification	p. 12; map 1	<ul style="list-style-type: none">Map has poor resolutionDefine 'Protected Open Space Areas' on the map pageWhy are there several different data sources with different dates layered on top of one another?
27	Clarification	p. 15; paragraph 3; sentence 2	<p>"As a result, <u>the most reasonable utilization and, where appropriate,</u> conservation of natural and farmlands is an important strategy to support SB 375 objectives. "</p>
28	Clarification	p. 15; paragraph 5	<p>"Broadly speaking, growing sustainably requires growing <u>partly</u> in places and ways that achieve substantial housing growth within complete communities while <u>reasonably managing</u> minimizing growth at the urban fringe and beyond. <u>To a degree, h</u>ousing of various types can be located in areas that<u>which</u> promote location efficiency, good accessibility, and do not <u>result in the utilization of</u> risk natural lands or <u>risk</u> environmental hazards."</p>
29	Clarification	p. 18; table	<p>"Stressors: Chronic challenges that weaken natural, built, or human resources..."</p> <ul style="list-style-type: none">Car-less Households"Why is 'car-less household' a stressor? Aren't car-less households encouraged by State to reduce ghg? What if the lack of automobile is a purposeful choice?
30	Clarification	p. 19; paragraph 2; last sentence	<p>"SB 375 requires that Connect SoCal 2024 contain a Forecasted Regional Development Pattern (FRDP) —a growth vision—that can be shown to achieve GHG emissions reductions targets when combined with transportation network data and additional Plan strategies. The Connect SoCal 2024 growth visioning process integrated sustainability considerations into a preliminary development pattern. This was then shared with local jurisdictions through the Local Data Exchange (LDX) process, which is described more comprehensively in Section 5.5, for review and feedback and became the FRDP. This is a departure from previous plans where local review occurred much earlier in the plan development process, <u>and jurisdictions could only provide public comment about the growth forecast after SCAG's visioning process and alternate growth forecasts were developed.</u>"</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
31	Clarification	p. 19; paragraph 4; sentence 1	"The Regional Growth Forecast, described in detail in the Demographics and Growth Forecast Technical Report, is <u>the</u> starting point for the Connect SoCal 2024 growth vision."
32	Clarification	p. 21; map 2	Add note specifying land use categories were standardized by SCAG.
33	Clarification	p. 23; paragraph 1	"The latest jurisdictional existing land use, general plan land use, and other data serve as the basis for future year population and household allocation in that they reflect supply. These measures of remaining capacity are matched with county and regional growth—demand—using growth—demand—using a mathematical approach. As such, the projection does not reflect a build-out scenario. Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a theoretical physical capacity of roughly 8.2 million housing units—several times higher than anticipated household growth. <u>However, for these additional units to be realized, oftentimes the existing structures would have to be demolished and replaced with higher density developments.</u> Using this capacity as a starting point, the Regional Growth Vision:"
34	Clarification	p. 23; bullet 3; sentence 4	"Edits received on growth are often reflective of local general plans, local growth policies, <u>entitled and approved projects</u> , historic preservation, anticipated job growth, amongst several other factors."
35	Clarification	p. 28; second bullet	" Implement <u>Promote</u> the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning..."
36	Clarification	p. 29; paragraph 3	"This data was mapped and functioned as a key informational resource during local review along with the PDAs. As a result of this process, growth in overlapping GRRAs has been de-emphasized but not completely <u>eliminated in</u> eliminated in the Connect SoCal 2024 forecasted development pattern. pattern. "
37	Clarification	p. 29; paragraph 5; sentences 3-4	"CoSMoS is an online mapping viewer that makes detailed predictions over large geographic scales of storm-induced coastal flooding and erosion for both current sea level rise (SLR) scenarios. The data included in this <u>technical report book</u> depicts the potential inundation of coastal areas resulting" <ul style="list-style-type: none">• What are the "both" scenarios?
38	Clarification	p. 34; paragraph 3; sentence 2	"Local jurisdictions were then engaged for review and feedback that was then <u>incorporated</u> integrated to best reflect local plans and conditions."
39	Clarification	p. 35; Map 6	Explain what is being shown or add a note referring the reader to the specific section that explains the map
40	Correction	p. 36; paragraph 1; sentence 4	"132 local jurisdictions provided input on SCAG's draft growth forecast, while 148 percent provided input on other data elements such as GIS maps or surveys." <ul style="list-style-type: none">• Correct the 148 percent
41	Clarification	p. 37;	"Data– For the one question assessing data collected by local jurisdictions, the most common are: Local road pavement management and performance data (52 jurisdictions), Collision data (51 jurisdictions) and Pavement Condition Index (49 jurisdictions)."



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			<ul style="list-style-type: none">• Please clarify
42	Clarification	p. 37; paragraph 1	<p>“To ensure that the local edits to the development pattern appeared on-track to reach SCS objectives, SCAG conducted a sketch-planning evaluation with the assistance of the Technical Working Group (TWG), <u>which this occurred prior to development of subsequent Connect SoCal 2024 strategies and modeling²⁶. modeling²⁶</u>. According to this evaluation, the FRDP has slightly less growth in the most prioritized areas (<u>steps 1-3 representing areas with more than one PDA and no GRRAs</u>) than the preliminary projection (steps 1-3 representing areas with more than one PDA and no GRRAs); however, its performance exceeded that of the final, adopted Connect SoCal 2020. Similarly, the share of growth in <u>areas with no more than one GRRAs</u> increased from 88 percent to 90 percent compared to the prior plan (Figure 1).”</p>
43	Clarification	p. 37; Figure 1	<p>Add note under figure with definitions of acronyms as figures can be pulled out as standalone items. Change title or add note explaining more about what the figure represents.</p>
44	Clarification	p. 37; Figure 1	<p>“On April 20, 2023, the TWG discussed the FRDP and along with staff <u>and it</u> was determined to be sufficiently able to further the plan’s statutory objective to proceed with subsequent modeling and regional policy development.”</p>
45	Clarification	p. 38; Map 7	<p>“Source: SCAG 2023. Priority areas refer to <u>an area with more than one PDA and no GRRAs</u>. Resource areas refer to two or more GRRAs.</p> <p>Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone-(TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>
46	Clarification	p. 39; paragraph 1; last sentence	<p>“In addition, the region will <u>can</u> grow sustainably by incorporating climate resilience <u>strategies</u> and <u>promoting and reasonably pursuing</u> natural and farmland conservation, and broad complete communities strategies, including the concept of 15-minute communities.”</p>
47	Clarification	p. 43; paragraph 1 under Natural and Farmland Preservation)	<p>“Preserving <u>and most reasonably utilizing</u> the region’s natural and farmlands will ensure that future generations will be able to enjoy Southern California’s unique landscapes as we do, and benefit from the essential resources that natural lands provide.”</p>
48	Clarification	p. 44; paragraph 3	<p>“Connect SoCal anticipates <u>and projects</u> that some of the existing natural and farmlands in the region will convert to urban uses as the region grows to accommodate 1.6 million additional households.”</p>



