

COMMUNITY INPUT

PUBLIC PARTICIPATION AND CONSULTATION

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



APPENDIX 2

COMMENTS AND RESPONSES
ADOPTED ON SEPTEMBER 3, 2020

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COMMENTS AND RESPONSES

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Comments and Responses

SCAG released the Draft Connect SoCal, also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS” or “Plan”) for a comment period of over 60-days, which began on November 14, 2019 and ended on January 24, 2020. The public review and comment period completes more than three years of dialogue and consultation on this planning effort. During the public review and comment period, SCAG conducted a large-scale outreach campaign throughout the six-county region to educate and solicit feedback on the Plan. Throughout the public comment period, SCAG held 21 elected official briefings (which were also open to the public), one tele-town hall, one webinar, and three public hearings which were video-conferenced simultaneously to the five regional offices to make them more accessible to residents throughout the region. All of the materials for the briefings, public hearings, and workshops have been posted on the Connect SoCal website.

SCAG encouraged the public and interested parties to comment on the Plan at the aforementioned outreach events and through the online commenting form, regular mail, and email. SCAG received 107 separate communications (both oral and written) containing over 1,800 comments on the Draft Connect SoCal. A total of 81 comments were received from agencies/organizations and 26 were received from individuals. We appreciate and thank those who provided comments on the Draft Connect SoCal.

Below are the “Connect SoCal Comments and Responses,” which include written comments received by SCAG during the public comment period and SCAG staff’s responses to the comments. A Master Response No. 1 related to the Regional Housing Needs Assessment, which is referenced in responses to relevant comments, is also provided below.

MASTER RESPONSE NO. 1: REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)

BACKGROUND

While Connect SoCal is required under state planning law to identify areas sufficient to house the 8-year RHNA need pursuant to Government Code Section 65080(b)(2)(B)(iii), it's important to recognize that the RHNA allocation of housing need is a distinct and separate process set forth under state housing law, Government Code Section 65584 *et seq.* The RHNA requirements address the mandate to plan for housing units to further statutory objectives. The RHNA establishes “minimum housing development capacity that cities and counties are to make available via their land use powers to accommodate growth within a planning period.”¹

The 2016-2045 Growth Forecast undergirding Connect SoCal provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the SCAG region given demographic and economic trends, and existing local and regional policy priorities. The Connect SoCal Growth Forecast begins with an assessment of regional demographic and economic trends and uses a variety of spatially-explicit data sources—including local land use plans—to assess where growth is most likely to occur within the region, emphasizing a balance between future employment, population, and households. Between November 2017 and October 2018, SCAG staff met one-on-one with all 197 local jurisdictions in the region to solicit additional information for improving the accuracy of the preliminary forecast at several intervals (2016, 2020, 2030, 2035, and 2045). Further refinements were made at the small area level to reflect regional sustainability goals and policies through the scenario development process.

The legislative changes of 2018 modified the nature of the regional housing need determination for the 6th Cycle RHNA. Specifically, Government Code

65584.01(b) *et seq.* explicitly added measures of household overcrowding and housing cost burden to the list of factors to be considered by the California Department of Housing and Community Development (HCD) for the determination of housing need. These new measures (overcrowding and cost burden) are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”).

Thus, the 6th Cycle RHNA regional housing need total of 1,341,827, as determined by HCD, consists of both “projected need,” which is intended to accommodate the growth of population and households during the 6th Cycle RHNA (2021-2029), as well as “existing need.” On January 13, 2020, HCD's finding that SCAG's draft RHNA methodology furthered the statutory objectives of RHNA reflected that the determination is separated into “projected need” and “existing need” components. On March 5, 2020, SCAG Regional Council adopted the draft RHNA methodology as the final methodology for the 6th Cycle RHNA.

CONNECT SOCIAL AND THE 6TH CYCLE RHNA

The RHNA identifies anticipated *housing need* over a specified eight-year period and requires that local jurisdictions make available sufficient *zoned capacity* to accommodate this need. Actual housing production depends on a variety of factors external to the identification of need through RHNA—local jurisdictions frequently have sufficient zoned capacity but actual housing construction depends on market and other external forces. For example, per HCD's most recent Annual Progress Reports covering new unit permits through 2018, the region's low and very-low income permits totaled 19,328 units (2,494/year) compared to the RHNA allocation of 165,579 units (21,365/year). In contrast, the Connect SoCal Growth Forecast is an assessment of the reasonably foreseeable future pattern of growth given, among other factors described above, the availability of *zoned capacity*.

¹ Concurrence in Senate Amendments, AB 1771 (Bloom), as amended August 24, 2018 Comments at p.4 (Original Committee Reference: H. & C.D.).

“PROJECTED NEED” PORTION OF THE 6TH CYCLE RHNA

The “projected need” portion of the 6th Cycle RHNA is derived from the Connect SoCal Growth Forecast. Specifically, the Connect SoCal Growth Forecast projects 469,725 additional households in the SCAG region over 2021-2029 (Growth Forecast prorated for the 8.25-year RHNA planning period). After subtracting an estimate of household growth occurring on tribal lands (2,767), the remaining 466,958 households represent occupied housing units, to which are added two adjustment factors: vacancy need (14,467 units) and replacement needs (23,545 units) to yield a total of 504,970 housing units reflecting “projected need” for the 6th Cycle RHNA.²

Since only occupied housing units (households) generate travel demand, they are the primary focus of Connect SoCal’s analysis. Additional housing units (to account for vacancy need and replacement need) associated with this household projection will be accommodated by local jurisdictions within the same areas.

² For more information, see the Regional Housing Need section of the SCS Technical Report.

TABLE 1 Relationship between Regional Forecasted Households and RHNA “Projected Need”

Projected Household Growth, 7/2021 – 10/2029	469,725
Tribal Land Growth Estimate	-2,767
Vacancy Need	+14,467
Replacement Need	+23,545
Housing Unit Need to Accommodate Projected Growth (“Projected Need”)	504,970

Connect SoCal identifies areas within the SCAG region sufficient to house all the population in the region, including the projected population growth of 3.7 million and household growth of 1.6 million through 2045, the plan horizon year (see Table 5 and Exhibit 1 in the Sustainable Communities Strategy (SCS) Technical Report and Table 13 of the Demographics & Growth Forecast Technical Report). The same areas sufficient to accommodate all the region’s household growth through 2045 will also be sufficient to accommodate the eight-year projection or the “projected need” portion (504,970 units) of the 6th Cycle (2021- 2029) RHNA.

Accordingly, Connect SoCal meets state planning law requirements, specifically Government Code 65080(b)(2)(B)(ii) and (iii) which require that Connect SoCal’s Sustainable Communities Strategy shall:

- (ii.) Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth
- (iii.) Identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584

“EXISTING NEED” PORTION OF THE 6TH CYCLE RHNA

In accordance with Government Code Section 65080(b)(2)(B)(iii), as discussed above, Connect SoCal’s SCS identifies areas within the region sufficient to house an eight-year *projection* of the RHNA need, meaning the “projected need” portion (504,970 units) of the 6th Cycle (2021- 2029) RHNA. State planning law does not explicitly require the SCS to identify areas in the region sufficient to house the “existing need” portion of the RHNA. Additionally, for the reasons discussed in this section, existing need could not be reflected within Connect SoCal or the PEIR.

In HCD's January 13, 2020 letter finding that SCAG's draft RHNA methodology furthered the statutory objectives of RHNA, HCD identifies the "existing need" as 836,857 units which equals the total regional housing need (1,341,827 units) minus the projected need (504,970 units). The existing need primarily reflects regional measures of overcrowding, cost burden and vacancy.

The 6th Cycle RHNA allocation at the jurisdiction level will not be finalized until October 2020 following an appeals process which may result in changes to the RHNA at the jurisdictional level. Following adoption of SCAG's Final RHNA allocation in October 2020, local jurisdictions must update their housing elements (as needed) to provide sufficient zoned capacity for the total 6th Cycle allocation pursuant to state guidelines. Updated housing elements are due in October 2021. The updated housing elements must identify specific locations where potential new housing can be accommodated. Pursuant to Government Code Section 65583(c)(1)(A), local jurisdictions will have until January 2025 to complete any necessary rezoning to accommodate their RHNA allocation. Until this planning work is done at the local level, it would be speculative for Connect SoCal to make assumptions about potential development levels and patterns that includes the 6th Cycle "existing need."

As discussed above, SCAG's RTP/SCS Growth Forecast process always incorporates extensive input and data including the most up-to-date local land use information, policy responses, demographic, and economic data in order to determine the most likely future pattern of regional growth. As such, the information necessary to assess the feasibility, quantity, and location of additional household growth stemming from the 6th Cycle of RHNA's "existing need" allocation will not be available until October 2021 at the earliest and likely later than that for some jurisdictions. Additionally, the identified "existing need" portion of the 6th Cycle RHNA does not impact the region's projected population used in the SCS, as the "existing need" addresses additional latent housing needs in the existing population rather than implying future population growth. For these reasons, the "existing need" cannot be reflected in Connect SoCal.

However, as part of the RHNA process, SCAG will allocate total regional housing need ("existing need" and "projected need") consistent with the SCS. SCAG's adopted RHNA methodology for allocating "existing need" focuses on transit

and job access (i.e., assign 50% based on jurisdiction's share of the region's population within HQTAs and 50% based on a jurisdiction's share of the region's jobs that can be accessed within a 30-min commute) which is aligned with the strategies and policies underlying the regional development pattern in the SCS. As such, in compliance with Government Code Section 65584.04(m)(1), SCAG will allocate the "existing need" (as well as the "projected need") as part of the total RHNA determination consistent with the development pattern in the SCS.

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Connect SoCal Comments and Responses

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<i>Submitted by</i>	Alliance for a Regional Solution to Airport Congestion	Submittal 0001438 Related Documents Link
0001438.01.1	<p>Since 1995, ARSAC has advocated for the increased utilization of unconstrained underserved or unserved outlying regional airports such as Ontario and Palmdale to meet Southern California’s airport capacity needs instead of expanding LAX. ARSAC supports a safe, secure, modern and convenient LAX. LAX, the dominant SoCal airport, is limited in operational land and is in a very congested airspace. In 2016, ARSAC negotiated a second legal settlement to extend the 153 gate cap by four additional years through December 31, 2024. The gate cap is based upon Aircraft Design Group III sized aircraft comprised of the narrow body mainline aircraft such as the Airbus A320 and Boeing 737 series commercial airplanes. LAX is currently the largest public works project in Los Angeles County.</p>	<p>Comment noted. As a metropolitan planning organization (MPO), SCAG is primarily a surface transportation planning agency, and is not a regulatory or implementing agency, particularly as it relates to airports and airspace. As discussed in the subsection “MPOs have no authority over airport development”, MPOs ultimately have no planning, regulatory, or operational authority over the airports, including Los Angeles International Airport (LAX). Moreover, airports are not required to incorporate MPO planning recommendations into their capital plans, and Federal Aviation Administration (FAA) funding decisions are not tied to MPO RTP recommendations. As for the prospects of regionalizing the SCAG region aviation system, there are limitations due to the fact that SCAG has no regulatory or operational authority over the region’s airports, FAA has no authority over airline airport choice, and air passengers ultimately make their airport choice decisions based on market factors (e.g. price, number of flights). Although air navigation and airspace regulation fall under the jurisdiction of the Federal Aviation Administration (FAA), following the Airline Deregulation Act of 1978, the FAA has no authority over airline routes (i.e. airport choice). Therefore, the FAA has limited authority or influence over airline airport choice, and ultimately, airlines and passengers choose airports based on economic factors (please see The Airline Deregulation Act of 1978 and ACRP Report 98: Understanding Airline and Passenger Choice in Multi-Airport Regions for more information). However, as noted in the Aviation and Airport Ground Access, and Passenger Rail Technical Reports, SCAG is working with the airports, and transportation commissions and agencies, to connect passengers to the different airports in the region, including Ontario and Palmdale. Improved transit and rail access to the airports should both reduce congestion on the surface transportation system, and increase airport options for air passengers.</p>
0001438.01.2	<p>ARSAC is disappointed with the PEIR:1. The outreach for public comment appears to very limited.2. The time for public comment is too short. The PEIR was released in December when most people are paying attention to the holidays and not public policy. SCAG should extend the comment period an additional 45 days and provide lots of publicity to encourage public comment.3. The content of the PEIR appears to be thinner in scope than in the past, especially the Aviation Element. Instead of doing the RTP right, it appears as “RTP Lite.”</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001438.01.3	<p>The draft document repeatedly states its lack of authority to mandate actions. SCAG can be a much stronger contributor to the economic and environmental development of this region by providing increased guidance for transportation priorities. It provides extensive housing priorities and goals and to increase mass transportation to reduce vehicle miles travelled. It appears to favor “active transportation” such as bikes and scooters but fails to project how will be used to generate meaningful data resulting in congestion improvement.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	Alliance for a Regional Solution to Airport Congestion	Submittal 0001438 Related Documents Link
0001438.02.1	ARSAC strongly agrees with the five decade old principle that our airport system must provide a regional accommodation to travelers and cargo.	Comment noted. The prospects of regionalizing the SCAG region aviation system are somewhat limited due to the fact that SCAG has no regulatory or operational authority over the region’s airports, FAA has no authority over airline airport choice, and air passengers ultimately make their airport choice decisions based on market factors (e.g. price, number of flights). As discussed in the subsection “MPOs have no authority over airport development”, MPOs ultimately have no planning or regulatory authority over the airports. Air navigation and airspace regulation fall under the jurisdiction of the Federal Aviation Administration (FAA). However, following the Airline Deregulation Act of 1978, the FAA has no authority over airline routes (i.e. airport choice). Therefore, the FAA has limited authority or influence over airline airport choice, and ultimately, airlines and passengers choose airports based on economic factors (please see The Airline Deregulation Act of 1978 and ACRP Report 98: Understanding Airline and Passenger Choice in Multi-Airport Regions for more information). However, as noted in the Aviation and Airport Ground Access, and Passenger Rail Technical Reports, SCAG is working with the airports, and transportation commissions and agencies, to connect passengers to the different airports in the region. Improved transit and rail access to the airports should both reduce congestion on the surface transportation system, and increase airport options for air passengers.
0001438.02.2	Mass transit train stations and buses must be built to support our airport system.	Connect SoCal includes investments in infrastructure to construct rail stations to directly serve our region's airports. These include the fully funded and under construction 96th St. station by the Los Angeles County Metropolitan Transportation Authority (Metro) to be served by the Metro Green and Crenshaw Lines, providing a connection to Los Angeles International Airport via an Automated People Mover to be constructed by the airport. Connect SoCal also includes a direct rail connection from the Metrolink San Bernardino Line to directly serve Ontario International Airport (ONT).
0001438.02.4	Much of the RTP discusses “livable communities” in which single vehicle traffic is discouraged for densified communities. The call for active mobility choices with inadequate parking may serve local communities, but this will not work well for travelers who generally have luggage.	Comment noted. Improvements to bicycle infrastructure align with the Connect SoCal goal to “Improve mobility, accessibility, reliability, and travel safety for people and goods.”
0001438.02.5	Bike centric projects may increase active transportation alternatives but it also reduces vehicle capacity and slows down vehicle traffic resulting in increased GHG.	Comment noted. Improvements to bicycle infrastructure align with the Connect SoCal goal to “Improve mobility, accessibility, reliability, and travel safety for people and goods.”
0001438.03	Traffic around LAX is legendary. Despite all of the major changes proposed we expect that “Every day will be like Thanksgiving gridlock” if the increased projection of 127 Million Annual Passengers (MAP) occurs. No documentation is provided anywhere in the RTP to validate that this 35% increase from current gridlock can be accommodated within or around LAX. ARSAC strongly encourages data collection and analysis activity to highlight the sources of passengers and to encourage airlines to offer flights at airports most convenient to travelers. SCAG congestion analyses and “transportation analysis zones” around airports must be detailed enough to identify potential action for improvements not only at end of the planning period of 2045, but also incrementally to match changes within airport areas. When will this data be used? If it is only for 2045, then it will be too late.	Comment noted. Connect SoCal recognizes the traffic challenges that exist around LAX. Significant improvements (including LAMP projects) in and around LAX that should improve airport access as well as circulation are proposed and incorporated in the Connect SoCal. Future year (2045) regional traffic analysis assumes these improvements that collectively result in VMT reduction and delay improvements at a regional scale. However, it is outside the scope of analysis of the Connect SoCal to analyze localized impacts of airport operation or any other major traffic generator. It is possible, should funding and opportunity arise in the future, SCAG could collaborate with LAWA, LA Metro and Caltrans to conduct more comprehensive and localized traffic impact analysis on the regional network around LAX due to future airport operation.