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49	Clarification	p. 44; paragraph 5	"For natural lands, 48,590 acres are anticipated <u>and projected</u> to be converted to urban uses by 2050 from existing conditions. This represents 617 acres more than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in <u>a projected</u> 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline."
50	Clarification	p. 44; paragraph 6	"For agricultural areas, specifically, implementation of Connect SoCal <u>would</u> will result in <u>the projected</u> conversion of 8,156 acres to urban uses - a <u>projected</u> loss of an additional 1,464 acres of farmland over the Trend/Baseline. There are <u>would be</u> economic impacts due to this projected loss of farmland, where agricultural production value is anticipated to decline by roughly \$9 million through year 2050 compared to the Trend/Baseline. With this <u>Plan's projected</u> loss of both natural and farmlands, groundwater recharge is anticipated to decline by 129,326 acre-feet - 24,862 more acre-feet than the Trend/Baseline scenario."
51	Clarification	p. 46	Asterisks are used in the bulleted lists but are not explained. Please explain.
52	Clarification	p. 47; paragraph 2	"Tax increment financing which includes but is not limited to Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), Neighborhood Infill Finance and Transit Improvements Districts (NIFTIs), and Affordable Housing Authorities (AHAs) is a tool that can allow local jurisdictions and public agencies to collaborate on achieving infrastructure, mobility, economic development, sustainability, and housing goals by leveraging tax increment (captures generated property tax as a result of invested dollars) to fund multifamily affordable housing, transit/rail capital projects, Transit-Oriented Development, Complete Streets capital projects, parking, parks and open space, and programs to reduce GHG emissions and VMT within TPAs. SCAG has supported <u>the</u> establishment of several EIFD districts in the SCAG region through funding and technical assistance programs." <ul style="list-style-type: none">• Sentence 1 is a very long sentence. Try to break up if possible.
53	Clarification	p. 50; last bullet	" <u>Support the development of</u> Develop housing in areas with existing and planned infrastructure, availability of multimodal options, and where a critical mass of activity can promote location efficiency.
54	Clarification	p. 51	What is the reduction in GHG? This should be called out
55	Clarification	p. 51; bullet 2	"Improved pedestrian infrastructure - Pedestrian oriented design can create a more accessible and connected environment to key destinations and activity centers, increase transit ridership, and reduce the number of single-occupant trips. Continuous and cohesive sidewalk networks improve the safety and comfort of streets, enabling people of all ages and abilities to get where they want to go. Improving walkability often means <u>installing</u> implementing new sidewalks, improving the quality of existing sidewalks and including street trees and other amenities."
56	Clarification	p. 51; bullet 3	"Co-working ...This strategy was developed using a very conservative assumption that a small portion of long-distance commuters would



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			substitute a single day per week of their commute for a co-working site within three miles of their home.” <ul style="list-style-type: none">• Are these co-working sites new? Informal? Is there some sort of inventory of these now? Are more expected/planned?
57	Clarification	p. 58; bullet list	What are LDCs?
58	Clarification	p. 58	<p>Add new section:</p> <p>“7.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency</p> <p>In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.</p> <p>SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however,</p> ”



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



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA)."
59	Clarification	p. 59	SCAG should explain on this page how we are meeting the GHG reduction targets. Supply the metric associated with Land Use
60	Clarification	p. 61; endnote	<p>"25-At the time of the release of the initial growth preliminary forecast development (April May 2022), only 12 of the region's 197 jurisdictions had 6th cycle housing elements which that had been adopted and certified by the state. While local jurisdictions were requested to consider housing element updates in their review of LDX growth data, only 87 had adopted and certified housing elements even by the January 2023, immediately after the deadline for LDX input. Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024.</p> <ul style="list-style-type: none">Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.

Table 11. MOBILITY TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
8	4.3.2: Existing Transportation System: Local Streets and Roads	p. 205	Please clarify if the definition and discussion on local streets and roads pertains only to public local streets and roads, or if it also includes privately-owned streets. With the discussion on maintenance needs and funding sources, it appears that the discussion pertains to only public local streets and roads, and the reference to "public" is recommended to be included in the narrative.



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
9	4.6.1: Declining Infrastructure	Figure 4-4, p. 211	Figure 4.4: 2022 Bridge Conditions in the SCAG Region, is missing an information label for the "Y" axis. What do these numbers on bridge condition for each of the six SCAG counties represent?
10	4.6.2: Congestion and Delay: Daily Person Hours of Delay	p. 212, 213; Figure 4-6	<p>The narrative discussing person hours of delay by facility type (page 212, last paragraph) does not match with the information presented in the corresponding Figure 4-6 on page 213. Please re-check the percentages called out in the narrative, against the calculation of percentages with the data in Figure 4-6 on daily person-hours of delay between Base Line (2050) and the Plan (2050).</p> <p>"Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of 17 percent overall, highway and 21.7 percent on highways and 8 percent on arterials compared to <u>Base Year</u> Baseline conditions." Or</p> <p>"Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of <u>20.17</u> percent overall, highway and <u>19.2</u> 21.7 percent on highways and <u>17.8</u> 8 percent on arterials compared to Baseline conditions."</p>
11	4.6.2: Congestion and Delay: Truck Delay by Facility Type	p. 213, 214 Figure 4-7	<p>The narrative discussing average daily truck delay by facility type (page 213, last paragraph) does not match with the information presented in the corresponding Figure 4-7 on page 214. Please re-check the percentages called out in the narrative, against the calculation of percentages with the data in Figure 4-7 on truck delay <u>by facility type</u>, between Base Line (2050) and the Plan (2050).</p> <p>"Connect SoCal 2024 is estimated to reduce truck delay by 19 percent over Baseline conditions for the category of highway/expressway, with <u>13.8</u> 18.1 percent over Baseline conditions for the arterials <u>and 18.1 percent overall</u>."</p>
12	4.6.6: Speed Management	p. 217	The last paragraph of this section discusses AB 645's pilot program for speed management. Since several SCAG local jurisdictions will be participating in the pilot program, a call-out of the participating jurisdictions is recommended.
13	4.9.3: Performance Measure 2: Pavement and Bridge	p. 228, 229 Figure 4-10: State Figure 4-11: SCAG	The narrative on page 228 discusses the pavement conditions of the State and SCAG region, for roads and bridges. Noting that most of the pavement condition falls within the Fair category, is there a reason why Figure 4-10 and Figure 4-11 do not display any information on the Fair Category, and only focus on the Good and Poor pavement and bridge conditions?
14	4.10: Where Do We Go From Here? 4.10.4 Smart Cities	p. 233, 235	<p>The first full paragraph on page 233 states that "...the cost of rebuilding roadways <u>pavement</u> could be 14 times more than preventive maintenance."</p> <p>Later, on page 236, third bullet, the technical report states that "The cost of rebuilding roadways <u>pavement</u> is exceptionally more (up to eight times more) than preventative maintenance."</p> <p>Please re-examine the differing percentages, and reconcile.</p>