ID	Comment	Response
<i>Submitted by</i>	Alliance for a Regional Solution to Airport Congestion	Submittal 0001438 Related Documents Link
0001438.04	<p>In this RTP, SCAG seems to have backed away from 5 decades of advocacy for regional accommodation of commercial aviation needs. The wording, “Regionalization” in reference to Aviation is absent from the draft despite its critical importance to ensuring optimum access and emergency back up for both natural and man-made disasters. The definition of regionalization has been crafted by ARSAC and the cities of Inglewood and Culver City in 2011 which SCAG should consider adopting: “Regionalization is the proactive redistribution of a portion of Southern California’s aviation demand to unconstrained airports in the Southern California region other than LAX, in order to achieve a more equitable and proportional allocation of airport growth and aircraft operations among the airports, reduce congestion, increase safety, and minimize vehicle miles traveled, with consequent benefits to both the environment and the economy.” ARSAC was part of the coalition to “SetOntario Free” whereby Ontario International Airport (ONT) ownership and management returned to local control. ONT has been dramatically increasing domestic service and adding new long-haul international service such as Taipei, Republic of China. ONT is a great example of airport regionalization in Southern California.</p>	<p>Comment noted. Historically, SCAG has been supportive of regionalization of aviation demand. However, as a planning agency with no regulatory or operational authority over the region’s airports SCAG’s ability to effectuate regionalization is rather limited. Furthermore, FAA has no authority over airline airport choice, and air passengers ultimately make their airport choice decisions based on market factors (e.g. price, number of flights). Air navigation and airspace regulation fall under the jurisdiction of the Federal Aviation Administration (FAA). However, following the Airline Deregulation Act of 1978, the FAA has no authority over airline routes (i.e. airport choice). Therefore, the FAA has limited authority or influence over airline airport choice, and ultimately, airlines and passengers choose airports based on economic factors (please see The Airline Deregulation Act of 1978 and ACRP Report 98: Understanding Airline and Passenger Choice in Multi-Airport Regions for more information). However, as noted in the Aviation and Airport Ground Access, and Passenger Rail Technical Reports, SCAG is working with the airports, and transportation commissions and agencies, to connect passengers to the different airports in the region. Improved transit and rail access to the airports should both reduce congestion on the surface transportation system, and increase airport options for air passengers.</p>
0001438.05	<p>We agree with the RTP statement: “SCAG has and will continue to play a role in terms of aviation systems research, planning, and analysis, as well as encouraging collaboration and communication amongst the region’s aviation stakeholders.” As the federally recognized Metropolitan Planning Organization (MPO) for Southern California and its ability to prioritize ground transportation dollars, SCAG must do more to help underutilized regional airports become more attractive for airline service by providing easy access by road, rail (Metrorail, Metrolink, Amtrak, High Speed Rail such as Brightline/Virgin Trains) and other mass transit. Part of Southern California’s freeway congestion problems stems from leakage of passengers from one airport catchment area (natural marketing area) to other airports causing millions of extra vehicle miles traveled. All of Palmdale Regional Airport’s possible passengers are forced to drive to Hollywood-Burbank (BUR), Ontario International (ONT) or Los Angeles International (LAX) to catch a flight. LAX has 70% of the region’s flights including 95% of the international flights. While it is not possible to accommodate all leakage from one catchment area to another, without airline service at places such as PMD freeway congestion will continue to increase. SCAG must work with airports in the region to have ground access projects prioritized. SCAG must re-commit itself to making airport regionalization a reality.</p>	<p>Comment noted. Airport ground access improvement projects identified in the Connect SoCal for each of the regional airports are based on the most current information available to SCAG and was developed through consultation and collaboration with the concerned airport authorities and the County Transportation Commissions. In addition to the airports, SCAG regularly works with Metro, Metrolink, the Orange County Transportation Authority, and the San Bernardino County Transportation Authority, and other transportation commissions and agencies, on transit and rail connections to the airports. In addition to the airport transit and rail projects highlighted in the Aviation and Airport Ground Access Technical Report, you can also find a subsection on “Airport Ground Access” in the Passenger Rail Technical Report. This section contains additional information on the Measure M funded Los Angeles World Airports (LAWA) Automated People Mover (APM) project, the possible Metrolink San Bernardino Line and Metro Gold Line extensions to Ontario International Airport (ONT), and the Hollywood Burbank Airport North Antelope Valley Line Metrolink Station. Specifically regarding ONT, the San Bernardino County Transportation Agency (SBCTA) completed an ONT ground access study in 2015. The San Bernardino and Riverside Metrolink Lines, as well as the Amtrak Sunset Limited Lines, operate in close proximity to ONT. Once extended to Montclair, the Metro Gold Line offers another potential transit option to ONT.</p>

ID	Comment	Response
<i>Submitted by</i>	Alliance for a Regional Solution to Airport Congestion	Submittal 0001438 Related Documents Link
0001438.06.1	In the RTP, some airports having commercial jet service are designated “Reliever Airports”. Were these “Reliever Airports” included in calculations such as Air Quality, Green House Gas Emissions, Noise, etc.???	Commented noted. The monitoring of airport air quality falls under the jurisdiction of the California Air Resources Board (CARB) and the South Coast Air Quality Management District (AQMD). Please consult CARB and the South Coast AQMD for more information on the airport Air Quality Improvement Plans (AQIP) and the airport air quality Memoranda of Understanding (MOU). The monitoring and regulation of airport and aircraft noise falls under the jurisdiction of the Federal Aviation Administration (FAA) and the individual airports. Please consult the FAA Airport Noise Program for more information. As discussed in the subsection “MPOs have no authority over airport development”, although an MPO can play a collaborative and consultative role with the airports and the FAA, MPOs ultimately have no planning, operational, or regulatory authority over the airports or airspace planning. However, auto and truck traffic going to and from the airports is factored into the regional model, and moreover, the regional auto and truck traffic is accounted for in the SCAG Travel Demand Model on the corridor and network level. Please see the “Analytical Approach” section of the Transportation Conformity Technical Report for more information on the SCAG model assumptions and inputs.
0001438.06.2	Additional information that should be included in the RTP about “reliever airports”: 1. March Inland Port (RIV). As of 2018, Amazon Air has 6 cargo flights per day. Reference: https://en.wikipedia.org/wiki/March_Air_Reserve_Base 2. Palmdale Regional Airport (PMD). PMD has charter Boeing 737 flights to support US Defense projects such as the B-21 bomber program. The City of Palmdale is in the planning process to build a new passenger terminal on the northwest corner of Air Force Plant 42 (southeast corner of Sierra Highway and Avenue M). This location is adjacent to the Metrolink Antelope Valley Line and would be perfect for a train station stop to make PMD an intermodal and multimodal facility. Virgin Trains USA could also make this a station. Reference 1: https://en.wikipedia.org/wiki/Palmdale_Regional_Airport Reference 2: https://cityofpalmdale.org/DocumentCenter/View/5858/Palmdale-Regional-Airport-Facts-and-Figures-PDF?bidId= Reference 3: https://www.avpress.com/news/palmdale-explores-return-of-service-toairport/ article_c0ffc290-bbf9-11e9-8a1a-7fd9889b4667.html	Comment noted. March Inland Port (RIV) and Palmdale Regional Airport (PMD) are featured in Table 3, “General Aviation and Reliever Airports in the SCAG Region”. Due to editorial considerations, including technical report and plan page length, the decision was made to feature the seven airports in the region with scheduled commercial passenger service in the narrative, and the general aviation and reliever airports in the region in a table. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO regional transportation plan (RTP) in California is airport ground access projects and improvements.
0001438.07.1.1	3. San Bernardino International Airport (SBD). SBD has a new passenger terminal with Federal Inspection Service (FIS) facilities. SBD has commercial aircraft Maintenance, Repair and Overhaul (MRO) facilities. FedEx and UPS have cargo flights from SBD to 9 US cities. Reference: https://en.wikipedia.org/wiki/San_Bernardino_International_Airport	Comment noted. San Bernardino International Airport (SBD) is featured in Table 3, “General Aviation and Reliever Airports in the SCAG Region.” Due to editorial considerations, including technical report and plan page length, the decision was made to feature the seven airports in the region with scheduled commercial passenger service in the narrative, and the general aviation and reliever airports in the region in a table. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO regional transportation plan (RTP) in California is airport ground access projects and improvements.

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0001438.07.1.2	<p>4. Southern California Logistics Airport (VCV). SCLA is a major aircraft storage, maintenance, overhaul and testing facility. Boeing Capital Corporation, a subsidiary of The Boeing Company, stores aircraft here for future leases and sales. GE Aircraft Engines does flight testing of engines here including the new GE9X engine powering the new Boeing 777X. Airtanker 910, which has a McDonnell Douglas DC-10, uses VCV for fighting forest fires in California. Reference: https://en.wikipedia.org/wiki/Southern_California_Logistics_Airport</p>	<p>Comment noted. Southern California Logistics Airport (VCV) is featured in Table 3, "General Aviation and Reliever Airports in the SCAG Region." Due to editorial considerations, including technical report and plan page length, the decision was made to feature the seven airports in the region with scheduled commercial passenger service in the narrative, and the general aviation and reliever airports in the region in a table. As discussed in the "Regulatory Framework" section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO regional transportation plan (RTP) in California is airport ground access projects and improvements.</p>
0001438.07.2	<p>Main document comments and questions.1. RTP Page 1.03: "The region is home to the two largest container ports in the Western Hemisphere (Los Angeles and Long Beach), and the world's fifth busiest airport system (Los Angeles World Airports)." The statement above needs to be updated. According to Airport Council International, Los Angeles International Airport (LAX) is the world's fourth busiest airport as of 2018. Los Angeles World Airports operates LAX. LAX is on track to becoming the world's third busiest airport according to first half 2019 figures.</p> <p>Reference:https://en.wikipedia.org/wiki/List_of_busiest_airports_by_passenger_traffic</p>	<p>Comment noted. The sentence "world's fifth busiest airport system" will be changed to "world's fourth busiest airport system".</p>
0001438.07.3	<p>2. RTP Appendix 3.13. This document leaves out the noise contours for airports classified as "Reliever Airports." Palmdale (PMD), March Inland (RIV), San Bernardino International (SBD) and Southern California Logistics Airport (VCV) all have jet air traffic that impacts airport neighbors with noise, pollution and vibration issues. Are these reliever airports included in the air quality, greenhouse gas emission, noise and other analyses? If not, then the RTP could be inadequate in disclosing and analyzing these important issues.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001438.08.1	<p>Aviation and Airport Ground Access Technical Report comments and questions1. Overall, SCAG must recommit to an active policy of “regionalization”, a policy that SCAG embraced for the past five decades. Why does SCAG no longer mention regionalization in the RTP? How can we get SCAG to implement regionalization?</p>	<p>Comment noted. Beyond the updated list of airport ground access projects, Connect SoCal aviation element is not bound by the content of past regional transportation plans (RTP). Air navigation and airspace regulation fall under the authority of the Federal Aviation Administration (FAA). Furthermore, as discussed in the subsection “MPOs have no authority over airport development”, although an MPO can play a collaborative and consultative role with the airports and the FAA, MPOs ultimately have no planning or regulatory authority over the airports or airspace planning. Airports are not required to incorporate MPO planning recommendations into their capital plans, and FAA funding decisions are not tied to MPO RTP recommendations. Rather, airport master plans, the airport improvement program, air safety, and air navigation are handled by the FAA. However, following the Airline Deregulation Act of 1978, the U.S. government (FAA) no longer has control over airline routes. Thus, the FAA has limited authority or influence over airline airport choice (please see The Airline Deregulation Act of 1978 and ACRP Report 98: Understanding Airline and Passenger Choice in Multi-Airport Regions for more information). As an MPO, SCAG is primarily a surface transportation planning agency, and is not a regulatory or implementing agency. Thus, Connect SoCal is focused on the airports from the perspective of airport ground access planning. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO RTP in California is airport ground access projects and improvements.</p>
0001438.08.2	<p>2. Executive Summary, page 2. “Only a small percentage of air passengers used transit to travel to and from the region’s airports.” SCAG must work with airports in the region to identify and prioritize projects that will encourage passengers to use public and mass transit to airports. Hollywood-Burbank Airport (BUR) is a good local model of being an intermodal and multimodal facility. LAX is working on the Landside Access Modernization Program (LAMP) to improve mass transit connectivity. Plans to extend the Metro Gold Line and Metrolink to and from Ontario International (ONT) need to be prioritized.</p>	<p>Comment noted. Airport ground access improvement projects identified in the Connect SoCal for each of the regional airports are based on the most current information available to SCAG and were developed through consultation and collaboration with the concerned airport authorities and the County Transportation Commissions. In addition to the airports, SCAG regularly works with Metro, Metrolink, the Orange County Transportation Authority, and the San Bernardino County Transportation Authority, and other transportation commissions and agencies, on transit and rail connections to the airports. In addition to the airport transit and rail projects highlighted in the Aviation and Airport Ground Access Technical Report, you can also find a subsection on “Airport Ground Access” in the Passenger Rail Technical Report. This section contains additional information on the Measure M funded Los Angeles World Airports (LAWA) Automated People Mover (APM) project, the possible Metrolink San Bernardino Line and Metro Gold Line extensions to Ontario International Airport (ONT), and the Hollywood Burbank Airport North Antelope Valley Line Metrolink Station. Specifically regarding ONT, the San Bernardino County Transportation Agency (SBCTA) completed an ONT ground access study in 2015. The San Bernardino and Riverside Metrolink Lines, as well as the Amtrak Sunset Limited Lines, operate in close proximity to ONT. Once extended to Montclair, the Metro Gold Line offers another potential transit option to ONT.</p>

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0001438.08.3	3. Executive Summary, page 2. “The majority of air passengers in the region are traveling to and from Los Angeles International Airport.” Again, SCAG needs an active regionalization program to help redirect passengers who are leaking from other SCAG airports. This will help to reduce pressure on LAX to expand in the future and to reduce	Comment noted. Historically, SCAG has been supportive of regionalization of aviation demand. However, as a planning agency with no regulatory or operational authority over the region’s airports SCAG’s ability to effectuate regionalization is rather limited. Furthermore, FAA has no authority over airline airport choice, and air passengers ultimately make their airport choice decisions based on market factors (e.g. price, number of flights). Air navigation and airspace regulation fall under the jurisdiction of the Federal Aviation Administration (FAA). However, following the Airline Deregulation Act of 1978, the FAA has no authority over airline routes (i.e. airport choice). Therefore, the FAA has limited authority or influence over airline airport choice, and ultimately, airlines and passengers choose airports based on economic factors (please see The Airline Deregulation Act of 1978 and ACRP Report 98: Understanding Airline and Passenger Choice in Multi-Airport Regions for more information). However, as noted in the Aviation and Airport Ground Access, and Passenger Rail Technical Reports, SCAG is working with the airports, and transportation commissions and agencies, to connect passengers to the different airports in the region. Improved transit and rail access to the airports should both reduce congestion on the surface transportation system, and increase airport options for air passengers.
0001438.08.4.2	4. Executive Summary, page 2. “The growth in air passenger demand globally can be explained in part due to the health of the economy and an ongoing trend of decreasing airfare.” The statement is correct, but leaves out important components of growing international air service: Open Skies Agreements between the United States and other countries which removed restrictions on city pairs and aircraft types and the use of new fuel efficient long range aircraft such as the Airbus A350XWB and the Boeing 787 Dreamliner that have made flying between smaller size markets profitable.	Comment noted. While the suggested text regarding Open Skies Agreements and new technology is helpful, ultimately, due to editorial considerations, most notably technical report and plan page length, not every fact or point of discussion was highlighted in the Aviation and Airport Ground Access Technical Report or other Technical Reports. Hence, the sentence in the executive summary is worded “the growth in air passenger demand globally can be explained in part”, in order to make it clear that the health of the economy and trends in airfare are not the sole reasons for the recent growth in air passenger activity. Rather than highlight a multitude of factors, the decision was made to focus on two key factors, which are also emphasized by the Federal Aviation Administration, in order to keep the executive summary, technical report, and plan narrative within a practical page length.
0001438.09.1	5. Exhibit 1, SCAG Region Airports, Page 4. Why is Palmdale Regional Airport listed as “Palmdale Air Terminal” on the map?	Comment noted. Exhibit 1 will be changed to read “Palmdale Regional Airport”.
0001438.09.2	6. Table 1, Commercial Air Carriers (and Destinations) Operating in the SCAG Region Airports, Pages 10 and 13 a. The list appears to be LAX-centric. Why was the list not broken out by individual SCAG airports with airlines and destinations? b. The destinations are missing for Aer Lingus (Dublin), Aeroflot (Moscow), Aeromexico (Mexico City, etc.), Aeromexico Connect, Air Canada (Vancouver, Calgary, Edmonton, Toronto, Montreal), Air Canada Rouge and Air China (Beijing). Where did the information about “O&M Existing Service” and “ Bridges, pavement” come from? c. Why were these airlines not listed? Air Italy (Milan)? Boutique Air (Merced)? Finnair (Helsinki)? d. Why are Air Canada and Volaris listed twice? e. Norwegian Air Shuttle has reduced its destinations from LAX f. Scandinavian Airlines just switched its destination from Stockholm to Copenhagen g. Thomas Cook Airlines, WOW Air and XL Airways France have ceased operations.	Comment noted. As a regional transportation plan for the entire SCAG region, and for the sake of avoiding redundancy (i.e. some airports share passenger destinations), table 1 focuses on airlines and destinations served by the region in total, versus highlighting them by individual airport. Moreover, given the constantly changing nature of airlines and passenger destinations in the market, the tables are meant to be an illustrative sample and not exhaustive, as they could go out of date in the regional transportation drafting and review process alone. However, Thomas Cook Airlines, WOW Air, and XL Airways France will be removed from the table. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO RTP in California is airport ground access projects and improvements.

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0001438.09.3	7. Table 2, SCAG Region Cargo Airlines and Destinations, Pages 14 and 15 a. The list appears to be LAX-centric. Why was the list not broken out by individual SCAG airports with airlines and destinations? b. Does this list account for Amazon’s Prime Air operation at March Inland Port (RIV)?	Comment noted. As a regional transportation plan for the entire SCAG region, and for the sake of avoiding redundancy (i.e. some airports share cargo destinations), the table focuses on airlines and destinations served by the region in total. Moreover, given the constantly changing nature of airlines and cargo destinations in the market, the tables are meant to be an illustrative sample and not exhaustive. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO RTP in California is airport ground access projects and improvements.
0001438.09.4	8. MPO’s have no authority over Airport Development, Pages 18 and 19. Please refer to our comments above concerning active regionalization.	Comment noted. Beyond the updated list of airport ground access projects, the Connect SoCal aviation element is not bound by the content of past regional transportation plans (RTP). Air navigation and airspace regulation fall under the authority of the Federal Aviation Administration (FAA). Furthermore, as discussed in the subsection “MPOs have no authority over airport development,” although an MPO can play a collaborative and consultative role with the airports and the FAA, MPOs ultimately have no planning or regulatory authority over the airports or airspace planning. Airports are not required to incorporate MPO planning recommendations into their capital plans, and FAA funding decisions are not tied to MPO RTP recommendations. Please see the Government Accountability Office (GAO) report, GAO-10-120, and FAA Advisory Circular 150/5070-6B, for more information. Rather, airport master plans, the airport improvement program, air safety, and air navigation are handled by the FAA. However, following the Airline Deregulation Act of 1978, the U.S. government (FAA) no longer has control over airline routes. Thus, the FAA has limited authority or influence over airline airport choice (please see The Airline Deregulation Act of 1978 and ACRP Report 98: Understanding Airline and Passenger Choice in Multi-Airport Regions for more information). As an MPO, SCAG is primarily a surface transportation planning agency, and is not a regulatory or implementing agency. Thus, Connect SoCal is focused on the airports from the perspective of airport ground access planning. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO RTP in California is airport ground access projects and improvements.
0001438.09.5	9. Where are air passengers coming from and how are they getting to the airport?, Pages 24 to 26. Again, SCAG has an opportunity and a responsibility to work with airports in facilitating projects to create and enhance mass transit projects to airports to encourage more air passengers to use transit options other than single occupancy vehicles or Transportation Networking providers.	Comment noted. SCAG is regularly communicating and working with the airports on their ground access improvements. Moreover, as an MPO, SCAG works closely with the transit and passenger rail agencies in the region. Please see the Passenger and Transit Technical Reports for more information on the Burbank Airport Metrolink stations, the LAX Metro Crenshaw Line stop, and the proposed Metrolink and Metro extensions to Ontario International Airport.
0001438.09.6	10. Air Cargo traffic to the SCAG region airports, Page 26. Why did SCAG only include the top 5 cargo airports in the SCAG modeling program for truck trips? Other airports such as San Bernardino (FedEx and UPS) and March Inland Port (Amazon Prime Air) produce truck trips. It is anticipated that these 2 airports will likely see increases in cargo service from these cargo carriers and this will impact roadways with more truck traffic.	Comment noted. The decision to highlight the “top 5” in the table is only for illustrative purposes. San Bernardino (SBD) and March (RIV) are included in the overall regional model. Please see “analytical approach” section in the Transportation Conformity Analysis Technical Report for more information about the modeling methodology.

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0001438.10.1	11. Strategies, Page 31. Again, SCAG must be more pro-active in working with SCAG region airports on ground access to make these airports more intermodal and multimodal.	Comment noted. While SCAG acknowledges more work needs to be done in the future plan updates, the ground access improvement projects identified in the Connect SoCal for each of the regional airports represent the most current information available to SCAG and were developed in consultation and collaboration with the airport authorities and the County Transportation Commissions concerned.
0001438.10.2	12. Table 12, SCAG Region Airport Forecast for 2020-2045 RTP/SCS, Page 33. What documentation and justification has LAWA provided for the projected 127 Million Annual Passengers in the 2045 horizon year?	Comment noted. As noted in the Aviation and Airport Ground Access Technical Report “air passenger demand forecast” subsection, the airports provided their forecast numbers for 2045. The airport level forecasts were based on planning and analysis conducted on the airport level by airport staff and/or consultants. SCAG staff met and corresponded with airport officials regarding their activity data and forecast methodology throughout the RTP research, analysis, and drafting process. Furthermore, as discussed in the subsection “MPOs have no authority over airport development”, although SCAG maintains a collaborative and consultative relationship with the airports, MPOs do not maintain regulatory authority over airports.
0001438.10.3	13. General Aviation Forecast, Page 34. Does the forecast include the possible closure of Santa Monica Airport (SMO)? Does the forecast include membership flying services such as SurfAir and FLOAT?	Comment noted. The General Aviation Forecast is derived from the 2018 Federal Aviation Administration (FAA) Terminal Area Forecast (TAF). The FAA TAF has general aviation operations forecasts for all of the general aviation, commercial service, and reliever airports in the SCAG region, including Santa Monica Airport (SMO), up to 2045. As to general methodological queries, including what is included in the 2018 FAA TAF, please refer to the FAA TAF Summary for FY 2018 – 2045.
0001438.10.4	14. New Airport Ground Access and Modernization Projects, Pages 34 to 36. ARSAC appreciates that the 2028 Olympic Games are mentioned, but again, it appears that there is lack of urgency in this RTP to have airport access projects completed before the Olympic games making the airports in the SCAG region, “Olympics ready.” ARSAC supports efforts to bring Metrolink and Metrorail to Ontario International Airport (ONT).	Comment noted. Airport ground access improvement projects identified in the Final Connect SoCal for each of the regional airports are based on the most current information available to SCAG and was developed through consultation and collaboration with the concerned airport authorities and the County Transportation Commissions.
0001438.10.5	15. Supersonic aircraft missing from RTP. Supersonic passenger aircraft are expected to debut during the 2020-2045 timeframe of the RTP. These include the Boom Technology. Overture and Aerion AS2 supersonic business jet. Boom has 10 options each from Japan. Airlines and Virgin Atlantic, both of whom serve LAX. Reference 1: https://en.wikipedia.org/wiki/Boom_Technology Reference 2: https://en.wikipedia.org/wiki/Aerion	Comment noted. As a metropolitan planning organization, and primarily a surface transportation planning agency, Connect SoCal is focused on the airports from the perspective of airport ground access. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO regional transportation plan in California is airport ground access projects and improvements. Moreover, as discussed in the subsection “MPOs have no authority over airport development”, although the MPO can play a collaborative and consultative role with the airports and the Federal Aviation Administration (FAA), MPOs ultimately have no planning or operational authority over aviation systems planning. Matters of new aircraft certification and air navigation regulation are handled by the FAA. Thus, the discussion of new aircraft technology is limited in the Aviation and Airport Ground Access Technical Report and Final Connect SoCal.

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0001438.10.6	16. Drones also missing from RTP. Drones are being deployed for law enforcement and commercial purposes such as filming and package delivery.	Comment noted. As a metropolitan planning organization, and primarily a surface transportation planning agency, Connect SoCal is focused on the airports from the perspective of airport ground access. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO regional transportation plan in California is airport ground access projects and improvements. Moreover, as discussed in the subsection “MPOs have no authority over airport development”, although the MPO can play a collaborative and consultative role with the airports and the Federal Aviation Administration (FAA), MPOs ultimately have no planning or operational authority over airspace planning. Matters of new technology and air safety are handled by the FAA. Thus, beyond a brief discussion of new technologies, the Connect SoCal Aviation and Airport Ground Access Technical Report does not focus on new vertical take-off and landing (VTOL) technology in great detail as that goes beyond the scope of airport ground access. However, the Emerging Technology Technical Report does discuss VTOL technology as a medium to long term mobility technology option.
0001438.10.7	17. Helicopters also missing from RTP. Helicopters are used law enforcement, fire fighting, medical, news coverage and private transportation. Helicopters negatively affect residents when they fly low.	Comment noted. As a metropolitan planning organization, and primarily a surface transportation planning agency, Connect SoCal is focused on the airports from the perspective of airport ground access, and not aircraft, including helicopters. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO regional transportation plan in California is airport ground access projects and improvements. Moreover, as discussed in the subsection “MPOs have no authority over airport development”, although the MPO can play a collaborative and consultative role with the airports and the Federal Aviation Administration (FAA), MPOs ultimately have no planning or regulatory authority over airspace planning and regulation. Matters of noise and air safety, including helicopters, are handled by the FAA.
0001438.10.8	18. VTOL. New services such as Uber Elevate are on the horizon. This service will require new landing pads to enable its usage. The safety of manned and unnamed VTOL needs to be examined. From Wikipedia: “UberAIR / UberElevate will provide short flights using VTOL aircraft. Demonstration flights are projected to start in 2020 in Dallas and Los Angeles. Commercial operations are projected to begin in 2023. Although technically feasible, the program is expected to encounter safety and regulatory obstacles.” Reference: https://en.wikipedia.org/wiki/Uber#Riding_with_Uber	Comment noted. Matters of air space and air safety, including drones and VTOL, fall under the jurisdiction of the Federal Aviation Administration (FAA). As a metropolitan planning organization, and primarily a surface transportation planning agency, Connect SoCal is focused on the airports from the perspective of airport ground access. As discussed in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the only required aviation-related feature of an MPO regional transportation plan in California is airport ground access projects and improvements. Moreover, as discussed in the subsection “MPOs have no authority over airport development,” although the MPO can play a collaborative and consultative role with the airports and the FAA, MPOs ultimately have no planning or regulatory authority over airspace planning.
0001438.11.1	Passenger Rail Technical Report comments and questions1. Table 1, Private Transportation Providers, Page 18. Destinations are missing for Tres Estrellas de Oro and TUFESA.	Table 1 of the Passenger Rail Technical Report will be updated per the comment, if the information is available.

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0001438.11.2	2. Los Angeles to Las Vegas, Page 27. Was XpressWest and its successor Virgin Trains USA approved for a Palmdale to Victorville segment? Why is this not mentioned about a Virgin Trains station in Palmdale?	Connect SoCal includes the XpressWest service from Victorville to Las Vegas in its financially-constrained plan. Currently, there are very preliminary planning discussions of extending XpressWest from Victorville to Palmdale, however this high-speed rail segment is currently unfunded and additional analysis would be needed before consideration for inclusion in a future update to the Connect SoCal.
0001438.11.3	3. Airport Ground Access, Page 33. Were the City of Palmdale’s plans for a new airport terminal on the northwest corner of Air Force Plant 42 (southeast corner of Sierra Highway and Avenue M) considered in this RTP?	SCAG is aware of the plans for the airport terminal, however at this time there is no proposed rail connection to the Palmdale Regional Airport in Connect SoCal. The Palmdale Regional Airport is included in the Exhibit 1 “SCAG Region Airports” map and Table 3 “General Aviation and Reliever Airports in the SCAG Region” in the Aviation and Airport Ground Access Technical Report.
0001438.11.4	ARSAC will continue to work with SCAG to improve our regional economic and environmental conditions. We encourage SCAG to increase its outreach and to foster discussion and action within each of the Counties and Cities of our region.	Comment noted. SCAG will continue its outreach activities, and work to strengthen engagement, with local jurisdictions in future plan updates. Also see the Final Public Participation and Consultation Technical Report for further discussion of SCAG’s outreach activities related to development of Connect SoCal.
<i>Submitted by</i>	Bolsa Chica Land Trust	Submittal 0001441 Related Documents Link
0001441.01	Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. The Bolsa Chica Land Trust is now a part of this growing coalition in 2020. The Bolsa Chica Land Trust is a 5,000 member non-profit organization established in 1992. Our mission is the acquisition, preservation and restoration of all of Bolsa Chica and the education of the public to its natural wonders and cultural significance. The Bolsa Chica Ecological Reserve, located on our Orange County coastline, is owned and managed by the State. Bolsa Chica is an international birding location visited by approximately 80,000 visitors each year. Over the course of our 27 year history, BCLT has been the catalyst for the protection of hundreds of acres of coastal wetlands and 118 acres of coastal uplands at Bolsa Chica from development.	Thank you for your comments. Comments noted.

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<i>Submitted by</i>	Bolsa Chica Land Trust	Submittal 0001441 Related Documents Link
0001441.02	<p>We offer the following comments on the Natural and Farmland policy, goals, and next steps. We are pleased to see conservation of our natural lands as one of the 10 main policies of Connect SoCal. Land preservation not only reduces greenhouse gas (GHG) emissions, but also sequesters carbon. Any investment in habitat restoration improves this sequestration potential as well. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. We thank you for your leadership. BCLT agrees that future development should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what conservation mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved by focusing development elsewhere, doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus our work on protecting important habitat lands. A lot of time, energy, money, strategy, and political will are combined to create a successful conservation transaction that lead to permanently conserved lands. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.</p>	<p>Thank you for your comment. SCAG appreciates and commends the contributions to conservation made by non-profit entities. SCAG will continue to work with this important stakeholder group in order to implement conservation strategies listed in the Final Connect SoCal. Suggested mechanisms for conservation are listed in Chapter 3 of the Final Connect SoCal as well as in the Natural & Farmlands Conservation Technical Report. Additionally, Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and support long-term management and stewardship of mitigated properties.</p>

ID	Comment	Response
<i>Submitted by</i>	Bolsa Chica Land Trust	Submittal 0001441 Related Documents Link
0001441.03	<p>Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, protection of cultural and archeological sites, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water and natural resources. The Plan outlines that the region anticipates an additional 3.8 million people by 2045 providing increased pressure to our existing parkland. Existing studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (five acres per 1000 residents). As cities grow, more parks and more park access will be needed. What is the mechanism for this? Additionally, and more importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity activities, like turfed soccer and baseball fields. The types of land acquired as mitigation or through local conservation efforts typically focus on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing “more” access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. How additional access will be provided should be addressed, as well as how additional lands will actually be acquired and preserved.</p>	<p>The Final Connect SoCal seeks to improve mobility, accessibility, reliability, and travel safety for the region's population, and promotes conservation of natural lands and restoration of habitats in urban, suburban and rural settings. More information about local park access can be found in the Environmental Justice Technical Report.</p>
0001441.04	<p>Wildlife corridors are critical components to Southern California conservation efforts. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors prior to commencing impactful projects. Many non-profits like BCLT are working to ensure additional bays, estuaries, wetlands, bluffs, and beaches are preserved forever. Additionally, one way our coasts are connected to inland areas are through our rivers and streams. These riparian areas serve as recreational trail corridors, water recharge and infiltration locations, and serve as places our wildlife use for watering sources. However, transportation and land use generated urban runoff are still problems. Our beaches and coastline are inundated with pollution. Litter, debris, and pollutants should be decreased prior to reaching the coast. Ensuring everyone has a positive experience on the sand and in the surf should be our goal, but we need to address Southern California's trash problem.</p>	<p>SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Furthermore, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, as follows: "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation." Moreover, Connect SoCal endorses Urban Greening as a multi-benefit land use strategy that improves the relationship between the built and natural environment. For responses related to urban runoff, please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal Program Environmental Impact Report.</p>

ID	Comment	Response
<i>Submitted by</i>	Bolsa Chica Land Trust	Submittal 0001441 Related Documents Link
0001441.05	<p>One key way to improve the environment is through restoration projects. These can be on land, in riparian areas, and even in the ocean. Restoration provides benefits by adding native plants, removing the non-native plants and their seedbank, as well as increasing carbon storage, and providing improved habitats for our wildlife. Our environment benefits from these improvements, as do our watersheds, our air, and our communities. Having improved habitats means that our water is cleaner, our soils won't erode as easily, it creates jobs for local residents, and our unique biodiversity is maintained. Further, the many endemic and threatened/endangered plants and animals benefit from these restoration projects as well. Thank you for including restoration as a key component in the natural lands and agricultural policy. We feel it is important to note that although restoration dollars are available through State measures, there is overwhelming competition for those dollars, particularly for Southern California where restoration projects are typically more expensive to implement. SCAG support of restoration will be an important element to achieving restored and functioning habitats. Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to me.</p>	<p>Thank you for your comment. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of conservation strategies, and we will send notifications about upcoming opportunities to the provided email address.</p>
<i>Submitted by</i>	Bureau of Engineering, City of Los Angeles	Submittal 0001298 Related Documents
0001298.01	<p>The opening year for Project ID LAF7207, Anaheim Street Widening, should be updated to 2023.</p>	<p>Comment noted. The requested completion year modification has been made to LAF7207.</p>

ID	Comment	Response
<i>Submitted by</i>	California Air Resources Board	Submittal 0001531 Related Documents Link
0001531.01	<p>California Air Resources Board (CARB) staff appreciate the opportunity to review and engage with the Southern California Association of Governments (SCAG) staff on the draft update to its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as "Connect SoCal." This work is more important than ever as CARB's first SB 150 progress report showed that California is not on track to meet the greenhouse gas (GHG) reductions expected under Senate Bill (SB) 375 for 2020 and that vehicle miles traveled (VMT) is increasing. To achieve the State's climate mandates, California needs significant and immediate changes to how we plan, fund, and build our communities and transportation systems. Recognizing this, Governor Newsom signed Executive Order N-19-19 this past September to redouble the State's efforts to reduce GHG emissions, with an explicit focus on lowering VMT. The SCS plays a critical role in supporting the State's climate efforts, as well as local objectives to create an economically vibrant region that responds to the needs of its diverse communities and provides better access to jobs and cleaner air for its residents. We appreciate SCAG's work as we endeavor together to achieve these shared goals. In meetings held in December 2019 and January 2020, CARB staff voiced concern that SCAG's 2020 draft RTP/SCS is missing information CARB needs to conduct its GHG evaluation under SB 375. For all third round RTP/SCSs, like Connect SoCal, CARB will focus on assessing whether plan GHG reductions are reasonably supported with regional implementation actions and investments. After discussing these expectations, CARB and SCAG staff agreed on additional information and clarifications that SCAG staff will make in the final 2020 RTP/SCS based on CARB's updated Sustainable Community Strategy Program and Evaluation Guidelines.</p>	Thank you for your comments. Comments noted.
0001531.02	<p>CARB staff appreciate SCAG staff's cooperation and commitment to incorporate these items, which include:</p> <ul style="list-style-type: none"> • Adding performance reporting for the year 2035 to demonstrate how SCAG's plan meets the 2035 GHG emissions reduction target (e.g., through changes in VMT, mode split, and trip length). 	Thank you for taking the time to review and comment on the draft Connect SoCal. SCAG is very appreciative of the cooperative, constructive relationship we enjoy with ARB. In response to comments received from ARB staff, SCAG will add per capita GHG emissions reduction performance reporting data for the year 2035 in the Final Performance Measures Technical Report.
0001531.03	<p>Clarifying what strategies are being quantified for credit toward achievement of SCAG's SB 375 2035 target, and making sure these correspond to the strategies listed in SCAG's Technical Methodology submittal to CARB. Currently, the strategies listed in the draft RTP/SCS and the Technical Methodology are different and use inconsistent terminology.</p>	Comment noted. The referenced text has been edited in the GHG Reduction Approach section of the Sustainable Communities Strategy Technical Report.
0001531.04	<p>Clarifying the description of SCAG's Preferred Scenario/Final Growth Vision as referenced in the SCS Technical Report and Chapters 3 and 4 of the Draft Plan, so CARB staff can identify what principles SCAG has applied to develop the final adopted development pattern, and to what extent SCAG's preferred scenario is a change from current trends.</p>	Comment noted. The referenced text has been edited to further describe the Final Growth Vision in the Sustainable Communities Strategy Technical Report and Chapter 3 of Connect SoCal.
0001531.05	<p>Adding information identifying the commitments, investments, and actions SCAG and its local members are making to demonstrate why the land use growth constraint assumptions in the plan are likely to be implemented, and therefore reasonable for inclusion.</p>	Comment noted. The referenced text has been edited in the Sustainable Communities Strategy Technical Report to further clarify these assumptions.
0001531.06	<p>Adding long-term induced demand analysis information and associated estimates of VMT and GHG into the final plan's GHG emissions and VMT.</p>	Comment noted. The referenced information has been added to the Sustainable Communities Strategy Technical Report.