Table 12. PERFORMANCE MONITORING TECHNICAL REPORT COMMENTS

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



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



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

Table 13. PROJECT LIST TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	Correction	All Pages 2-430	Change "\$1000's" to "\$1,000s"
3	Correction	p. 100; Table 1	Table 1, Row 9, ORA111207, Project cost should be \$423,000 (per FTIP amendment #23-11)
4	Correction	p. 257	RTP ID 2T01135, Lead Agency should be "Various Agencies" and Project Cost should be \$423,000

Table 14. PUBLIC PARTICIPATION AND CONSULTATION TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	Clarification	p. 10; Section 9.1. Survey Findings, first sentence	Clarify if respondents had the opportunity to take the survey more than once. If so, did the 3,683 "completed surveys" actually come from 3,683 respondents? If not, that should be mentioned in the paragraph.
7	Clarification	p. 10; Figure 1. Survey Responses by County	Figure 1 shows that 50% of the survey respondents came from the County of LA. As such, the response are skewed and more LA-centric, which should be noted somewhere in this technical report when discussing survey results.



Table 15. TRANSPORTATION CONFORMITY ANALYSIS TECHNICAL REPORT COMMENTS

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

Table 16. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

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



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	p. 1, first paragraph	"However, the IJA expires in Fiscal Year (FY).. – specify it is "Federal" fiscal year.
8	Clarification	p. 1; 1. Introduction: Revenue sources	Page 1, third paragraph, states that "Efforts are underway to explore how we can transition from our current system based on fuel taxes towards a more direct system of user fees." This sentence seems to downplay/contradict a preceding sentence which recognizes that local sales tax revenues for transportation purposes generate 58% of the region's core revenues, and highway tolls an additional 8%, according to Figure 6, page 10. Perhaps revise the reference of "based on" to a more appropriate reference.
9	Clarification	p. 2 1. Introduction: Equity Considerations of User Rees	Page 2, first full paragraph, states that "SCAG further considers the potential equity concerns that accompany user fee policies and assumes mitigation measures such as the establishment of a mobility equity fund." Please clarify; in reviewing the mitigation measures in the Draft Program EIR, there does not seem to be any mitigation measure that addresses the equity considerations associated with any user-fee system of revenues (See PMM-TRA-2). Please also see related comments that are provided on the Draft Plan Equity Technical Report.
10	Clarification	P. 7, Sec 2.6 P. 9, Table 1 P. 16, Table 3.1 Core Revenues - Local	Section 2.6 acknowledged that local sales taxes for three counties will expire during the term of the Plan, including Orange County's Measure M in 2041. However, the core revenue forecast shown in Table 1 show a significant increase in funding in OC for the period of FY2045-2050 (\$25.1 billions in FY2045-2050 compared to \$18.3 billions in FY 2040-2044 and \$17.6 billions in FY2035-2039. Recommend providing clarifying information on the disproportionate increase and local sales taxes assumptions beyond their expiration. If a continuation of existing sales tax revenue (or other new taxes) is assumed through FY2045-2050, recommend categorizing this revenue under new reasonably available revenues to better illustrate the need to secure future funding.
11	General comment	p. 8, Appendix 1, p. 3	Core and Reasonably Available Revenues, identify federal, state and local sources of transportation funding for the plan and Highway Tolls identify toll road revenues and mitigation fees. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, and tolled express lane facilities that are privately funded are included in the plan and in the total cost of the plan. Accurately describing the extent of private funding is an important public disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.
12	Clarification	p. 11 & 12; Figure 8 3.1: Core Revenues Federal	The narrative on Federal sources of core revenues on page 11 states that FTA Formula and Discretionary funds cumulatively account for 61% of the federal funding for the SCAG region. Please confirm. In reviewing the referenced Figure 8, the sum of the two funds appears to be 58%.
13	Clarification	p. 12, 13 Tables 2-4 Table 3.4	a) This section of the technical report should include a figure, similar to Figures 1 through 8, that visually identify the amount of new revenue and the associated percentage of the total new revenues, that are being assumed and listed in Tables 2 - 4. And that per Figure 12 on page 33, new



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		3.2: New Reasonably Available Revenues: Mileage-Based User Fee (Replacement) vs Local Road Charge Program	revenues represent \$162.2 million or 22% of the Connect SoCal 2024 total revenues of \$750 billion. b) The narrative discussion on New Reasonably Available Revenues on page 13 could also warrant more clarifying explanation about the distinction between the Mileage-based User Fee (Replacement) and the Local Road Charge Program. Technically, both are mileage-based fee programs: summarize the distinctions that are discussed in Tables 2 and 4, to assist the reader who is not going to delve into the detail of those tables, yet recognizing that both fees could be imposed on the driver starting in 2035. c) Table 4 includes a risk assessment of the proposed new sources of funding. The information in Table 4 should be referenced in the narrative discussion on page 13, to inform the reader of the potential risk analysis that was conducted for each new funding source and the risk mitigation measures identified.
14	Clarification	P. 14-15, Table 2	While the number is available later in the report, Table 2 should include the total sum of new reasonably available revenue.
15	Clarification	p. 26 4. Expenditures	a) Page 26 of this section references a Figure 11 that represents the standardized template that the CTCs used to submit cost information for capital projects. Is it Figure 11 on page 32, or Figure 9 on page 26, that represents the standardized CTC template? b) Page 26 of this section references a Figure 12 to illustrate changes in California highway construction costs. Is it Figure 12 on page 33 or Figure 10 on page 21, that represents the change in California construction costs?
16	Clarification	P. 28, Table 5 P. 31, Table 6 Expenditure	Both Table 5 and Table 6 refer to service expansion. Recommend adding language that differentiates what is included in each table. For example, specify infrastructure and equipment required for service expansion in Table 5. Also clarify if operating costs are included in Table 6 as the text description before it only suggests system preservation and maintenance needs.
17	Correction	p. 29	Table 5, Highways, Add toll roads to HOV/Express Lanes/ Toll Roads . This change should also be made elsewhere in the main RTP/SCS document where highways and express lanes are discussed. Revise Description to include auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes, and Express/HOT lanes.
18	Clarification	p. 30, 31 4.3 MultiModal System Preservation and Maintenance	This section, second paragraph, outlines different factors that impact/damage roadways. One issue that has surfaced at SCAG policy committee meetings but which is not addressed herein, is the impact of EV vehicle weight on roadway pavement conditions. Please identify if this is a valid issue that merits discussion as a potential contributing factor to pavement distress during the 20+ year of the Plan.
19	Clarification	p. 30-31, Section 4.3 Multimodal System O&M	Descriptions in this section mainly focus on street preservation and only touch lightly on preservation of transit assets. The funding need for transit, however, is at least twice that of streets and roads. Suggest adding descriptions of existing transit needs (e.g. there are X number of buses and rail cars in our region that must be maintained in good working order as well as X miles of track infrastructure).
20	Clarification	p. 31, last paragraph	"... maintain exiting transit" should be "existing".