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<i>Submitted by</i>	California Air Resources Board	Submittal 0001531 Related Documents Link
0001531.07	Clarifying how the current 6 th cycle and previous 5th cycle regional housingneeds allocation (RHNA) are or are not reflected in the plan, so CARB can verifythat the plan development pattern and strategies reflect best availableinformation, and are therefore reasonable.	The 5th Cycle RHNA determined the region’s housing need from January 2014 through October 2021 to be 412,137 units (53,179 housing units per year). The portion of Connect SoCal’s forecast covering the years 2016-2030 projects 891,000 additional households (64,000 new households per year) which would be more than sufficient to address the 5th Cycle RHNA.Also see Master Response #1 regarding RHNA.
0001531.08	In addition, as we discussed, we request that SCAG staff provide the followinginformation that is equally critical to our evaluation:• Adding reporting of observed data as it relates to achievement of the latest2020 targets, and if needed, discussing what adjustments and changes SCAGhas prioritized in the SCS to get the region on track to achieve its 2020 targetas soon as is reasonably practicable. Given that 2020 is a milestone year forSB 375, CARB staff expect that MPOs will continue to monitor and reportcurrent observed data as it relates to the 2020 targets within their SCSs.	Comment noted. Direct observed data on vehicle miles traveled or greenhouse gas emissions data is not yet available. SCAG has added clarification text to discussions about the 2020 target.
0001531.09	Adding data on the status of implementing all strategies and actions that wereincluded in its previous 2016 RTP/SCS such that CARB staff can discernprogress the region has made towards meeting its GHG emissions reductiontargets through its implementation efforts. SCAG should also includediscussion of how this information has influenced change in the set of strategiesand actions included in the 2020 RTP/SCS. CARB's evaluation will includereporting on the region's implementation status.	Comment noted. The status on 2016 RTP/SCS implementation is provided throughout various Connect SoCal Technical Reports and within Chapter 3. SCAG staff are committed to providing the requested information and submitting a summary with the Final Connect SoCal Technical Methodology.
0001531.10	Clarifying for each strategy what SCAG staff is assuming regarding theapplicable geographic scope, with specific locations if known; theimplementation timeframes; and what measureable actions and investmentsSCAG and its member agencies will make to support and track strategyimplementation. CARB will use this information to assess whether thestrategies are likely to be implemented as assumed, and are thereforereasonable for inclusion and credit.	Comment noted. Updates have been made to the Sustainable Communities Strategy Technical Report to clarify the strategies included in Connect SoCal.
0001531.11	Adding this information is especiallyimportant for the following highlighted draft strategies:- Pricing strategies (i.e., mileage-based user fees, TNC user fees, andcongestion pricing). SCAG may be able to attribute emissions reductionsfrom these strategies toward SB 375 target credit provided what the region implements is above and beyond State actions. To do so, SCAG needs toprovide the above requested information (i.e., geographic scope,implementation timeframes and measureable actions and investments) andshould clarify how SCAG has made reasonable adjustments to previouspricing assumptions from the last plan. For example, providing evidence ofregional actions to support pricing implementation.(See pages 28- 29 of CARB's Updated Final Staff Report Proposed Update to the SB 375 GreenhouseGas Emission Reduction Targets at: https://ww3.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf?ga=2.25614781.1272438952.1572376271-1067821673.1540248233 and Final Sustainable Communities StrategyProgram and Evaluation Guidelines at https://ww2.arb.ca.gov/resources/ documents/scs-eva_luationresources ,for discussion of Local/Regional Pricing Policy.)	Comment noted. Additional detail has been added to the Sustainable Communities Strategy Technical Report.

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<p><i>Submitted by</i> California Air Resources Board Submittal 0001531 Related Documents Link</p>		
0001531.12	<p>Multimodal dedicated lane strategy. SCAG needs to provide the aboverequested information (i.e., geographic scope, implementation timeframes and measurable actions and investments) and should clarify why it is reasonable to assume emissions reductions from conceptual-phase complete streets projects for the 2020 RTP/SCS that are not reflected in the fiscally constrained RTP project list.</p>	<p>While the multimodal dedicated lanes are in the conceptual phase, the potential cost of the strategy is accounted for in the Project List as a regional initiative for expanded bus service (project 7120007). SCAG staff are committed to providing the requested information and submitting a summary with the Final Connect SoCal Technical Methodology.</p>
0001531.13	<p>Adding regionally specific data to support SCAG's adjustment of baseline triple level VMT and GHG emissions for Telemedicine and E-Commerce trip reductions for medical and retail trips for the 2020 RTP/SCS. CARB staff are concerned about SCAG's inclusion of Telemedicine and E-Commerce baseline VMT adjustments based on the data SCAG is using to develop its assumptions. SCAG is currently using information based on national and international data regarding health care claims and retail sales and has not provided clear evidence that trends in these data sets translate to reductions in GHG emissions, trips, or VMT in Southern California. We understand that SCAG is working to provide local data to CARB, as well as develop a more conservative approach. However, if SCAG cannot provide sufficient local supporting data, CARB staff recommend removing these assumptions from the 2020 RTP/SCS and reevaluating their inclusion in subsequent RTP/SCS updates once local data are available.</p>	<p>Local data and very conservative estimates have been developed for telemedicine and will be discussed with CARB. For E-Commerce, SCAG is further reviewing local information and has similarly made very conservative estimates for inclusion in the final plan and will be discussing with CARB. SCAG staff are committed to providing the requested information and submitting a summary with the Final Connect SoCal Technical Methodology.</p>
0001531.14	<p>CARB staff are committed to working with SCAG staff on potential approaches to address these requests and remedy aspects of SCAG's technical methodology for estimating GHG emissions. Without this information, it is difficult for staff to determine whether the draft RTP/SCS would meet the targets. It would be helpful to receive the identified information prior to adoption, so that we have an opportunity to discuss any further issues. We look forward to continuing our collaboration with SCAG.</p>	<p>Comment noted. SCAG staff have worked closely with CARB staff in refining the Connect SoCal Technical Methodology, discussing and addressing CARB staff's questions and concerns on the Draft Connect SoCal. SCAG staff are committed to providing the requested information and submitting the Final Connect SoCal Technical Methodology in a timely manner.</p>
<p><i>Submitted by</i> California Community Builders / The Two Hundred Submittal 0001443 Related Documents Link</p>		
0001443.01	<p>We write to follow up on the comments we made during the Scoping Plan, as a civil rights organization focused on promoting minority home ownership and opposing government "redlining" actions that result in residential segregation and disparate harms to California's minority communities. We are deeply distressed that the draft Connect SoCal RTP/SCS Plan is even more forcefully aimed at ending minority home ownership opportunities in California's most populous region, especially since the majority of the region's residents are minorities- and especially since homeownership has long been recognized as the most successful pathway to the middle class and the intergenerational wealth accumulation that helps fund income interruptions from injuries or job losses, college expenses for kids, and other unplanned expenses for all family members. Senate Bill 375 expressly requires SCAG to develop and periodically update these regional plans to meet the region's actual (not aspirational based on some "end capitalism" or "massively redistribute wealth" advocacy vision) housing and transportation needs. SB 375 also requires that these regional plans accommodate for continued economic growth (which we believe requires preserving upward mobility for California's hard working minorities, as well as young people), and actually advance California's climate leadership not simply induce Californians to leave to other states to find housing they can afford to buy, allowing California to falsely claim a GHG reduction credit for reducing its population and in-state economic activities.</p>	<p>The referenced comments include various claims without support by data and analysis. The Final Connect SoCal includes extensive Environmental Justice (EJ) analyses documented in the Environmental Justice Technical Report. It is important to note that the EJ Technical Report contains findings that the implementation of Connect SoCal does not disproportionately impact low-income and minority populations and, in many instances, would improve future conditions for such populations.</p>

ID	Comment	Response
<i>Submitted by</i>	California Community Builders / The Two Hundred	Submittal 0001443 Related Documents Link
0001443.02	<p>We are fully supportive of the SB 375 goals- but we oppose making minorities the collateral damage in California's war on climate change. We oppose the RTP/SCS as an unlawful agency action to promote de jure residential racial segregation while exacerbating the adverse environmental, commuter health, and family welfare harms caused by intentionally increasing roadway gridlock. We further conclude that the Program EIR for the RTP/SCS is false, as well as wholly unlawful, for failing to acknowledge that the catastrophic physical, social, and civil rights consequences of the SoCal Connect plan's high density infill rental housing, someone-else-should-ride-the-bus agenda, including further increases in homeless and poverty with attendant significant adverse health, safety , and environmental impacts. We support an "all of the above" strategy for solving the housing crisis, which brings a clear-eyed recognition of what the region's families can actually afford to buy (and rent), and which matches the region's overwhelming transportation mode automobile choice with transportation plan solutions that actually work for people - not agencies, not staff, and not the legion of consultants who profit from taxpayer-funded planning that has not, and does not, work in the real world. SCAG's prior SB 375 plans did not reduce VMT. VMT increases with population and employment. SCAG's prior SB 375 plans were implemented when both the homelessness and housing crisis got much worse, not better. Professor Einstein said the definition of "insanity" is doing the same thing over and over again while expecting a different outcome. The SoCal Connect Plan is indeed insane: it provides neither housing nor transportation solutions that match the needs of the region, especially the needs of the region's minorities and young people.</p>	<p>Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR. The Final Connect SoCal includes extensive Environmental Justice (EJ) analyses documented in the Environmental Justice Technical Report. It is important to note that the EJ Report contains findings that the implementation of Connect SoCal does not disproportionately impact low-income and minority populations and, in many instances, would improve future conditions for such populations. Also see the Sustainable Communities Strategy Technical Report regarding housing affordability.</p>
0001443.03	<p>We further support a rationale and transparent consideration of all regional greenhouse gas reduction strategies, not simply the fiction that Vehicle Mile Travelled (VMT) reductions for California families will actually meaningfully reduce global GHG. The fact is that SB 375's GHG reduction mandate was unlawfully converted into an unlawful VMT reduction mandate by the California Air Resources Board in an unlawful underground regulation "guidance" document that is no less than a bureaucratic putsch to end-run the Legislature's repeated refusal to mandate regressive (and ultimately racist) VMT reductions. By aiding and abetting CARBin this unlawful and racially discriminatory anti-housing and anti-transportation plan, SCAG joins CARB in violating the civil rights of the region's minority population while making zero -or negative- progress in reducing global GHG. In fact, SB 375 did not authorize any agency, including SCAG, to make homeownership unattainable, worsen the homelessness crisis, and increase housing costs and make transportation more costly and less efficient for hard working minorities and young people. In adopting SB 375 the Legislature considered, and expressly rejected, requiring the reduction in Vehicle Miles Travelled (VMT) as a climate legal imperative in California. Later legislation to require VMT reductions have likewise failed, which is not surprising given the inherently regressive consequences of increasing commute durations and costs for the very people priced out of more proximate housing, the overwhelming ongoing dependence of Californians on cars and falling transit utilization, and the far more equitable and effective climate change strategies and mandates that have been adopted by the Legislature.</p>	<p>Comment noted. SCAG's Connect SoCal is required to meet the regional Greenhouse Gas (GHG) emissions reduction target per SB 375, specifically a 19% per capita GHG reduction compared to the 2005 level. The per capita VMT reduction estimates of Connect SoCal is derived from meeting the regional GHG reduction target, and is also dependent on the mix of GHG reduction strategies. The Final Connect SoCal includes extensive Environmental Justice (EJ) analyses documented in the Environmental Justice Technical Report. It is important to note that the EJ Report contains findings that the implementation of Connect SoCal does not disproportionately impact low-income and minority populations and, in many instances, improves future conditions for such populations. Also see the Sustainable Communities Strategy Technical Report regarding housing affordability.</p>

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<i>Submitted by</i>	California Community Builders / The Two Hundred	Submittal 0001443 Related Documents Link
0001443.04	<p>While CARB and its allies routinely assert that transportation is the largest GHG emission sector left in California, they omit the fact that the cars needed by people to get to and from work and attend to medical appointments, family care, and other routine family needs, are both increasingly cleaner - with more electric car mandates underway - and account for only a fraction of the plane, train, shipping, and heavy duty truck transportation sector GHG. They also routinely omit the fact that California already has a very low per capita VMT relative to other states outside the historic East Coast, that passenger car smog emissions have dropped by more than 99% through the methodical and transparent regulatory implementation of the Clean Air Act, that VMT has of course actually substantially increased - with the highest increase by far coming from Latino workers and families. They also ignore the fact that coastal Southern California already has the highest population densities in the United States. We implore SCAG to resist the lure of redlining by elitist anti-car and anti-homeownership planners, and avoid violating civil rights, air quality, transportation, and housing laws to appease the takeover of land use decisionmaking by CARB to worsen California's homelessness, housing and poverty crises.</p>	<p>Comment noted that cars are increasingly cleaner. This fact has already been included in the EMFAC model used to estimate the GHG emissions for the Final Connect SoCal and additional strategies will be needed to meet the GHG reduction target. SCAG's Final Connect SoCal is required to meet the regional GHG reduction target per SB 375, specifically a 19% per capita GHG reduction compared to the 2005 level. The per capita VMT reduction estimate of the Final Connect SoCal is derived from meeting the regional GHG reduction, and is also dependent on the mix of GHG reduction strategies. The Final Connect SoCal include extensive Environmental Justice (EJ) analyses documented in the Environmental Justice Technical Report. It is important to note that the EJ Report contains findings that the implementation of Connect SoCal does not disproportionately impact low-income and minority populations and, in many instances, improves future conditions for such populations. Also see the Sustainable Communities Strategy Technical Report regarding housing affordability.</p>
0001443.05	<p>Residential re-segregation in Southern California is already well underway based on the housing crisis, which has caused a shortage of housing supply and skyrocketing housing costs in the region, and which has in turn resulted in relentless increase in the homeless population, and caused California to have the nation's highest poverty rate- and by far the highest poor population count based on US Census Bureau data. In even more accurate poverty data compiled by United Way of California, even when state public assistance is taken into account (e.g., assistance with rent, childcare, food and medical care), nearly 40% of Californians - disproportionately minorities, children, and seniors - cannot meet routine monthly living expenses. Struggling to Stay Afloat: The Real Cost Measure in California 2019, https://www.unitedwaysca.org/realcost. "Redlining" to exacerbate redlining remains endemic in California's government agencies through tools like the California Environmental Quality Act (CEQA): the most common target of CEQA lawsuits are housing, and within the SCAG region 14,000 housing units were challenged in just a three year study period. Virtually all (99%) of the challenged housing was in urbanized areas not greenfields, most (70%) was within one-half mile of the 2016 SB 375's priority transit areas, and most (78%) were in the region's whiter, wealthier and healthier communities rather than in the designated minority "environmental justice" neighborhoods suffering from higher poverty and unemployment rates, and lower educational and health outcomes, for residents. California Environmental Quality Act Lawsuits and California's Housing Crisis, Hastings Law School Environmental Law Journal, Fall 2018 https://repository.uchastings.edu/hastings_environmental_law_journal/vol24/iss113/</p>	<p>Comment noted. The Final Connect SoCal includes extensive Environmental Justice (EJ) analyses documented in the Environmental Justice Technical Report. It is important to note that the EJ Report contains findings that the implementation of Connect SoCal does not disproportionately impact low-income and minority populations and, in many instances, would improve future conditions for such populations. Specifically, the topic on neighborhood change and displacement is one of the 18 performance indicators analyzed in the EJ Technical Report which indicates no disproportionate impact on vulnerable communities based on SCAG's EJ analysis. SCAG's EJ analysis concludes that the neighborhood change and displacement indicator does not disproportionately impact low-income and minority populations at the regional scale but would require special attention on a project-by-project basis. In such cases, neighborhoods that may potentially experience neighborhood change or displacement may utilize recommended practices and approaches relating to housing in the Toolbox Section of the EJ Technical Report. Please refer to the EJ Technical Report for specific methodologies and conclusions on neighborhood change and displacement. Also see the Sustainable Communities Strategy Technical Report regarding housing affordability.</p>

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<i>Submitted by</i>	California Community Builders / The Two Hundred	Submittal 0001443 Related Documents Link
0001443.06	<p>The 200 has filed three civil rights lawsuits against state agencies that have weaponized CEQA as an anti-housing, anti-transportation redlining litigation cudgel to be deployed against housing that hard working minority families can afford to buy. The first lawsuit targeted CARB's four measures in the CARB scoping plan, including the unlawful VMT reduction mandate rejected by the Legislature; in unsuccessfully attempting to dismiss that lawsuit, CARB's attorneys argued that it was lawful for CARB to engage in racially discriminatory housing practices because housing was not a protected class. The second lawsuit sought disclosure under the Public Records Act of documents deemed by CARB and its allied agencies such as the Office of Planning and Research (OPR) to be "too controversial" for public release; attorneys for the state have employed a variety of litigation tactics to delay that lawsuit by nearly two years. The most recent lawsuit challenged the anti-housing 2018 expansions of CEQA regulations, and is attached hereto as a separate comment to this letter because SCAG's draft SoCal Connect Plan -like its unlegislated and unlawful CARB and OPR predecessors- is a violation of the state and federal constitutional due process and equal protection provisions, violates state and federal fair housing act laws, and violates air quality and transportation and land use laws, by distorting approved housing and transportation plans that have already been approved by voters, elected officials, and environmental and transportation agencies, to intentionally increase traffic congestion and intentionally curtail or even eliminate market rate housing that is actually affordable for purchase by the majority-minority median income workers in the SCAG region. Each paragraph in the attached Complaint is a separate comment, and provides factual and legal evidence demonstrating that the draft SoCal Connect Plan is as unlawful as the discriminatory anti-housing regulatory expansion of CEQA.</p>	<p>Comment noted on the three lawsuits filed by The Two Hundred against state agencies.</p>
0001443.07	<p>The Program EIR for the plan is likewise unlawful under CEQA. The plan ignores the environmental consequences of its economically infeasible (to the vast majority of the region's residents, including especially minorities) high cost, high density infill-only housing plan, which will cause more homelessness, poverty, out-migration, and supercommutes. The San Francisco Bay Area, which has pursued this failed high density infill-only strategy for a decade, now draws workers from 21 counties - an explosion of "supercommuters" forced to live ever-greater distances away from the woke advocates who decided that global climate change required the wholesale adoption of bikes and scooters instead of cars, and 500 square foot one-bedroom apartments costing \$4000 per month. Even in the Bay Area, which has median incomes well in excess of Los Angeles, this fictional "housing plan" has left thousands of approved high rise apartments unbuilt because they are financially infeasible, and has created gridlock conditions so bad that even commuters in counties adjacent to San Francisco have earned "supercommuter" status by spending more than 90 minutes per day on the road.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	California Community Builders / The Two Hundred	Submittal 0001443 Related Documents Link
0001443.08	<p>The Program EIR's deficiencies span every single environmental impact section based on the document's willful omission of any analysis of the mismatch of the plan's housing and transportation "solutions" with the urgent housing and transportation needs of the community. If the plan called for a housing solution consisting of \$1 million mansions, it's racist and exclusionary character would be obvious. In fact the plan does something much worse, by calling for \$1 million small condos (or equally costly rental apartments), because high density and even medium density housing costs 3-7 times more to build than two story homes, duplexes and townhomes. If the plan called for a transportation solution that banned driving every Friday, those who must be physically present-on time -at their job to remain employed and be paid would be grossly harmed, while those in the "keyboard economy" of college graduates working on agency plans and studies could happily remain in their pajamas clacking away on their computers at home. In fact the plan does just that, with a VMT reduction mandate from CARB that is the equivalent of eliminating a weekday of driving. (Although called GHG reduction in the plan, but counted as a GHG reduction by CARB only if it derives from VMT reductions per CARB's unlawful underground regulatory "guidance" to SCAG and other MPOs). Construction workers, nurses, teachers, emergency responders, and the hundreds of other job categories that require physical presence onjobsites can't do their work wearing jammies in their kitchen- and these workers, and the region's economy, need a transportation system that actually works.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	California Community Builders / The Two Hundred	Submittal 0001443 Related Documents Link
0001443.09	<p>Also included in this comment letter, as a separate comment for which responses are required, is the 200's lawsuit against the four anti-housing measures in the CARB scoping plan, which includes in detail the adverse physical consequences to the environment of these measures - inclusive of the VMT reduction mandate, and imposition of higher costs and litigation obstacles to housing. These are the same impacts ignored in the Program EIR for the draft SoCal Connect Plan. The Program EIR is also fatally flawed in failing to acknowledge, and assess the impacts of, accommodating the 1.34 million new homes assigned to the region in the latest Regional Housing Needs Assessment (RHNA) cycle, or SCAG's preliminary allocation of new housing obligations among the counties and cities of the region which constitutes the best available information about the future location of this planned growth, or the SCAG Board's endorsement of requiring most of the new housing units - 1 million - to be built in Orange and Los Angeles county. The 200 takes no position on whether this is an accurate housing number, or whether SCAG's initial distribution of these units is appropriate or final. CEQA, however, requires that this additional housing be assessed as part of the cumulative impact analysis under every CEQA threshold of significance used in the Program EIR, and otherwise required by CEQA. The Program EIR also violates CEQA by failing to identify, and implement, all feasible mitigation measures for each of the dozens of significant unavoidable impacts identified as consequences of SoCal Connect Plan implementation. CEQA requires the full and complete assessment even of feasible mitigation measures that are outside the jurisdiction and control of SCAG itself to implement or enforce, and includes the lead agency's (SCAG's) obligation to identify such measures as being within the jurisdiction and control of specified other agencies which SCAG believes can and should implement such measures. SCAG cannot escape CEQA compliance because it is politically difficult, technically complex, or requires an assessment of the reasonably foreseeable consequences of failing to provide housing solutions that the region's people can afford or transportation solutions that the region's people actually need.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	California Community Builders / The Two Hundred	Submittal 0001443 Related Documents Link
0001443.10	<p>The 200 implores SCAG, which has done tremendous analysis and work for decades, to apply its own knowledge to develop an alternative regional land use and transportation plan that actually does provide housing that is affordable for purchase by median income families, and transportation solutions that do ease congestion and reduce gridlock. Part of this solution is undoubtedly some high density housing in the wealthiest neighborhoods where \$1m condos and \$4000 rents are in fact affordable. Virtually none of the solution for median and above-median income families can be paid for by taxpayers, given the overwhelming needs and extraordinarily high cost of providing housing for the homeless, special needs populations, and the lowest income families. Practical solutions for solving the housing and transportation crisis will reduce GHG by preventing the need for people to move to high GHG states to find housing they can afford, and clean car and other transportation sector legal mandates will reduce GHG just as smog was reduced from a combination of emerging technologies and actual rulemaking rather than underground regulations. The preparation and analysis of an alternate housing and transportation plan that actually complies with SB 375's mandate to accommodate the housing, transportation, and economic expansion of the region will require recirculation of the Program EIR. An honest and legally adequate assessment of the draft SoCal Connect plan's adverse environmental, health and safety consequences - and the legally adequate identification and assessment of feasible mitigation measures in and outside SCAG's jurisdictional reach - will also require recirculation of the Program EIR. Finally, the legally required cumulative impact assessment of accommodating the RHNA housing allocation for the region - all of which is to occur within the earlier years of the planning horizon used in the SoCal Connect plan, will likewise require revision and recirculation of the Program EIR.</p>	<p>Comment noted. See the Sustainable Communities Strategies Technical Report regarding housing affordability. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	California Community Builders / The Two Hundred	Submittal 0001443 Related Documents Link
0001443.11	<p>It is immoral, and unlawful, for any public agency in California to worsen the homelessness and housing crisis. It is immoral, and unlawful, for any public agency in California to discriminate against minority families, or worsen poverty for the 40% of Californians who cannot meet their monthly expenses. SCAG has no history of such immoral and unlawful conduct, and - when handed a racially discriminatory and unlegislated mandate by a state agency like CARB - should resist the lure of joining in the long line of California agencies that engaged in intentionally discriminatory redlining practices. The 200 has two videos - the history of redlining, and CEQA as redlining- on its website at https://www.thetwohundred.org/. The 200 urges SCAG staff and leaders to reconsider the plan, and substantially revise the Program EIR. Finally, we understand that SCAG staff is concerned that delaying approval of the unlawful SoCal Connect Plan and Program EIR pending completion of a lawful and effective housing and transportation plan for the region could cause the United States Environmental Protection Agency (EPA) to determine that the region is in nonconformance with Clean Air Act mandates. Members of The 200 have a long history, and very high success rate, in persuading both federal and state agencies - with and without lawsuits - to stop engaging in racially discriminatory practices. Given California's willingness to sue the current federal administration on environmental matters, and the emergency nature of the California homelessness and housing crisis, we would be pleased to assist SCAG in advocating for the necessity of a one year extension for the conformity determination. There is also precedent for this one year extension in San Diego. Unsubstantiated hypothetical fears of a delayed conformity determination to force approval of an infeasible and discriminatory housing and transportation plan is, bluntly, elevating bureaucratic bean counting over the actual needs of actual people.</p>	<p>Comment noted. See the Sustainable Communities Strategies Technical Report regarding housing affordability. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001443.12	<p>Please do not hesitate to contact us if you have any questions, would like any further information, or would like to discuss a consensual path forward. Some of our members have been civil rights leaders for more than 50 years, and had hoped that civil rights laws had finally addressed the decades of de jure racial discrimination by public agencies. We commend to your collective attention <i>The Color of Law</i>, by Richard Rothstein, which describes in detail the scores of residential housing discrimination practices inflicted on minorities by state and local agencies in California. Mr. Rothstein calls this the "forgotten" history of redlining in America. We have not forgotten, and stand ready to litigate -as a last resort - to prevent the recurrence of redlining under the bureaucracy's new favorite label of climate change. We can reduce GHG emissions; we cannot deprive minorities of attainable homeownership and effective transportation solutions.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	California Cultural Resources Preservation Alliance, Inc.	Submittal 0001446 Related Documents Link
0001446.01	<p>Dear Connect SoCal Team: Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, California Cultural Resource Preservation Alliance, Inc. (CCRPA), is now a part of this growing coalition in 2020.</p> <p>CCRPA works in Los Angeles and Orange counties and has since 1998. Our mission is to protect and preserve cultural resources such as sacred sites, archaeological sites, historic sites, and Traditional Cultural Places in Southern California with a focus on Orange and Los Angeles Counties. Preservation of natural and farmland results in the preservation of these cultural resources. We have had important successes since our inception including the preservation of the 100-acre, 7,000-year-old Tomato Springs site in east Irvine.</p>	Thank you for your comment. Comment noted.
0001446.02	<p>We offer the following comments on the Natural and Farmland policy, goals, and next steps. Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. We wish to make sure that the protection of cultural resources is not overlooked. It has been estimated that 90% of archaeological sites in southern California have been destroyed to make way for development. We strongly support the preservation of open space as the means of protecting the remaining cultural and archaeological sites that are an important part of our national patrimony. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands also filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water resources.</p>	Thank you for your comment. Impacts to cultural and archaeological resources are discussed in the Draft Connect SoCal Program Environmental Impact Report (PEIR). For responses related to the Draft PEIR, please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	California Cultural Resources Preservation Alliance, Inc.	Submittal 0001446 Related Documents Link
0001446.03	<p>The plan outlines that the region anticipates and additional 3.8 million people by 2045 providing increased pressure to our existing parkland. Existing studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (five acres per 1000 residents). As cities grow, more parks and more park access will be needed. What is the mechanism for this? Additionally, and more importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity activities, like turfed soccer and baseball fields. The types of land acquired as mitigation or through local conservation efforts typically focus on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing “more” access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. How additional access will be provided should be addressed, as well as how additional lands will actually be preserved. Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors prior to commencing impactful projects.</p>	<p>Thank you for your comment. Connect SoCal seeks to improve mobility, accessibility, reliability, and travel safety for the region's population, and promotes conservation of natural lands and restoration of habitats in urban, suburban and rural settings. More information about local park access can be found the Environmental Justice Technical Report. SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Furthermore, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>
0001446.04	<p>Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I can be reached at 949 559-6490. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to p.martz@cox.net.</p>	<p>Thank you for your comment. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of conservation strategies. Your group is encouraged to participate in the effort, and we will send notifications about upcoming opportunities to the provided email address.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.01	<p>The California Department of Transportation (Caltrans) wishes to thank the Southern California Association of Governments (SCAG) for the opportunity to review and comment on the Draft Connect SoCal, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR). Caltrans applauds SCAG's use of innovative techniques and methodologies in engaging constituents within its six-county jurisdiction through its "Bottom-Up Local Input and Envisioning Process". Building upon the previous 2016 RTP/SCS, the Draft Connect SoCal plan boldly implements sustainable planning strategies aimed to increase active transportation plans and products, increase ridership and use of various forms of transit, improve the infrastructure of goods movement, reduce congestion and Vehicle Miles Traveled (VMT), and create more diverse and affordable housing; while reducing greenhouse gases and advancing healthy communities amongst other transformative efforts. The Draft Connect SoCal plan was distributed to Caltrans' Headquarters and Districts 7 (Los Angeles and Ventura Counties), 8 (San Bernardino and Riverside Counties), 11 (Imperial County), and 12 (Orange County). The offices within each District and Division were given the opportunity to review and comment on the Draft RTP/SCS and Draft PEIR documents according to the California Regional Transportation Plan Guidelines. Connect SoCal's core vision coupled with its goals and guiding principles helps to further an interconnect region. Moreover, SCAG's commitment to strengthen previous investments in our multi-modal transportation system and with focused direction for future plan investments results in increasing the region's overall resiliency, prosperity and competitiveness. Specific comments on the Draft RTP/SCS chapters and appendices are included in Attachment A and specific comments on the PEIR are included in Attachment B.</p>	<p>Thank you for your comments on the Connect SoCal and associated PEIR. Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10, Corrections and Additions, of the Final Connect SoCal PEIR.</p>
0001549.02	<p>Caltrans Headquarters - Office of State Planning¹. The introduction is clear and informative on the regulations that guide the RTP development process however, RTP's are also influenced by the policies leveraged by the State. Suggest including additional language on SB 391 (2009) which also requires the California Department of Transportation to prepare the California Transportation Plan (CTP), California's long-range transportation plan. Reference to the CTP would illustrate the interrelationship between regional and statewide transportation objectives - highlighting how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals. Consider the following: "To better coordinate with the State, Connect SoCal was developed to align with The California Transportation Plan (CTP). The CTP is a long-range statewide level transportation plan that combines regional transportation and land-use plans to produce a unified multimodal strategy to achieve our collective vision of a lasting and well integrated transportation system that benefits both people and goods over the next 25 years."². While the plan is visually appealing and easy to read, consider including discussion on other Caltrans modal plans where necessary. With regards to the transportation complexities that exist throughout the State, differentiating the statewide goals from local/regional needs helps emphasize the challenges associated with transportation targets set forth by the State. Doing so also highlights the strategies proposed within the Connect SoCal to address transportation shortfalls within the SCAG region.</p>	<p>Comment noted. SCAG will take your recommendations into consideration.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.03	<p>Caltrans Headquarters- Aviation & Aeronautics1. Land use and zoning around airports is an important element to consider and guidance can be found in the California Airport Land Use Planning Handbook (Handbook). Land use compatibility with an adopted general plan is the responsibility of each Airport Land Use Commission (ALUC). Airport Land Use Compatibility Plans should be regularly updated and reference current general plans to prevent incompatible land uses that encroach upon or threaten airport operations. Airports enable the movement of people and goods. They allow a community access to the nation's air transportation system. Airports are a valuable community resource enabling public services, such as medical transport and law enforcement. Future uses may include freight and package delivery as the use of Unmanned Aerial Systems (UAS) develops.2. Traffic congestion is one of the leading issues in transportation planning. The emerging concept urban air mobility (UAM) is expected to provide a new solution by making use of the three-dimensional airspace to transport passengers and goods in urban areas. Airport Shuttle and Air Taxi markets are viable markets. We are aware of Uber announcing Los Angeles as one of the first cities to offer Uber Air flights, with the goal of beginning demonstrator flights in 2020 and commercial operations in 2023. The City of Los Angeles is creating an aerial mobility network integrated with its other transportation systems and investments.3. UAM largely is dependent on vertical takeoff and landing (VTOL) operations in urban areas. UAM application is to build well-distributed infrastructures to support VTOL aircraft operations. Those infrastructures are heliports and vertiports (or sky ports), where VTOL aircrafts take off and land, onboard or disembark passengers, and get charged. The Federal Aviation Administration has Advisory Circular 150/5390-2C to provide guidance on permitting and siting heliports.</p>	<p>Comment noted. Along with collaborating with the airports, Caltrans, the (city and local) transportation commissions and agencies, and the federal agencies (e.g. Federal Aviation Administration, Federal Highway Administration), SCAG works with the Airport Land Use Commissions (ALUC) in the region. For instance, the regional forecast (FAA-Terminal Area Forecast and airport activity numbers) and the airport level forecasts (provided to SCAG by the airports) were forwarded to all (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) of the county ALUCs in the SCAG region. As SCAG completes the Connect SoCal, the approach going forward will be to continue working and building partnerships with the county ALUCs in the SCAG region. In addition to the collaboration and communication with different government agencies and associations, SCAG is also monitoring new technology and legislation that can potentially impact the transportation system. Urban Air Mobility (UAM) and Vertical Take-Off and Land (VTOL) technology are addressed in Connect SoCal in different technical reports (e.g. "Emerging Technologies", "Aviation and Airport Ground Access), and are of interest to SCAG due to their potential impacts on regional mobility, safety, and the environment. Part of the monitoring of new technologies includes communicating with industry representatives. SCAG meets with representatives from UAM and VTOL companies on a regular basis. Furthermore, while not involved in the regulation and permitting of aircraft, SCAG continues to follow the efforts of the FAA to monitor and regulate new aircraft technology, including UAM and VTOL, especially as more companies go online. For instance, SCAG staff recently attended a presentation by Raquel Girvin, which included information on VTOL and drones. As part of the ongoing research, analysis, collaboration, and planning, SCAG will refer to the FAA Advisory Circular 150/5390-2C for further guidance on VTOL technology.</p>