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
21	Clarification	p. 34-35, Table 7 Revenues	There is a significant increase in revenues between the 2040-44 and 2045-49 periods, greater than any other time period. The increase seems exaggerated and requires further verification and clarification. Is the disproportionate forecast due to inflationary increase?
22	Clarification	p. 7; Appendix 1, page 1 Local Option Sales Tax Measures	The overview of the local sales tax measures that are factored into the Local Core Revenue Sources, identifies that several county sales tax measures will expire during the forecast period of Connect SoCal 2024. Under the "Real Growth Rate" percentages by county in Appendix 1, would it be appropriate to further identify that this real growth rate is being applied up to the year of any applicable sales tax expiration? Also please note there is a duplicative sentence in the preceding paragraph, last sentence in Appendix 1.

TABLE 17. TRAVEL AND TOURISM TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Technical Report should consider highlighting/emphasizing opportunities for travel for bicycle/e-bicycle throughout (e.g. the need for bikeways, bicycle use to and from transportation stops/hubs and tourist destinations, the existing bicycle network).
2	General Comment	All pages	Add "2024" to all technical report page headers' titles
3	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
4	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	Correction	p. 1, Section 1	To address the CFR directive for the "continuous, cooperative, and comprehensive..."
8	General Comment	p. 1, Section 2	Expand the description for Lake Arrowhead like on Page 7.
9	Correction	p. 2, Section 2.2	Contradicting sentences: "Moreover, due to the size of the region and variety of places to visit and things to do, much of the traveler spending is generated by people living within the region." (1 st paragraph) "According to the Visit California 2021 Report, The Economic Impact of Travel, travel spending in the SCAG region totaled approximately \$46 billion, of which about \$41 billion was from people visiting from outside the region." (2 nd paragraph)



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Reword to clarify statements.
10	Correction	p. 3, Section 2.3	"From 2019 to 2020, after the onset of the COVID-19 Pandemic <u>pandemic</u> , travel spending in the region went down by 50 percent."
11	Correction	p. 8, Section 3.1.2	The title for the section includes Old Town Tustin but there is no example of Old Town Tustin in the list.
12	Correction	p. 10, Section 3.1.3	Three Eight of the 23 Cal State University campuses are in the SCAG region, Cal State Los Angeles, Cal State Long Beach, <u>Cal State Fullerton</u> , <u>Cal State Northridge</u> , <u>Cal State Dominguez Hills</u> , <u>Cal State Channel Islands</u> , <u>Cal State San Bernardino</u> , and Cal Poly Pomona. Why aren't private universities included, such as Chapman, Pepperdine, University of La Verne, and Loyola Marymount?
13	Correction	p. 10	3.1.4 Theme Parks and Movie Studios should probably read <u>Movie Studios</u>
14	Correction	p. 12; Bullet point #2 Bullet point #3 Bullet point #4 Bullet point #6	"National Football League" should be The Rose Bowl has hosted the National Football League (<u>NFL</u>) Super Bowl five times,...over the years." "The Coliseum has served as the home for the National Football League's (NFL) NFL's Rams and Raiders and is the current homefield home field for the USC Trojans." "It is home of MLS Los Angeles FC and the National Women's Soccer League's (<u>NWSL</u>) Angel City FC." "Opened in 1993 and formerly known as The Pond, the Honda Center is a an <u>multi-purpose</u> indoor arena located in Anaheim, CA."
15	Correction	p. 19	"...there a various programs and projects..." should read "...there <u>are</u> various programs and projects..."
16	Correction	p. 23, Section 4.3	On the second paragraph it looks like there was supposed to be an image added, but it only shows COBJ
17	Correction	p. 24	3 ^d bullet point, should "For the 2024 Coachella Music Festival..." read "For the <u>2023</u> Coachella Music Festival..."?
18	Correction	p. 25; Bullet point #1; first sentence	"The 2028 Summer Olympics...Metro and Caltrans, has developed a an LA 28 Games transportation plan.,"
19	General Comment	p. 26, Section 5.1	The fourth sentence is almost a repeat of the first sentence. Please delete or reword.
20	Correction	p. 27	Change "city and county boarders" to "city and county <u>borders</u> "
21	Correction	p. 29	Last paragraph, correct to read as "California Coastal <u>al</u> Commission"

DRAFT LETTER FOR DISCUSSION

January XX, 2024

Mr. Kome Ajise
Executive Director
Southern California Association of Governments
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ConnectSoCalPEIR@scag.ca.gov

Subject: Orange County Council of Governments Comments for Connect SoCal 2024 RTP/SCS and PEIR

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 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal 2024) and the associated Program Environmental Impact Report (PEIR). The draft 2024 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 2024 RTP/SCS, PEIR and related documents. The ad hoc committee includes representation from the OCCOG; the cities of Irvine, Laguna Beach, Mission Viejo, and Santa Ana; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; the Building Industry Association; and the Center for Demographic Research (CDR) at California State University Fullerton. This committee met six times during the public comment period, and has collectively spent well over two 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 full OCCOG Technical Advisory Committee at both the December and January meetings, and at a special meeting of the OCCOG Board of Directors that took place on January 11, 2024 and

serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2024 Connect SoCal Plan and PEIR and all associated technical reports. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 2. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2024 Connect SoCal Plan, PEIR, and associated documents.

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 January 2024 letter. OCTA has identified policy and technical issues related to the draft 2024 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. Connect SoCal consistency determinations

The Demographics and Growth Forecast Technical Report is currently the only document that contains language on Traffic Analysis Zone (TAZ) consistency—what has been referred to as the “TAZ disclaimer”. OCCOG is proposing updated language to clarify the limitations of the use of the growth forecast data and forecasted development pattern. OCCOG requests the updated language replace the current applicable language in the Demographics and Growth Forecast Technical Report—the only location it is currently used—and further requests the language be added to the main RTP/SCS document at the end of page 97, the Land Use & Communities Technical Report, and as a response to comments in the draft PEIR. The full text of the requested Consistency Language is included in Attachment 1 of this letter.

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

Insert data usage paragraph:

“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level ~~household and employment~~ growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. ~~They are advisory and non-binding because they are~~

~~developed only to conduct required modeling.~~ No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."

Recommendations: 1) Replace the Consistency Language in the Demographics and Growth Forecast Technical Report on page 45 with the language provided in Attachment 1. 2) Add the revised consistency language into the main Connect SoCal document starting on page 97. 3) Add the Consistency Language to the PEIR response to comments. 4) Add the revised consistency language into the Land Use and Communities Technical Report as Section 7.5. 5) Add the data usage paragraph to all growth forecast maps and figures reporting or depicting growth forecast, development patterns, or TAZ-level data (see attached matrix).

3. Priority Development Areas (PDAs)

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

4. Process Concerns

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform and clarify the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR. Despite OCCOG's ongoing and repeated efforts, there continues to be a disconnect between SCAG's constitution of and reliance on the Technical Working Group (TWG), comprised of planning staff from SCAG member agencies and experts across the region, and how members of the group would like to be consulted and provide advisement. 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. One request in this vein would be to engage the TWG on updating SCAG’s style guide to facilitate consistency across documents and publications and promote clarity and ease of comprehension across all levels of engagement.

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 and continued these for the 2024 process. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan. However, the proliferation of new meetings requires jurisdictions to have additional bandwidth to monitor and participate, and there has been little to no interaction from the issue-specific groups with the long-standing TWG. Coupled together this does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and continues to result in silos of information.

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 2028 cycle to allow for a more robust review process prior to the holidays—or even completion of the whole process before the holidays—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. This has been a long-standing concern since the 2012 RTP/SCS iteration where each Plan has been released near the holidays and the public comment period has covered holidays and closures that often make it difficult to find ample time for thorough technical review of the hundreds of pages of documents before comments are provided to governing boards for consideration to submit as official public comment. In this cycle, OCCOG has been forced to convene a special Board meeting simply to be able to offer our comments within the public comment window. Below are the dates from previous iterations that show the compressed timeline for both reviewers and SCAG’s response to comments—none of which allowed time for significant changes or updates to the documents after the public comment period.

RTP/SCS ITERATION				
	2024	2020	2016	2012
Regional Council approve release of DRAFT Connect SoCal document & PEIR to follow.	11/2/2023	11/7/2019	12/3/2015	12/1/2011
SCAG releases draft PEIR	11/9/2023	12/9/2019	12/4/2015	12/30/2011
Comment period closes	1/12/2024	1/24/2020	2/1/2016	2/14/2012
Release of final RTP/SCS & response to comments RTP/SCS	TBD	3/27/2020	3/14/2016	3/20/2012
Release of FINAL PEIR & response to comments	TBD	3/27/2020	3/18/2016	3/19/2012
RTP/SCS & PEIR approval	ETA 4/4/2024	COVID-19; 5/7/2020 & 9/3/2020	4/7/2016	4/4/2012
Length of RTP comment period	71	78	60	75

Length of PEIR comment period	64	46	59	46
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Allocate Ample Time for Robust Regional Council Discussion The RTP/SCS and PEIR are both topics that require considered debate and are likely to generate discussion among policy makers. In past iterations, discussion was cut off to accommodate some Regional Council members’ 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. Have the TWG discuss and provide technical report best practice guidance regarding the style guide used for SCAG’s documents and publications. Have liaisons from each subject-matter working group participate in the TWG and ensure TWG members are included in the distribution of materials from issue-specific working groups so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2028 cycle and release drafts six months earlier to ensure that there is adequate time after the initial draft is released to 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 two hours for a meeting.

5. Growth Forecast

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2024 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

OCCOG opposes any alternative in the PEIR that does not utilize local input provided through the local input/Local Data Exchange (LDX) process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction submitted by jurisdictions should not be utilized as the preferred alternative.

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

6. Remain Neutral on Technology

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

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

7. Maintain Unbiased, Objective Tone

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

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

8. "Can and Should"

As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they "can and should" be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures. 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 any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is overreaching. SCAG should therefore add the following qualifier subsequent to each use of "can and should": "where applicable and feasible".

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

9. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact, and the significance of the impact should be looked at after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If SCAG opts not to remove mitigation measures that restate existing regulation, then OCCOG requests that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken.

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

10. Provide Sources for All Graphics and Tables

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

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

SoCal-related documents. All related documents should also be branded with “Connect SoCal 2024” to differentiate from past and future iterations.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2024 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 three 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 opportunity to provide public comment, 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 2024 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 an RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me or Marnie Primmer, OCCOG Executive Director at (949) 698-2856 or marnie@occog.com.

Sincerely,

Wendy Bucknum
Chair
Orange County Council of Governments

Attachments:

1. Consistency language
2. Matrix of comments on Connect SoCal 2024, PEIR and Technical Reports

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCCOG TAC
OCTA Board of Directors
Orange County City Managers

ATTACHMENT 1:

Consistency language:

“In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.

The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.

SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.

Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.

For example, local jurisdictions' plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG's TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.

This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction's approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production's contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.

Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project's eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA)."



AGENDA ITEM # 3

SCAG Meeting Updates

STAFF RECOMMENDATION

Receive reports and discussion.

At the January 4th, 2024, SCAG Energy & Environment Committee (EEC) Meeting, SCAG staff presented the recommended data standards for the SoCal Greenprint, which was based on the guidance from the Greenprint TAC. The EEC recommended RC approval of the draft data standards subject to the revision of Draft Standard A4.

Proposed Standard A4 language:

Data input shall be created by and/or sponsored and used by regulatory agencies, state and/or federal agencies.

Revised Standard A4 language:

Data should be created, used and/or recommended for use by permitting agencies, and other state and federal agencies.

If approved by the RC, the recommended data standards will be included in the RAMP Policy Framework and shall be adhered to in the development and future updates of the SoCal Greenprint Tool.

Link to [January 4, 2024 EEC Agenda Packet](#)

Attachment 1: EEC Agenda Item 5 – Proposed SoCal Greenprint Data Standards Staff Report



AGENDA ITEM 5 REPORT

Southern California Association of Governments
January 4, 2024

To: Energy & Environment Committee (EEC)

EXECUTIVE DIRECTOR'S
APPROVAL

From: India Brookover, Senior Regional Planner
(213) 236-1919, brookover@scag.ca.gov

Subject: Proposed SoCal Greenprint Data Standards

Kome Ajise

RECOMMENDED ACTION:

Staff recommend that the Energy and Environment Committee recommends the Regional Council (RC) adopt the SoCal Greenprint Recommended Data Standards and update the SCAG Regional Advance Mitigation Program Policy Framework (RAMP Policy Framework).

STRATEGIC PLAN:

This item supports the following Strategic Plan Goal 3: Be the foremost data information hub for the region. 4: Provide innovative information and value-added services to enhance member agencies' planning and operations and promote regional collaboration.

EXECUTIVE SUMMARY:

SCAG is in the process of developing the SoCal Greenprint, a web-mapping application to help users make data-driven land use and transportation infrastructure decisions and support conservation investments and SCAG's Regional Advance Mitigation Program (RAMP) efforts. Directed by the Regional Council's adopted RAMP Policy Framework, SCAG established the Greenprint Technical Advisory Committee (GTAC) to advise staff on the development of data policies, governance standards, user guidelines, data selection criteria, and data parameters for the Greenprint tool.