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<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.04	<p>4. Significant legal/regulatory, certification, permitting/licensing, infrastructure, and weather constraints exist for currently operating aircraft. Vertiport or heliport locations should be carefully reviewed with consideration of its impact on potential UAM demand, safety, environmental impacts, land uses, energy distribution and demand, and transportation system performance. 5. Can SCAG's RTP/SCS draw from Air Cargo projections and congestion/demand management strategies to formulate planning for logistics impacts from the growing consumer demand for home deliveries? 6. Please note below the following Codes for implementation in the Aviation input into the SCAG Draft RTP and its Aviation Technical Appendix: • PUBLIC UTILITIES CODE- PUC--- • DIVISION 9. AVIATION [21001 - 24451] • (Division 9 added by Stats. 1953, Ch. 151) • ARTICLE 3.5. Airport Land Use Commission [21670- 21679.5] • (Article 3.5 added by Stats. 1967, Ch. 852) • SCAG also note: 21670.2. • Sections 21670 and 21670.1 [These are the sections that require ALUGs in any county with public-use airports-DOC] do not apply to the County of Los Angeles. In that county, the county regional planning commission has the responsibility for coordinating the airport planning of public agencies within the county. In instances where impasses result relative to this planning, an appeal may be made to the county regional planning commission by any public agency involved. The action taken by the county regional planning commission on an appeal may be overruled by a four-fifths vote of the governing body of a public agency whose planning led to the appeal. http://planning.lacounty.gov/aluc7. And, to clarify, our Cal. Aviation System Plan (CASP) update is not for the 2016 Policy Element directly. We're following a required 5-year update cycle, but the Plan will embark on a new course without "elements;" instead aligning with CTP 2050 to assist inter-modal goals.</p>	<p>Comment noted. As discussed in the "Regulatory Framework" section of the Aviation and Airport Ground Access Technical Report, while MPOs do not have regulatory, certification, or funding authority over airports, airspace, and aircraft, MPOs do play a critical collaborative and consultative role with the airports, transportation agencies and commissions, and federal agencies, including the Federal Aviation Administration (FAA). Authority over aircraft certification and regulation, including new aircraft technology such as Urban Air Mobility, and air navigation and safety, fall under the jurisdiction of the FAA. Moreover, as an MPO, SCAG is concerned with the airports and aviation system primarily from the perspective of surface transportation, and ground access to and from the region's airports. However, as discussed in the "Regulatory Framework" section, U.S. Code and FAA guidance encourages MPOs to maintain a collaborative and consultative role with the airports and the FAA. As part of the collaborative and consultative role MPOs play in aviation systems planning, SCAG closely monitors new developments in technology and legislation, including regulation and land-use, as they impact safety, mobility, and the environment in the SCAG region. For instance, the Emerging Technology Technical Report subsection, "Medium to Long Term Technologies," highlights vertical take-off and landing aircraft. In addition to monitoring and highlighting technology and legislation, SCAG works closely with the airports, transportation commissions and agencies, Caltrans, and the federal agencies (e.g. FAA, Federal Highway Administration) regarding the airports and regional transportation planning. SCAG's collaboration with the different agencies and jurisdictions includes both passenger and goods movement in the region. Specifically concerning the impact of air cargo on logistics and the surface transportation system, the Goods Movement Technical Report addresses the air cargo system and regional trade flows. In particular, the "Airports" and "Air Cargo and Regional Trade Flows" sections address the impact that the rapid growth of air cargo in the region has had on the SCAG region's transportation system, and the section, "Connect SoCal – Achieving the Regional Goods Movement Vision" highlights different strategies and projects designed to address the growth in cargo and freight activity within the region. As part of the ongoing effort to plan for the safe, environmentally sound, and effective transportation of people and goods in the region, SCAG will continue to collaborate, communicate, and coordinate with Caltrans, the transportation agencies and commissions, the airports, and the FAA and other federal agencies.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.05	<p>Caltrans Headquarters - Office of Regional PlanningThe Office of Regional Planning (ORP) would like to commend SCAG for their vivid and creative approach to demonstrating SCAG's 20-year vision for the future.Overall, the page references on the RTP Checklist included whole chapters and entire technical reports. We recommend that SCAG reference specific page numbers for each question on the RTP Checklist with their Final RTP submission.Below are the following comments in reference to the RTP Checklist Contents:General#2. The document identifies several strategies but does not delineate whether they are short-range and long-range strategies/actions (23 CFR 450.324(b)).#3. There is mention of the elements required throughout the report, but as a public document this checklist should reference more specific pages instead of whole chapters and technical reports. Also, the report doesn't have specific sections dedicated to each element i.e. policy, action, and financial (California Government Code Section 65080). These elements should be clearly defined and easily accessible by specific page numbers.#4(a). The referenced pages are missing the general location of uses and building intensities. (HQ referring to the page numbers that SCAG identified on the RTP Checklist. SCAG should ensure 4(a) of the RTP Checklist is fully addressed, specifically, the general location of uses and building intensities within the region).#4(b). There is a lot of information to decipher and it is not clear that SCAG identified areas within the region sufficient to house all the population of the region, including all economic segments of the population over the course of the planning period of the regionaltransportation plan taking into account net migration into the region, population growth, household formation and employment growth.#4(h). SCAG identified one map on page 23 of their SCS Technical Report (HQ is referring only to the SCS. It seems that SCAG labeled all of their appendices with "Technical Report," but the specific requirement in RTP Checklist 4(h) refers to the SCS requirement).This does not set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the ARB.</p>	An updated checklist for the Final Connect SoCal will be shared with Caltrans after plan adoption.

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.06	<p>#7. The outdated RTP Checklist that SCAG provided did not include question 7. Please provide the appropriate page references with an updated checklist.Consultation/Cooperation#3. It is difficult to clearly determine that SCAG consulted with the appropriate State and local representatives including representatives from environmental and economic communities; airport; transit; freight during the preparation of the RTP (23 CFR 450.316(b)). Please identify the specific pages for reference.#4. Please ensure that the final plan includes reference that federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP (23 CFR 450.316(d)).#5. It is difficult to determine where the RTP specifies that the appropriate State and local agencies responsible for land use, natural resources, environmental protection, conservation and historic preservation were consulted (23 CFR 450.324(g)).#6. Please include specific page reference that the RTP includes a comparison with the California State Wildlife Action Plan and (if available) inventories of natural and historic resources (23 CFR 450.324(g)(1 &2)).#15. It is not clear that the RTP will be adopted on the estimated date provided in writing to State Department of Housing and Community Development to determine the Regional Housing Need Allocation and planning period (start and end date) and align the local government housing element planning period (start and end date) and housing element adoption due date 18 months from RTP adoption date (Government Code 65588(e)(5)).Programming/Operations• The outdated RTP Checklist that SCAG provided did not include a Programming/Operations Section. Please provide the appropriate page references for each question on the updated checklist.Financial#4. It is difficult to determine which projects are regionally significant. Please ensure that all regionally significant projects are identified (Government Code 65080(4)(A)).#9. In the Transportation Finance Technical Report neither TCMs or SIP is mentioned. · Please ensure that the final RTP address the specific financial strategies required to ensure the identified TCMs from the SIP can be implemented (23 CFR part 450.324(f)(11)(vi)).</p>	<p>The revised updated checklist was shared with Caltrans on 01/09/2020. The checklist for the Final Connect SoCal will be shared with Caltrans after plan adoption.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.07	<p>Caltrans Headquarters- Office of Freight Planning Overall, much of the Plan, specifically the Goods Movement Technical Report, includes vague and broad statements that are either not supported directly by data, analysis, or supporting evidence, or are supported with indirect and loosely (at best) related data and analysis. When data is sourced, it is cited in a way that makes it impossible to fact-check it or replicate the analyses. The language is so broad and vague that the plan does not leave the reader with a clear understanding of how the system works. For example, each goods movement mode is independently discussed within its section, and the plan is missing a section (discussion) that ties together and analyzes all the freight modes for a true multimodal freight system. The Plan's structure, styles, multicolor headings are confusing to read and difficult to identify the section relationships (e.g., main and subsections). We have listed main comments below.</p> <p>Draft Connect SoCal</p> <ol style="list-style-type: none"> 1. Broad and a Vague Content with Limited Supporting Data and Analysis 2. Page 74 through 82, A significant portion of the main body includes broad and sweeping claims with limited, if any supporting data and analysis. 3. Page 81, Table 3.3, SCAG Region Airport Passenger Forecast for 2020-2045 (no citation) 4. Significant portions of supporting data are either not cited or not properly cited. As a result, this data cannot be checked for accuracy, and the analysis cannot be replicated. For charts with multiple data sources, one cannot determine what source is attached to the data. 5. Provide professional citations. For example, see page 78, Truck Bottleneck Relief Strategy and Industrial Warehouse & Distribution Centers 6. Missing Significant Freight Information 7. Chapter 4 is missing a discussion of National Highway Freight Program funding and the Trade Corridor Enhancement Program. 	<p>SCAG believes that the information in the Goods Movement Technical Report conforms to the citation style used throughout Connect SoCal. While each goods movement mode is discussed separately, it is important to note that each modal section discussion includes clear references and linkages to other modes and the overall goods movement system. Specifically, the section titled "Supply Chains and the SCAG Region" provides an overview of both international and domestic trade flows, modal movement types through three major system components (seaports, air cargo, and border crossings), and the five (5) most critical goods movement dependent industries (manufacturing, construction, retail, wholesale trade, and transportation and warehousing). These sections tie together how the regional multimodal system ties together. The structure, styles, and headings are an aesthetic consistent with the rest of Connect SoCal and not limited to the Goods Movement Technical Report.</p> <ol style="list-style-type: none"> 1. SCAG feels that the information in the Goods Movement Technical Report conforms to the citation style used throughout Connect SoCal. 2. Pages 74 through 82 includes a summary overview of goods movement in the region. It is not intended to be exhaustive. For more detail information, data, and analysis, please refer to the Goods Movement Technical Report.

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.08	<p>Goods Movement Technical Report (GDPR)The Goods Movement Technical Report contained very little technical information. We expected to find supporting data, analysis, and methodologies for planning the regional freight system. Instead, the information was only slightly more detailed than what we found within the main document. In fact, the GMTR included very little supporting evidence, and sources are not cited in a way that allowed the reader to fact-check or replicate the analysis.1. A section for Pipelines, a key and critical freight mode recognized by the U.S. Department of Transportation as well as the California Department of Transportation, is not included withinthis report. Include a Pipeline section with the other freight modal sections (e.g., Rail, Seaports, Airports, Highways)2. Significant portions of the main body and the GMTR include broad and sweeping claims with limited, if any supporting data and analysis. For example, there is no direct supporting data and evidence included in the a-commerce section. We see broad statements such as e-commerce has greatly increased, and that e-commerce has negatively impacted neighborhoods. However, we did not see any direct supporting evidence. We expected to see the number of increased trips related to a-commerce, but instead, we saw an increase in the dollars spent. This data does not support that there are more trips, as customers may be buying more expensive items or more items that are delivered on the same trip. Also, all forms of e-commerce a lump together. For example, Amazon purchases that are ordered online and delivered directly to the customer are combined with purchases that are ordered online at places like Target, Walmart, and Best Buy, where the customer can choose to pick up their purchase at the store. The store pick-up purchases are similar to the Sears Catalog (started in 1893) when customers ordered out of a catalog via the mail and picked up their purchases at Sears. We recommend separating the different types of "a-commerce" and addressing them individually.3. Page 5, First Paragraph: Define goods movement dependent jobs and provide examples for the industries</p>	<p>SCAG believes that the information in the Goods Movement Technical Report conforms to the citation style used throughout Connect SoCal.1. SCAG will address goods movement through pipelines in its upcoming update of the Comprehensive Regional Goods Movement Plan and Implementation Strategy.2. SCAG believes that the information in the Goods Movement Technical Report conforms to the citation style used throughout Connect SoCal. SCAG notes the growth in e-commerce value in the section titled "E-Commerce". The section specifically discusses data gathered from the U.S. Census Bureau's Monthly Retail Trade data and corresponding data for retail sales come from the Electronic Shopping and Mail-Order Houses industry classification, which is from the North America Industry Classification System (NAICS). This category is defined as "establishments primarily engaged in retailing all types of merchandise using means, such as catalogs, toll free telephone numbers, or electronic media, such as interactive television or the Internet. Much of the data about e-commerce sales is held by the private sector and proprietary. In addition, there is currently no consensus methodology for accurately measuring how specific goods tied directly to e-commerce move other than value. As to whether e-commerce increases or decreases consumer trips, SCAG included this comment in the body to indicate that the impact is unknown: "The ubiquity of e-commerce also begs questions related to the impacts of growing congestion (especially on neighborhood streets), competition for valuable curb space for deliveries and whether vehicle-miles-traveled (VMT) are decreasing as a result of consumer trip substitution or increasing as consumers simply buy more online."</p>

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0001549.09	<p>4. Page 5, First Paragraph, "Jobs in goods movement dependent industries are generally well-paying, with annual average compensation in the construction, manufacturing, and wholesale trade sectors outpacing the average annual compensation for all regional industry sectors.": Support with specific data (not just averages) so that we can see the range in pay to the job. Using averages can greatly skew the results (e.g., low wage jobs offset by CEO salaries). Also, support with more data, including data sources (including reports, data tables) so that the analysis can be replicated.</p> <p>5. Page 6, Maintaining the Long-term Economic Completeness of the Region: Either provide useful information, data, and analysis or delete this section.</p> <p>6. Page 6, Promoting Local and Regional Job Creation and Retention: Provide supporting evidence and data. Provide the specific number of jobs that are created by the ports as well as the number of regional jobs created by "international trade activities." Define International trade activities. Also, link the infrastructure to the economy.</p> <p>7. Page 17, Distribution Centers, Warehousing and Transloading Facilities: This section includes unsupported statements and claims. Include supporting evidence and data, and professionally source and cite the data.</p> <p>8. Page 17, Consumer Base, "This growth in residents and income is expected to drive consumer spending and demand for goods, increasing pressure on the regional transportation network.": Support with evidence and data, and professionally cite the data source(s).</p> <p>9. Page 26, Highlight Area, Trade in the SCAG Region, First Paragraph: Define "current Administration" by giving its name. Also, is it regional, state, or federal?</p>	<p>4. The data for the average pay for jobs in goods movement dependent industries in the SCAG region is based on data from the U.S. Census Bureau's American Factfinder. SCAG collected data using the North American Industry Classification System (NAICS) codes for each industry. This data included the number of employees in each industry along with the annual payroll for each industry. To arrive at average pay for each industry for each year, SCAG divided the annual payroll by industry by its number of employees. The introduction of labor classifications from the Department of Labor's Equal Employment Opportunity (EEO) occupational codes and a subsequent division of these codes between "low-wage" jobs and "CEO salaries" exceeds the scope and intent of this information, to roughly indicate larger trends or regional goods movement dependent industries. Exploration of a more granular examination among occupational codes in goods movement dependent industries may be considered in subsequent and comprehensive technical analysis such as the upcoming update of the SCAG Comprehensive Regional Goods Movement Plan and Implementation Strategy.</p> <p>5. The section titled "Maintaining the Long-Term Economic Competitiveness of the Region" is intended to be a summary articulation of the overall vision for the regional goods movement system which is to support a world-class, coordinated Southern California goods movement system that accommodates growth in the throughput of freight to the region and nation in ways that support the region's economic vitality, attainment of clean air standards, and quality of life for our communities. It is not intended to be a technical analysis. The data and analysis are provided in the proceeding pages of the Goods Movement Technical Report.</p> <p>6. The section titled "Promoting Local and Regional Job Creation and Retention" is intended to be a summary articulation of the overall vision for the regional goods movement system which is to support a world-class, coordinated Southern California goods movement system that accommodates growth in the throughput of freight to the region and nation in ways that support the region's economic vitality, attainment of clean air standards, and quality of life for our communities. It is not intended to be a technical analysis. The data and analysis are provided in the proceeding pages of the Goods Movement Technical Report. Specifically, the report includes summary overviews of jobs related to the seaports, airports, and border crossings as well as those related to goods movement dependent industries. International trade is any trade that involves the exchange of goods across international borders and is self-evident. However, SCAG will add a footnote to define international trade. Finally, the report clearly links infrastructure to international trade repeatedly throughout the report and concludes with a list of infrastructure projects necessary to support goods movement in the SCAG region.</p> <p>7. SCAG feels that the information in the Goods Movement Technical Report conforms to the citation style used throughout Connect SoCal.</p> <p>8. An increase in the number people and spending power necessitates increased demand for goods and consequently greater amounts freight-related traffic on regional infrastructure to deliver said goods. The projected increase in population is noted in the Goods Movement Technical Report. For more information about demographic growth, including population and employment, please refer to the Final Demographics and Growth Forecast Technical Report.</p> <p>9. The preceding sentence discusses national policies for the U.S. and this sentence refers to the implementation of tariffs, which can only be administered by Congress or the President. "Administration" in this instance refers to the U.S. Presidential</p>