In summary, key feedback from the GTAC process included:

- *The SoCal Greenprint should be a tool to identify conservation opportunities that can help mitigate transportation and development impacts and support advancing projects.*
- *The SoCal Greenprint Data Standards should ensure the perception of trustworthiness of data is the highest priority. Data should be updated and maintained regularly.*
- *SCAG should adopt a "start small" approach to compiling data for the SoCal Greenprint and incorporate Caltrans' Regional Advance Mitigation Needs Assessment (RAMNA) data layers, as well as data layers that are useful for state grant applications.*

- ***The SoCal Greenprint should include strong and prominent disclaimer language that conveys the intent of the tool, communicates clearly that local data may be more detailed and complete, and requires acknowledged by users prior to accessing the tool.***

With guidance from the GTAC, staff developed Recommended Data Standards for the SoCal Greenprint that include these key considerations and are further described in this staff report and in Attachment A.

If the Recommended Data Standards are advanced by the Energy and Environment Committee (EEC) and approved by the Regional Council (RC), the Recommended Data Standards will be included in the RAMP Policy Framework and shall be adhered to in the development and future updates of the SoCal Greenprint Tool.

BACKGROUND:

I. Regional Council Direction

SCAG is in the process of developing the SoCal Greenprint, a strategic web-based mapping tool to inform land use and infrastructure decisions, help users identify priority conservation areas, support advanced mitigation programs, and advance the vision and goals of Connect SoCal 2020, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). On October 7, 2021, the SCAG Regional Council (RC) directed SCAG staff to establish a policy framework for advance mitigation in the SCAG region and ensure Greenprint alignment with policy objectives. As a result of this direction, SCAG convened the 5-member Regional Advance Mitigation Task Group (RAMP-ATG) in 2022 to develop the policy framework for regional advance mitigation. The RAMP-ATG's resulting RAMP Policy Framework, approved by the RC on February 2nd, 2023, directed SCAG to form the Greenprint Technical Advisory Committee (GTAC) to advise on the development of the tool's data policies, governance standards, user guidelines, data selection criteria, and data parameters for the tool, collectively referred in this staff report as "Data Standards".

This staff report includes a summary of the feedback received from the GTAC and how it has informed the recommended action that is being presented to the Energy & Environment Committee (EEC) for consideration of advancement to the Regional Council for review and approval. As directed by the RAMP Policy Framework, the GTAC consisted of regional and local government agency representatives as well as one each from the business and environmental communities, and were held consistent with the Brown Act.

The GTAC process consisted of three advisory committee meetings, focus groups with staff from GTAC jurisdictions and other agencies to better understand their needs, and discussions with individual TAC members to answer questions, clarify and confirm feedback received during TAC meetings:

- Meeting #1 (July 26th) – This meeting included an overview of Greenprint and the role of the GTAC, extensive review and discussion of the RAMP-ATG data recommendations, and a Caltrans presentation on the data and data standards/processes that it utilizes in the agency's Regional Advance Mitigation Needs Assessments (RAMNA). Input from this meeting was utilized to create the first set of draft Data Standards.
- Meeting #2 (August 28th) – The second meeting was dedicated to review and discussion of these draft Data Standards.
- Meeting #3 (October 30th) – Staff integrated input from meeting #2 and the GTAC focus groups into updated draft Data Standards that were then utilized to evaluate potential data layers. The updated draft Data Standards and resulting proposed data list were shared prior to the meeting consistent with the Brown Act, and members discussed the content extensively during this meeting. Options for tool functionality were also presented and discussed, as well as next steps for further development of the SoCal Greenprint.

This feedback, along with additional input received from GTAC members through November 15th, 2023, informed the adjustments to the Recommended Data Standards, as well as the accompanying proposed data layer list and disclaimer language.

Key feedback from the GTAC process included:

- The SoCal Greenprint Data Standards and functionality should position the SoCal Greenprint to identify conservation opportunities that can help offset the impacts of transportation and other development projects, and support the advancement of projects.
- The SoCal Greenprint Data Standards should ensure the perception of trustworthiness of data is the highest priority.
- SCAG should adopt a “start small” approach to compiling data for the SoCal Greenprint and incorporate Caltrans RAMNA data layers and layers needed to apply for state grant programs.
- Data in the SoCal Greenprint should be regularly updated and maintained to reflect the latest available version.
- The SoCal Greenprint should include strong and prominent disclaimer language that must be acknowledged by users prior to using the tool, conveys the intent of the tool, and communicates clearly that local data may be more detailed and complete.

II. Recommended SoCal Greenprint Data Standards

The RAMP-ATG made five core data recommendations to inform the types of data, documentation, and utilization within the SoCal Greenprint:

- Data should be publicly available.
- Data should be created, funded, used, and/or developed in partnership with a government agency.
- Data should be regionally comprehensive.
- Data should not be depicted as “constraints” on future development or growth.
- Data should not be endorsed or adopted by the Regional Council as the official policy of the agency.

These five core recommendations were used as the foundational framework for GTAC discussions and were combined with the input received from members throughout the GTAC process to draft the Recommended Data Standards

Below is a summary of GTAC feedback and guidance received on the original RAMP-ATG recommendations, as well as SoCal Greenprint Recommended Data Standards that have been drafted to reflect and incorporate GTAC input. The full list of the Recommended Data Standards is included in Attachment A.

1. Data must be publicly available

Key GTAC Feedback:

- Not all publicly available data layers are the most accurate or reflect the most recent data.
- The definition of “publicly available” should be reviewed.

Recommended Data Standards that reflect these comments:

- *Standard A1:* Data included in the SoCal Greenprint tool must be publicly available, meaning that existing data layers are available online or can be accessed if requested and/or licensed.
- *Standard A2:* Data will consist of the most recent publicly available data and must include a defined set of metadata including information on authorship, geographic unit of accuracy, methodology for data development and anticipated timeline for regular updates.
- *Standard A3:* Draft data will not be included in the tool.

2. Data should be created, funded, used and/or developed in partnership with a government agency

Key GTAC Feedback:

- Data included needs to be standardized, transparent, documented, and originate from well-known sources so that users can be very confident and accurately informed about what it contains and the data quality.
- Data layers should be focused to include data developed or recommended by regulatory and other core agencies.

Recommended Data Standards that reflect these comments:

- *Standard A4:* Data input shall be created by and/or sponsored and used by regulatory agencies, state and/or federal agencies.
- *Standard A5:* Data depicted will not be altered from their original source.
- *Standard D2:* SCAG staff shall defer to feedback from regulatory agencies, and other state and federal agencies on the inclusion of particular data layers in the tool.

3. Data layers will be regionally comprehensive

GTAC Comments:

- County-specific information, like Ventura County Greenbelts and Save Open Space and Agricultural Resources (SOAR), are important for local decision making and ought to be included in the tool - even though these data layers are not regionally comprehensive.
- It will be important to identify, acknowledge, and explain data gaps to help users understand why data gaps exist, instead of omitting all data layers that have gaps - especially as most data layers contain gaps of some kind.

Recommended Data Standards that reflect these comments:

- *Standard A6:* Data layers will be regionally comprehensive to the extent feasible, unless data is locally important and not available through a regionally comprehensive source. Data gaps will be identified and explained for data layers in the tool to ensure accurate use of the information.

4. Data should be for informational purposes only and should not be shown as constraints on future development or endorsed or adopted as official policy of the agency

GTAC Comments:

- The SoCal Greenprint tool should explicitly state that the tool and data is intended for informational purposes only through a disclaimer and clickwrap statements, that it will not be considered or depicted as constraints on development, and that it is meant to facilitate access to already existing information.
- Data should help facilitate development by providing users with information to take into account at the beginning of processes and help inform next steps.

Recommended Data Standards that reflect these comments:

- *Standard A7:* Data is intended to be used for informational purposes only and not be identified, qualified, or defined as constraints on future development or land use. This shall be conveyed in the disclaimer language that users will be required to accept prior to accessing the tool.
- *Standard A8:* Data will be for informational purposes and will not be adopted by SCAG and are not an expression of regional policy.

- *Standard B1:* To convey limitations and foster its proper use as well as emphasize to users that the SoCal Greenprint tool is for informational purposes only with no legal effect on land-use decisions made by local agencies or property owners, the final, publicly available version of the tool will include a “popup screen” displaying disclosure language and will require user acknowledgment of the data’s limitations.
- *Standard B2:* Prior to using the tool, users will be required to acknowledge and agree to the terms of use, containing the aforementioned disclosures and data limitations, through a “clickwrap” statement that is reasonably and prominently visible to all users. This will require the active, affirmative acknowledgment of each user, and will be written to be easily understood by the average user.
- *Standard E1.* The SoCal Greenprint shall feature a glossary and methods section that will provide full transparency to users on the data layers featured (see attachment for full draft standard).
- *Standard E2:* Consistent with SCAG’s data policy, layers will include metadata consistent with the Geospatial Metadata Standards and Guidelines established by the Federal Geographic Data Committee (see attachment for full draft standard).

5. Process to select and maintain the data

GTAC Comments:

- Ensuring trustworthiness of data and the perception of trustworthiness of data is the highest priority.
- Data in the SoCal Greenprint should be regularly updated to reflect the latest available data.

Recommended Data Standards that reflect these comments:

- *Standard D1:* SCAG staff prioritize selection of data accessible through the tool by rigorously applying the foregoing data policies, governance standards, and user guidelines.
- *Standard D2:* SCAG staff shall defer to feedback from regulatory agencies, and other state and federal agencies on the inclusion of particular data layers in the tool.
- *Standard D3:* Data layers will be selected based on their value in supporting land use and transportation decision-making for local agencies, and regional advance mitigation.
- *Standard D4:* Data will be organized in seven thematic areas, which are aligned with feedback from county transportation commissions and local planning needs in support of RAMP:
 - Agriculture and Working Lands
 - Habitat and Biodiversity
 - Water Resources
 - Built Environment
 - Environmental Justice, Equity and Inclusion
 - Climate Vulnerabilities and Resilience
 - Geographic Context

- *Standard D5:* The Greenprint tool will include a data update process. The process will include review of data layers under consideration to ensure they abide by the adopted data standards, and then be advanced to the Energy and Environment Committee (EEC) for review. It will also include a review of existing data layers to verify whether they meet the adopted standards.

III. Application of Data Standards

A key theme of GTAC feedback was that staff should utilize a targeted, “start small” data approach in the SoCal Greenprint that includes identifying and evaluating layers from the Caltrans Regional Advance Mitigation Needs Assessment (RAMNA), an outcome of Caltrans’ Advanced Mitigation Program (AMP) to accelerate transportation project delivery, and additional layers that would be useful for grant applications.

The project consultant compared the draft Data Standards to similar tools and then applied the draft Data Standards to these identified data layers. Through this comparison, the consultant found the SoCal Greenprint will surpass other relevant available web mapping application standards and be a mechanism to ensure that data included in the tool is consistent, trustworthy, and secure.

The draft Data Standards relevant to data evaluation (A1-A6) were then applied to the RAMNA and funding data layers. Data layers that passed this evaluation were presented at the third meeting of the TAC for discussion, and members were then given two additional weeks to provide feedback after the conclusion of GTAC meeting #3. All data layers require some additional updating to meet the draft Data Standard relevant to metadata content, Data Standard A2. As such, additional work is being conducted by the consultant to bring them into compliance. In total, the Draft Proposed Data Layers List (Attachment B) includes 106 data layers. Assuming these layers can be brought into compliance, they would make up the data layer list to be included in the SoCal Greenprint. The process for maintaining and updating the data moving forward would be governed by Data Standards D1-D5.

The remaining Data Standards are relevant to the purpose of the data in the tool and how the purpose will be communicated/presented to users (A7-A8 and B1-B2), tool accessibility (C1), and data presentation within the tool (E1-E2).

IV. Draft Disclaimer Language

A particular focus of the GTAC discussions during and after Meeting #3 was on draft Data Standard A7. A7 establishes that data will be for informational purposes only and will not become a constraint on future development or land use. Feedback focused on adding language to more clearly express that the SoCal Greenprint and its data is intended for informational purposes only,

to support advance mitigation, and to help identify/inform opportunities to offset the impacts of transportation and development projects. This feedback is most relevant to Recommended Data Standards B1 and B2, which specify that the tool will include a “popup screen” and “clickwrap” statement that users will be required to acknowledge. These will include disclaimer language that clearly illustrates the purpose, intent, and limitations of the SoCal Greenprint. This acknowledgement will need to occur for users to access the tool as well as export data.

SoCal Greenprint staff worked with SCAG’s legal team after the conclusion of the GTAC process to develop the following draft disclaimer language that incorporates GTAC feedback for inclusion in this staff report. The bolded language indicates language that was specifically included in the disclaimer to reflect GTAC feedback, while remaining within the limits of SCAG’s authority.

The SoCal Greenprint is an informational data mapping tool created by the Southern California Association of Governments (SCAG) that provides third party users with the ability to create interactive maps and customized reports by selecting and combining data layers from publicly available and pre-existing data sources. SCAG makes no representation or warranties regarding the accuracy of the SoCal Greenprint data sources nor assumes any liability for its use – the user assumes all risk of use. **SCAG does not intend for Greenprint data to supersede any local land use information as SCAG has no land use authority to impose the use of Greenprint data.** All maps and reports created by users (1) are purely informational and reflective of data that is already existing and public information; (2) carry no regulatory weight or authority; and (3) should not be relied on or used as a definitive source of all information that may be available about a location (**SCAG defers to local jurisdictions which may have more complete information**). If you understand and agree to these terms, Connect to Greenprint.

Staff also made adjustments to draft Data Standard A7 to indicate that the disclaimer language and its presentation in the tool functions as the vehicle for indicating the purpose and intent of SoCal Greenprint to users.

The Recommended Data Standards, included in Attachment A, incorporate feedback from throughout the GTAC process for consideration by the EEC.