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0001549.10	<p>10. Most of the supporting data is either not cited or not properly cited. As a result, this data cannot be checked for accuracy, and the analysis cannot be replicated. For charts with multiple data sources, there is no way to determine what source is attached to the data. Provide professional citations. For example, when using the US Census data, include the Program (American Factfinder), the table (e.g., DP05), and the date(s) or when using the US DOT data, include the Program (FHWA), the report, table, website, and the date(s). This is important so that a reader can fact-check the data and replicate the analysis. Without this critical information, the reader must question the validity of the data and analysis. Examples include but are not limited to:-Page 4, Table 1-Page 7, Improving the Safety of Goods Moment Activities and Highlight Area: regional Goods Movement Workforce Development-Page 14 Exhibit 3-Page 15, Table 2, footnote 6, 7, and 8-Page 16, Figure 1, Airports, International Land Ports-of Entree-Page 17 Distribution Centers, Warehousing and Transloading Facilities, and footnotes 10 and 11-Pages 18 and 19, Highlight Area, Seaports and Regional Trade Flows, Figure 2, and footnote 13-Pages 20 to 34, Figure 3 to Figure 19, Footnotes 14, 17,18, 19, 20, 21,22,23, 25,26, 30 (FAF Version?), 31 ,32,33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47,48</p>	<p>SCAG feels that the information in the Goods Movement Technical Report conforms to the citation style used throughout Connect SoCal.</p>
0001549.11	<p>Miscellaneous Comments1. Page 3, What is Goods Movement? A pipeline, a key freight mode is missing from this section.</p>	<p>SCAG will address goods movement through pipelines in its upcoming update of the Comprehensive Regional Goods Movement Plan and Implementation Strategy.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.12	<p>1. Page 3, Broad Economic Benefits: As currently written, this section is not understandable. Consider rewriting this section to include a clear introduction, thesis statement, body paragraphs, a restatement of the thesis, and a conclusion.</p> <p>2. Page 3, Broad Economic Benefits - First Paragraph: Who uses "performance" as a proxy: Without a subject, the relevance of this statement is unclear. What is the difference between the performance of the logistics industry and the contributions of the five major industries? Why does SCAG consider contributions of the "five major industry sectors ..." more closely associated? Why were the agriculture and service industries (e.g., repairpersons) not included?</p> <p>3. Page 3, Broad Economic Benefits, Second Paragraph: Clearly link this discussion within this paragraph to the introduction above. As it is currently written, it is unclear how the GRP/GDP are connected (or not) with the five major industrial sectors. Also, what is "this economic impact"? Define "this economic impact."</p> <p>4. Page 3, Broad Economic Benefits, Third Paragraph: Clearly link this discussion within this paragraph to the first, introduction paragraph. Are the "good movement dependent industries" the same as the "five major industry sectors"? If not, how are they different. What is the difference between a sector and an industry? A layperson and technical expert should be able to read this and understand. As this is currently written, neither can.</p>	<p>1. SCAG feels this section is understandable, and without examples of specific issues to revise, no changes can be made. It is important to remember that this section is intended to be a summary introduction to the economic impacts of goods movement. The section provides an introduction to the industries that are most associated with the economics of goods movement, GRP contributions, job contributions, and linkages to physical infrastructure and gateways that facilitate trade. Subsequent data and analysis are found in the proceeding pages of the Goods Movement Technical Report.</p> <p>2. SCAG uses performance as a proxy. The logistics industry is one of the five major goods movement dependent industries encompassed within the transportation and warehousing sector. As stated in the first paragraph, SCAG considers the five goods movement industries as the best proxies because these industries most directly rely on the goods movement system and constitute the majority of GRP and jobs in goods-producing sectors. While the agriculture sector is important, its GRP and jobs contribution is not as large as the other five sectors. While the services sector does precipitate some goods movement activities, it is much less than the five goods movement industries.</p> <p>3. These two paragraphs are linked. Following the introduction of the five goods movement industries, the text says "One of the ways this economic impact is measured is through gross regional product (GRP). Similar to gross domestic product (GDP), which is often used as an indicator of a nation's economic health, GRP is a monetary measure of the market value of the goods and services produced in the region." The next paragraph then notes that economic impacts includes jobs in addition to GRP. Also, under the preceding section titled "What is Goods Movement?", it is noted that goods movement "supports industries and activities that provide jobs, tax revenue and resources that bolster innovation, creativity and access to local and world markets through trade." These are economic impacts.</p> <p>4. Thank you for the comment. SCAG feels these paragraphs are linked and it is clear that the five industries mentioned in the preceding paragraphs are the ones referenced here.</p>

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0001549.13	<p>5. Page 4, Table 1- Change in Average Annual Pay for Goods Movement Dependent Industries in the SCAG Region 2012-2016: The introduction sectors reference five sectors; this table includes seven sectors. Why?6. Page 5, First Paragraph: Define freight dependent jobs.7. Page 5, Regional Global Profile: Consider renaming this section the United States Global Profile as the narrative references the U.S. and not the SCAG region. Also, absent from this section is a discussion regarding the impacts of California's climate policies on So Ca Port's competitiveness with other U.S. and international ports.8. Page 5, Regional Global Profile- Second Paragraph: Consider rewriting this paragraph because it is confusing.9. Page 6, First Paragraph: Identity who expects them to grow and by how much? Support this statement with evidence.10. Page 6, Second Paragraph: Replace "recent" with a specific date and identify the specific shift(s) (e.g., percentages) and policies as well as the specific impacts of those shifts. It is not unusual for the federal reserve to adjust, so it is important that this statement is supported with evidence and a citation.11. Page 6, Goods Movement Vision: This vision is focused on freight movement; however, it should also focus on servicing the people (e.g., brings food and clothing to the people in the region). By focusing on throughput and other technical details, the basic needs that freight movement provides for are overlooked. It is helpful to plan for freight movement using a lens of what the region would look like without freight accessibility.12. Page 7, Increasing Freight and Passenger Mobility: Populate this section with useful information like specific strategies for improving goods movement and how the region is going to double rail volumes. Also, include the current freight performance by mode (or reference to a different section that contains that information) and what needs to be done to maintain that performance into the future.13. Page 7, Improving the Safety of Goods Movement Activities: Are there currently issues, if so, what are they?14. Page 7, Mitigating Environmental Impacts of Goods Movement Operations: Explain why and provide cited data, analysis, and evidence supporting this claim.</p>	<p>5. The table includes only the average pay for five goods movement sectors: manufacturing, wholesale trade, construction, retail trade, and transportation and warehousing. The subsequent row is the total average of the five goods movement dependent industries. The final row is the total average of the five goods movement industries minus retail which is normally low-paying. The final row is intended to show that aside from jobs in the retail industry, jobs in the other four goods movement dependent industry are rather well-paying. 6. Goods movement jobs are those in the five goods movement dependent industries defined throughout the report: manufacturing, construction, retail trade, wholesale trade, and transportation and warehousing. This is noted in the text under the header "Broad Economic Benefits" on page 3, Table 1 on page 4, and with the sentence on page 5 "Jobs in goods movement dependent industries are generally well-paying." It is also noted in the sections on the five goods movement dependent industries discussion in the "Domestic Trade Flows and Goods Movement Dependent Industries" section. SCAG has clarified the definition of a goods movement dependent job.7. The section is a high-level summary of the SCAG region and its role in the global supply chain. SCAG feels this title is appropriate and consistent with the content in the section. More information about climate change and the goods movement system can be found in the Goods Movement Environmental Strategy and Technology Advancement Plan section of the Final Goods Movement Technical Report. 8. Without specifics, it is difficult to revise as SCAG is unsure what is confusing about the text.9. In 2019, despite imports and exports from China being down 13 and 20 percent, overall Asian trade was only 2 percent below the historical average from 2003-2019. This means that many individual Asian countries saw a strong increase in trade for 2019. The SCAG region is still seeing nearly 85 percent of imports and just below 70 percent of exports from/to Asia. Unless supply chains substantially shift, regional market share is expected to remain heavily skewed towards Asia. Looking to China specifically, imports and exports are anticipated to increase through 2021. 2019 was a strong year for China overall, and near-term expectations are more tempered globally, especially as the impacts of the Coronavirus are assessed in 2020.</p> <p>10. The rate that the borrowing institution pays to the lending institution is determined between the two banks; the weighted average rate for all of these types of negotiations is called the effective federal funds rate. The effective federal funds rate is essentially determined by the market but is influenced by the Federal Reserve through open market operations to reach the federal funds rate target. In this context, "recent" refers to the time period prior to the recent recession. Per historical trends from the Federal Reserve Bank of St. Louis, the effective federal funds rate in November 2019 stood at 1.55 percent versus 5.25 percent in 2007 prior to the recent recession. While rates grew during the recovery from 2015 - mid-2019, they are once again dropping. Since 1960, rates have only been lower than 1.55 percent three times. SCAG will update the text to clarify this information. 11. Comment noted. SCAG identifies that freight serves the needs of businesses and consumers multiple times in the Goods Movement Technical Report.12. The section is intended to be a summary articulation of one goal of the overall vision for the regional goods movement system which is to support a world-class, coordinated Southern California goods movement system that accommodates growth in the throughput of freight to the region and nation in ways that support the</p>

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region’s economic vitality, attainment of clean air standards, and quality of life for our communities. It is not intended to be a technical analysis. The requested information related to system performance is provided in the proceeding pages of the Goods Movement Technical Report.13. The section is intended to be a summary articulation of one goal of the overall vision for the regional goods movement system which is to support a world-class, coordinated Southern California goods movement system that accommodates growth in the throughput of freight 14. The section is intended to be a summary articulation of one goal of the overall vision for the regional goods movement system which is to support a world-class, coordinated Southern California goods movement system that accommodates growth in the throughput of freight to the region and nation in ways that support the region’s economic vitality, attainment of clean air standards, and quality of life for our communities. The importance of mitigation, data and analysis are provided in the report, particularly in the section titled Goods Movement Environmental Strategy and Technology Advancement Plan.

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<i>Submitted by</i>	California Department of Transportation	Submittal 0001549 Related Documents Link
0001549.14	<p>15. Page 7, Highlight Area: Regional Goods Movement Workforce Development, Second Paragraph, First Sentence: "Currently, the U.S. is nearing, or at, full employment": Provide properly cited data supporting this claim. Also, link this to the SCAG region. 16. Page 9, First Paragraph: Define "dead-end-jobs." 17. Page 9, Seaports First Paragraph: Footnote 2: The WSC is a group. Please include a specific source (interview, report) that is properly cited so that readers can find the documentation of this statement. 18. Page 9, Seaports, "percent of all containers in the U.S. moving through the San Pedro Bay Ports. 3 Despite some recent modest shifts in container volumes to other U.S., Canadian and Mexican ports, the total container volume for the San Pedro Bay Ports is still expected to grow to over 34 million by 2045, a 120 percent ... ": How was this analysis performed. What is the data source (including citation)? Model type, name, version? 19. Page 9, Seaports, "35 percent of the San Pedro Bay Ports' total import-related traffic. The other 65 percent is assumed ... ": Did this data also come from footnote 3? If not, source the data, and provide a professional citation. 20. Page 9, Seaports, Third Paragraph - "deconsolidation of the contents": Define for laypersons. 21. Page 9, Seaports, Third Paragraph - "Transloading allows for the movement of increased amounts of goods while ... ": This statement may or may not be correct. For example, it may be that the region has gotten to the point that the transportation system is so congested that there is no capacity to support any more trips (freight or other) regardless of container. So, provide data, analysis, and supporting evidence for this claim as it relates to the current and future SCAG freight system. 22. Page 10, Railroads, First Paragraph, First Sentence, "Critical to the growth": Demonstrate how BNSF and UP are critical to SCAG's growth. For example, what functions do they play in SCAG's economy? Support with professionally cited data and evidence.</p>	<p>15. SCAG has added clarification to indicate that many economists define full employment as any time a country has a jobless rate equal or below what is known as the "non-accelerating inflation rate of unemployment," or NAIRU. This is the theoretical level of unemployment at which inflation would be expected to rise. While there is no formula for calculating a NAIRU level, the Federal Reserve estimates that the NAIRU level is somewhere between 5% to 6% unemployment. According to the U.S. Bureau of Labor Statistics, the current unemployment level in the U.S. in January 2019 was 3.6 percent. The unemployment rate for the SCAG region was approximately 3.7 percent in the same period according to the California Employment Development Department (EDD). Both are below the NAIRU level indicating the MSA is at or near full employment. While there are some limitations to NAIRU, it is a sufficient indicator to show overall employment trends in the region for the purposes of this plan. 16. For the purposes of the Goods Movement Technical Report, the term "dead-end" jobs referred to those jobs with little-to-no opportunity for career or wage growth. SCAG has changed the text to clarify. 17. The citation style is consistent with the MLA citation style used throughout Connect SoCal. 18. The growth in the number of containers moving through the San Pedro Bay Ports is based on the latest twenty-foot equivalent (TEU) forecast from the Ports of Los Angeles and Long Beach conducted by Beacon Economics. A citation has been added. 19. SCAG feels that the information in the Goods Movement Technical Report conforms to the citation style used throughout Connect SoCal. 20. A footnote defining deconsolidation has been added. 21. By consolidating, or combining smaller cargo shipments into larger shipments, shippers are able to use less equipment, expend less fuel, and better allocate other resources such as labor to reduce costs. The cost savings resulting from these activities outweigh the costs of congestion. However, it is also important to note that shippers also use transloading for other reasons including to 1) better manage inventory and to minimize sales forecast errors, 2) consolidate high demand product into a minimal number of containers, expedite unloading at destination, 3) save on transportation costs when the inland location has limited export volume, leaving ocean carriers to reposition empty marine containers, and 4) perform value-added services on products to make them store-ready or easier to handle upon arrival at destination. 22. Class I railroads are defined by the Surface Transportation Board as those with revenue thresholds "having annual carrier operating revenues of \$250 million or more in 1991 dollars," which adjusted for inflation was approximately \$465,8701 in 2019. Per research from the Towson University Regional Economic Studies Institute commissioned by the Association of American Railroads in 2017, railroads, and their investments, make economic contributions by supporting jobs, providing connections to domestic and global markets for regional businesses, easing the burden on regional railways, and promoting growth of local communities through the infusion of funds into the market and government budgets. SCAG has added a citation indicating this in the Final Goods Movement Technical Report.</p>

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0001549.15	<p>23. Page 12, Second Paragraph: Who reduced the number of times freight itself(?) was handled, how was the freight handled, and what is the base year for the speed, efficiency, damage, and security. What year was the performance assessment developed that measured these items and identified that the efficiency and speed increased, the damage was reduced, and security became greater? Was the same base year and performance year used for all six intermodal terminals? Did all terminals follow the same methodology and use the same data? Support with professionally cited data and analysis.24. Page 12, "In addition to these intermodal terminals, there are railyards that serve carload traffic of various types. UP has a large carload freight classification yard at West Colton (at the east end.": Does this section capture all the rail yards that serve carload traffic of various types?25. Page 15, Airports, First Paragraph: It appears that multiple data sources and perhaps years were used to produce the number included in this section. With this said, there is a real concern that the analysis is comparing "apples with oranges" or that selective data was used.26. Page 16, Figure 1 Air Cargo Tonnage through SCAG Regional Airports 2000-2018: It appears that this table was constructed based on a mix of data and analysis that is not consistent. I suspect that this is a comparison of apples and oranges. See my comments regarding the data sources.27. Page 17, Supply Chains and the SCAG Region: Consider rewriting this section so that a layperson can understand. For example, what are product demand forecasting and production planning?</p>	<p>23. Intermodal facilities increase efficiency and decrease supply chain costs for shippers. Some of the major functions performed in intermodal facilities include the transfer of cargo between modes, freight assembly in preparation of transfer, freight storage, logistical control and distribution of product flows. Concentrating these operations in one location can allow for savings realized through economies of scale. Finally, there may be increased security, for example, as goods are not normally at rest and are continually moving. SCAG has added a citation noting this. 24. The intent was to capture the major/core rail yard facilities including intermodal rail yards, classification yards, and auto facilities. These do not include other capacity/operating areas like siding/staging track areas for car equipment, locomotive/railcar maintenance yards, or other access/operational capacity locations. 25. Airport data is provided from multiple sources in varying units. For example, the FAA provides landed cargo weight including the weight of each airplane and its cargo. Many airports directly report cargo in tons, but can include metric/short tons and even weight. The varying data sets were used to validate multiple sources to confirm that information provided from Caltrans was consistent with information directly reported from the Los Angeles World Airports (LAWA) and Ontario International Airport. Total tonnage from these three sources matches 1:1. In addition to total tonnage, LAWA and Ontario provide further details including domestic versus international tonnage, mail-related tonnage, and even enplaned versus deplaned tonnage by domestic and international. This information is necessary to do similar comparisons between seaports and land ports for import/export and domestic trade flows. 26. Airport data is provided from multiple sources in varying units. For example, the FAA provides landed cargo weight including the weight of each airplane and its cargo. Many airports directly report cargo in tons, but can include metric/short tons and even weight. The varying data sets were used to validate multiple sources to confirm that information provided from Caltrans was consistent with information directly reported from the Los Angeles World Airports (LAWA) and Ontario International Airport. In addition to total tonnage, LAWA and Ontario provide further details including domestic versus international tonnage, mail-related tonnage, and even enplaned versus deplaned tonnage by domestic and international. This information is necessary to do similar comparisons between seaports and land ports for import/export and domestic trade flows. 27. Comment noted.</p>