FISCAL IMPACT:

This project is funded in the Fiscal Year 2023-24 Overall Work Program (OWP) under project/task 290-4919.01 (Regional Advanced Mitigation Program Development).

ATTACHMENT(S):

1. Attachment A - Proposed Data Standards_CLEAN
2. Attachment B - Proposed Data Layers
3. PowerPoint Presentation - Greenprint

ATTACHMENT A: Recommended Data Standards

A. Recommended Data Evaluation and Purpose Standards

Data Policies address the requirements for data inclusion in the SoCal Greenprint so that the tool aligns with the RAMP Policy Framework.

- A1. Data included in the SoCal Greenprint must be publicly available, meaning that existing data layers are available online or can be accessed if requested and/or licensed.
- A2. Data will consist of the most recent publicly available data and must include a defined set of metadata including information on authorship, geographic unit of accuracy, methodology for data development and anticipated timeline for regular updates.
- A3. Draft data will not be included in the tool.
- A4. Data input shall be created by and/or sponsored and used by regulatory agencies, state and/or federal agencies.
- A5. Data depicted will not be altered from their original source.
- A6. Data layers will be regionally comprehensive to the extent feasible, unless data is locally important and not available through a regionally comprehensive source. Data gaps will be identified and explained for data layers in the tool to ensure accurate use of the information.
- A7. Data is intended to be used for informational purposes only and not be identified, qualified, or defined as constraints on future development or land use. This shall be conveyed in the disclaimer language that users will be required to accept prior to accessing the tool.
- A8. Data will be for informational purposes and will not be adopted by SCAG and are not an expression of regional policy.

B. Recommended Data Governance Standards:

Data governance standards address how SCAG will convey the purpose and limitations of data.

- B1. To convey limitations and foster its proper use as well as emphasize to users that the SoCal Greenprint tool is for informational purposes only with no legal effect on land-use decisions made by local agencies or property owners, the final, publicly available version of the tool will include a “popup screen” displaying disclosure language and will require user acknowledgment of the data’s limitations.
- B2. Prior to using the tool, users will be required to acknowledge and agree to the terms of use, containing the aforementioned disclosures and data limitations, through a “clickwrap” statement that is reasonably and prominently visible to all users. This will require the active, affirmative acknowledgement of each user, and will be written to be easily understood by the average user.

C. Recommended Data User Guidelines Standards:

User guidelines describe how the tool will be accessible, consistent with the Connect SoCal 2020 PEIR mitigation measure, the SoCal Greenprint should be web-based and easily accessible for municipalities, transportation agencies, researchers, developers, and conservation groups.

- C1. The SoCal Greenprint will be web-based and easily accessible.

D. Recommended Data Selection Criteria Standards:

Data selection criteria deals with how data is selected and updated in the SoCal Greenprint.

- D1. SCAG staff will prioritize selection of data accessible through the tool by rigorously applying the foregoing data policies, governance standards, and user guidelines.
- D2. SCAG staff shall defer to feedback from regulatory agencies, and other state and federal agencies on the inclusion of particular data layers in the tool.
- D3. Data layers will be selected based on their value in supporting land use and transportation decision-making for local agencies, and regional advance mitigation.
- D4. Data will be organized in seven thematic areas, which are aligned with feedback from county transportation commissions and local planning needs in support of RAMP:
 - Agriculture and Working Lands
 - Habitat and Biodiversity
 - Water Resources
 - Built Environment
 - Environmental Justice, Equity and Inclusion
 - Climate Vulnerabilities and Resilience
 - Geographic Context
- D5. The Greenprint tool will include a data update process. The process will include review of data layers under consideration to ensure they abide by the adopted data standards and then be advanced to the Energy and Environment Committee (EEC) for review. It will also include a review of existing data layers to verify whether they continue to meet the adopted standards.

E. Recommended Data Parameter Requirement Standards:

Data parameter requirements address how the data in the SoCal Greenprint will be documented and how user limitations for each data set will be conveyed. Consistent with SCAG's past and current practice, all data layers included in the SoCal Greenprint will feature individual background information on methods, limitations, authorship, as well as guidance on their proper use, including:

- E1. The SoCal Greenprint shall feature a glossary and methods section that will provide full transparency to users on data layers featured, and will include:
 - Narrative definitions that cite the data sources, explain the data in accurate and user-friendly terms, and offer guidance on how the information should be used.
 - A description of the data's methodology, reporting framework, known data gaps, and processing methods used to develop the data.
 - Data layer names and URLs of original data sources.
 - Data creation date and anticipated update schedules.
 - Geographic constraints identifying the geographic unit of accuracy for the data layer. In some instances, data is accurate at larger areas but is not accurate when zoomed in to a smaller geography. For these instances, users will not be able to view data in finer detail than the minimum level of geographic accuracy, which will be documented in the tool.
- E2. Consistent with SCAG's data policy, layers will include metadata consistent with the Geospatial Metadata Standards and Guidelines established by the Federal Geographic Data Committee (FGDC):

- Identification information (originator, publication date, title, abstract, purpose, time period for content, currentness, progress, maintenance, etc.).
- Data quality information (attribute accuracy, completeness, positional accuracy, etc.).
- Spatial data organization information (indirect spatial reference for locating data without using coordinates).
- Spatial reference information (geographic coordinate system, latitude and longitude, etc.).
- Entity and attribute information (detailed description of data layer, overview description, attribute domain values, known data gaps, etc.).
- Distribution information (contact information for the individual or organization that distributes the data, a statement of liability assumed by the distributing individual or organization).
- Metadata reference information (date metadata was written, contact information for the metadata author, metadata standard, metadata access constraints, metadata use constraints).



AGENDA ITEM # 4

REAP Grant Application Update

STAFF RECOMMENDATION

Receive and file.

SUMMARY

Staff received extensive feedback from SCAG on OCCOG's REAP 2.0 application, which was submitted in June 2023, with a second round of comments placing a heavier emphasis on actionable outcomes. Staff worked closely with SCAG to revise the application to reframe and create stronger connections between tasks to ensure the application meets all eligibility criteria.

The TAC had the opportunity to provide feedback to OCCOG through a survey on REAP 2.0 projects. The intent of the survey is to help OCCOG revise our REAP 2.0 application to strengthen our prospective projects, including continuing the On-Call Services bench, Zoning Code and Housing Ordinance Technical Assistance, Housing Element Implementation support, and Anti-Displacement Policy Best Practices, among other prospective tools, in a way that is beneficial for all OCCOG jurisdictions.

We received 13 responses to the survey, with the majority wanting to participate in REAP 2.0, as well as multiple jurisdictions requesting help implementing their housing elements and expressing the need for pre-reviewed Missing Middle Housing Plans. There were also additional comments provided about wanting an expansion of the objective design guidelines and having challenges with infill projects and the resulting parking impacts. These survey responses were incorporated into the revised REAP 2.0 application to SCAG, attached for discussion purposes.

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