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0001549.16	<p>Caltrans District 7 - Freight Planning Goods Movement Technical Report 1. Last mile Delivery-page 2. METRO sponsored a conference in this regard, and it was also a focus in conjunction with INUF Conference in 2019. A more extensive discussion was expected. Additionally, no discussion provided on "First mile." 2. Page 16 of 32-Exhibit 3: -The "SR-206" shield should be Interstate 215. (same comment on exhibit 6 on page 52 of 132) -The "SR-30" shield should be SR-210. -The "1-210" shield that is shown to the right of the juncture of SR-57 and 210 should be SR-210 (Interstate 210 becomes SR-210 at the junction with SR-57. -Recommend the "county lines" are shown in different color as they are very similar to the highways not identified as part of the "Primary Highway Freight System." -What year is the US DOT source?-NOTE: To the extent above information occurs in other exhibits, this should be considered a global comment. • East-West Corridor-page 51. There is no "project scope" information, and no reference to any project(s) in the list of projects. • Appendix 1 of 1-page 123. Although multiple footnotes are from 2019, the discussion provided does not seem to include the most current information related to POLA (and possibly POLB) in this regard.</p>	<p>1. Comment noted. First mile is covered extensively in the sections dealing with goods imports and exports transiting seaports, border crossings, and airports, and the sections on goods movement dependent industries. Additionally, last mile delivery was covered as a highlight area and SCAG anticipates the release of its Last Mile Freight Delivery study in the coming months. 2. The symbols have been updated. The county lines will remain for consistency with the rest of Connect SoCal. SCAG will add the date of the PHFS. As mentioned, the East-West Freight Corridor (EWFC) requires further analysis based upon the preferred alternative for the I-710 corridor. The EWFC is included in the Goods Movement Project List as items B.2 through B.4 within the Section B. Freight Corridor System. The information conveyed in Appendix 1 is consistent with up to date information from the POLA and POLB. Moreover, port staff were consulted in the development of this appendix.</p>
0001549.17	<p>Page 34 - Exhibit 2.5- There are lots of gradients in the LAIOC region; suggest doing a zoom box to show the land use breakdown in better detail.</p>	<p>Exhibit 2.5 is provided to give an overall snapshot of the general distribution of major land use types throughout the region. For more detailed land use information it is best to get the most recent data from each respective local jurisdiction.</p>
0001549.18	<p>Page 40- Figure 2.5/2.6 (and other graphs throughout)- Color choices for poor and good are very similar, which makes it hard to read tables quickly.</p>	<p>Comment noted. SCAG will consider different color schemes for future cycles.</p>
0001549.19	<p>Page 59: Core Vision- Paragraph 1: Fix-It First is commonly associated with the SHOPP program; suggest mentioning it here.</p>	<p>Comment noted.</p>
0001549.20	<p>Planning for 2045- typos in Line 1</p>	<p>Comment noted. Changes have been made to the System Preservation & Resilience Core Vision section.</p>
<p><i>Submitted by</i> California Department of Transportation Submittal 0001550 Related Documents Link</p>		
0001550.01	<p>Page 69 -Active Transportation -"Walking and bicycling are accessible forms of transportation for people of all ages, abilities and socioeconomic backgrounds." This is not technically for certain abilities. Line could be read as exclusionary.</p>	<p>Thank you for your comment. The Active Transportation Technical Report defines a pedestrian as "any person walking, skateboarding, using a wheelchair or other personal mobility device." Language will be added to the main book to ensure that the inclusive intent of the referenced sentence is properly interpreted.</p>
0001550.02	<p>Page 77- Express Lanes Table Line 3- Los Angeles -1-405 -Add 1-105 Express Lane (Should be add 1-405 Express Lane?)</p>	<p>Comment noted. Comments have been addressed in the Final Connect SoCal.</p>
0001550.03	<p>Page 163 - Measure R - Measure R has no sunset as of Measure M's approval.</p>	<p>Comment noted.</p>
0001550.04	<p>The goal of maintaining and rehabilitating the existing system is a laudable goal. The goal, according to SB-1, is to have 98% of the state highway system in each county operating at Good or Better condition by 2045. Table 1 on page 9 gives 47.9% of the statewide interstate highway system operating at Good in 2017. The only data in the report on pavement condition suggests a 3.4% drop over 2017-2022. How does the region intend to achieve the statewide level of performance when the current trend is downward?</p>	<p>Thank you for your comments. The 2-year and 4-year MAP-21 performance targets for Interstate pavement condition in the state were set by Caltrans with substantive input from the state's MPOs. These targets were based on current conditions of our highways and expected levels of pavement deterioration over the four year performance period. It is anticipated that, with SB 1 funded infrastructure preservation investments, these targets will be exceeded both at the state level and within the SCAG region.</p>

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<i>Submitted by</i>	California Department of Transportation	Submittal 0001550 Related Documents Link
0001550.05.1	1. Over the past 30 years, the SCAG region has made an unprecedented investment in transit infrastructure. Between 2007 and 2017, however, transit ridership has gone down by 19%. The projected goal of 1.6 billion transit trips in 2045, reflecting a 245% increase in transit ridership since 2015, seems rosy.2. A common perception that transit is for the underclass seems to be an element here, but it isn't addressed.	Thank you for your comment. Connect SoCal includes a comprehensive set of policies, strategies, and multi-modal services and infrastructure investments to support all modes of travel and promote a reduction in single-occupancy vehicle (SOV) travel to help the region meet its mobility and sustainability goals.
0001550.05.2	3. Calling for diligence against encroaching gentrification and good intentions regarding economic and environmental equity do not seem to have been enough so far to establish housing opportunities for all income levels. Relying upon the market forces that generated the current inequities to somehow solve them seems unrealistic. Markets prefer building housing for the higher income.4. There is a claim that you will get there from here, but the battle to provide affordable housing in Southern California is being lost, as witnessed by the tented encampments throughout the region, as well as the collapse every 20 years or so of the housing markets in the Antelope Valley, Inland Empire and the Victor Valley during recessions.	Comment noted.
0001550.05.3	5. The details on the 2020 RTP/SCS Travel demand modeling efforts in this report are scant. On page 2 of the Transportation Modeling conformity appendix, reference to the model as an Activity Based Model, and mentions that it has met federal requirements, and has been through a peer review process, but there aren't other details to assess the modeling efforts.6. Express Lanes are an important component of SCAG's planning for the highway system. The 2016 RTP assumes very high participation of 3+ Person Carpools on the Express Lane System. Those values are not realistic and give inaccurate estimates of future express lane person throughput, revenues generated and so forth. What are the values being generated in the SCAG 2020 RTP/SCS assignment model?	<p>Response to #5: Thank you for your comment. SCAG modeling staff has periodically reported on the Activity Based Model (ABM) development status to SCAG Modeling Task Force (MTF). Staff also reported on the peer review at the October 2019 MTF. (Agendas and presentations are available on SCAG Modeling Task Force website) and June 2019 Technical Working Group (TWG). The Modeling Task Force is open to the public and provides a linkage between SCAG's Regional Modeling Program and the modeling efforts of other public and private agencies. It is also used as a conduit for public outreach, giving members an opportunity to review, discuss and provide guidance over SCAG's modeling program and resolve regional technical modeling issues.</p> <p>Response to #6: Thank you for your comment. The model outputs are estimated and projected through use of a validated regional travel demand model using the latest available information. Based on SCAG Activity Based Model (ABM) for Connect SoCal, the 2016 base year currently shows lower participation of 3+ person carpool on the express lane than the 2016 RTP/SCS and the participation rate is projected to be on downward trend for the future years. The detailed data is available upon request.</p>
0001550.05.4	7. The configuration of the No Build Highway Network mostly includes projects that I expected to see. The major changes seem to lay in the land use/transportation system interface which is the appropriate, but don't appear substantive enough to generate the massive behavioral changes envisioned.	Comment noted.

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0001550.06	8.The report notes only one very general impediment to telecommuting. Specifically, it notes that some jobs are simply not amenable to telecommuting. That is true enough, but it reflects almost no examination of any specific impediments to telecommuting, nor how to overcome them. Questions of exercising oversight, handling liability issues are not addressed let alone resolved. No reference to specific financial, legal or social impediments to expanded telecommuting is mentioned. Yet, SCAG expects 9.5% of Home-Work trips to be eliminated through telecommuting.	Comment noted. As discussed in the Congestion Management Technical Report, SCAG conducted a Future of the Workplace study to inform Connect SoCal and beyond. Tasks included a comprehensive literature review on teleworking, including variants of teleworking such as telecommuting, home working, and home-based businesses. The study also analyzed all available data sources for SCAG’s modeling assumptions and provided current and future estimates of teleworking while also reviewing the linkages between telework and VMT reduction. In addition, the study sought to better understand teleworkers and the impact of emerging trends in the nature of the workplace. The study included a survey of teleworkers in the SCAG region which was conducted in order to understand characteristics not present in existing data including detailed information about travel patterns, household characteristics, work arrangements, reasons for teleworking, and how teleworking impacts choices for living and working locations. Finally, the study investigated the potential long-term impacts of structural changes in the nature of work including the potential for workplace automation and the rise of the gig economy.
0001550.07	Add an Executive Summary (that's a few pages longer than the summary on page 5)	Comment noted.
0001550.08	In light of SB 743, it seems the following percentages should be reversed:- 22.8% Decrease in time spent in traffic delay per capita- 4.2% Decrease in daily miles driven per capita	The comparative performance results reported in Connect SoCal for daily minutes of delay per capita and for daily per capita vehicle miles traveled (VMT) are generated by the SCAG Travel Demand Model using a specific set of parameters that reflect expected travel patterns in the year 2045 with full implementation of the investments, programs, and strategies outlined in Connect SoCal. While the per capita VMT reduction percentage is smaller than the figure for travel delay, when attributed to the entire population of the SCAG region of more than 19 million residents, the VMT reduction results are quite significant and represent meaningful progress toward meeting our regional GHG emission reduction goals. The effort to restrain growth in the length and duration of motor vehicle trips is a primary focus of Connect SoCal. With implementation of the VMT reduction provisions of SB 743 scheduled take effect in July of this year, we are confident that per capita VMT in the SCAG region will begin trending steadily downward, thereby contributing to our GHG reduction goals.
0001550.09	Caltrans District 7- Regional Planning Draft Connect SoCal1. Page 2, under 'Our Plan'; in this section, commend SCAG for acknowledging the continuous partnership with the State (Department of Transportation) in advocating for implementation and funding for California's Active Transportation Program, resulting in the passage of Senate Bill 1.	Thank you for your comment.
0001550.10	Page 2, SCAG identifies the region's multi-family shares declining from their peak in 2015. However, figure 2.4 illustrates 2017 as the peak year.	Thank you for your comment. Permit data come from the Construction Industry Research Board (CIRB). In 2017, combined permits for single-family and multifamily units totaled 47,623 units—the highest year since before the Great Recession and above the 2015 total of 44,870. However, both the share of multifamily permits and its total number of permits issued peaked in 2015 with 29,418 issued—a figure which decreased to 25,580 by 2017.
0001550.11	Page 32, 'Present & Future Challenges', this section identifies Technical Reports for Connect SoCal. This section should include a weblink to the Technical Reports for reference purposes.	Comment noted. SCAG will take your comments into consideration.

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0001550.12	Page 8, under 'What is Connect SoCal; in this section, the first paragraph discusses the Plan charting a path toward a more mobile sustainable and prosperous region. This section should include a visual graphic illustrating the connection between the key components.	Comment noted. SCAG will take your comments into consideration.
0001550.13	1. Page 20, SCAG identifies the two counties with the largest population growth (Riverside & Los Angeles), however this section should include the population growth throughout the SCAG region, including and identifying counties with disadvantage communities.2. Page 32, under 'Present and Future Challenges'; This section should include a weblink to the Technical Reports so interested parties can more easily see how the highlighted issues mentioned below are directly addressed by this plan.3. Page 32-33, under 'Affordable Housing'; This section brings up hurdles such as land use zoning that can make the development process expensive. Perhaps it would be beneficial to include some brief verbiage about how our region's zoning policies generally compare to other areas.	Thank you for your comment. The Environmental Justice Technical Report contains a more detailed discussion of disadvantaged communities by county. Unfortunately comparative analysis with other regions is outside the scope of this particular report; however, we encourage you to follow other SCAG research on our website and events such as the annual Demographic Workshop which provides an annual forum for discussing the SCAG region's trends in comparison with other areas.
0001550.14	Page 37, under 'Transportation Safety'; In the last sentence, it does not seem relevant or noteworthy to mention that lower speed crashes translate to a higher pedestrian survival rate. Instead, the plan should elaborate on how we can plan our transportation system in away that encourages safe speeds since it has established that 30% of collisions result in unsafe speeds. Page 38, this section identifies the historic catastrophic events data, however this section should include the effects of the catastrophic events as they correlate to transportation security.	Comment noted. In the SCAG region pedestrians account for a disproportionate number of serious injuries and fatalities compared to their overall mode share. SCAG recognizes that traffic fatalities and serious injuries increase with vehicle speed. Connect SoCal includes language and graphics to reinforce that lower vehicle speeds improve the likelihood that a pedestrian will survive if struck by a vehicle. The Transportation Safety and Security Technical Report includes a variety of strategies for reducing aggressive driving and speeding. The Technical Report also includes more detail on the impacts of catastrophic events and disasters on transportation.
0001550.15	Page 41, the paragraph regarding funding transportation would have been enhanced by having a graphic showing the existing gap between cost of transportation and available dollars.	Comment noted.
0001550.16	Page 47, this section addresses trends and emerging challenges which must be done to reduce greenhouse gas and meet target goals. Commend SCAG for incorporating this segment as part of Connect SoCal to address additional alternative approaches to address regional challenges.	Thank you for your comment. Comment noted.
0001550.17	Page 66, Table 3.1; Where can interested parties find more information on the listed Transit Capital Projects?	Thank you for your comment. Table 3.1 is a summary of major projects, while the full listing of Connect SoCal projects is included in the Project List Technical Report.
0001550.18	Page 74, this section identifies the Project List Technical Report of financially constrained and unconstrained lists of projects. This section should include a weblink to the Project List Technical Reports for accessible reference purposes.	Comment noted.

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0001550.19	Page 128, under 'VMT Per Capita'; Should verbiage be added to explain why the State is shifting towards VMT as opposed to Level of Service (LOS)? It could tie in with the promotion of in-fill development, multi-modal transportation options, etc.	In regard to the statewide shift to a VMT-based metric to replace the previously used Level of Service (LOS) metric for evaluating CEQA transportation impacts, the reasoning for the SB 743 required change in the assessment method is summarized in a subsequent paragraph in the report. Please see page 129 of the draft Performance Measures Technical Report: "Replacing the LOS methodology with a VMT-based assessment metric satisfies the SB 743 objectives of reducing GHG emissions, promoting mixed-use and infill development, and encouraging the provision of active transportation infrastructure. The new VMT-based CEQA transportation impact assessment requirement will take effect statewide on July 1, 2020, further elevating the importance of monitoring VMT at the regional and local levels."
0001550.20	Page 150, Commend SCAG for identifying a framework to continue regional partnerships. Together the efforts will address regional challenges and an attempt to meet goals thatdeem unpredictable.	Thank you for your comment. Comment noted.
<p><i>Submitted by</i> California Department of Transportation Submittal 0001551 Related Documents Link</p>		
0001551.01	1. Page 150, Commend SCAG for identifying a framework to continue regional partnerships. Together the efforts will address regional challenges and an attempt to meet goals that deem unpredictable.2. SCAG is applauded for explaining Connect SOCAL concept and its connection to the RTP and its long-range goals. SCAG also noted that cities and counties adopting the spirit of the RTP into planning measures for their areas could help their eligibility for future funding grants.3.SCAG did a great job on discussion of the myriad of components that makeup an RTP.	Comment noted. Thank you for your comment and appreciation for the Connect SoCal.
0001551.02	Suggest making the Environmental Justice/ Public Health Technical Report maps available as interactive maps for the public to view impacts in their communities as well as for comparative analysis.	Comment noted. SCAG staff will continue to work with our Environmental Justice (EJ) stakeholders to collect input and improve on our EJ analysis and be a resource to local jurisdictions and EJ stakeholders. Such improvements may include developing an interactive application with maps that can be a resource tool for local jurisdictions or other organizations.
0001551.03	We applaud SCAG for considering the importance of an aging population (65+) in the Plan; 1 out of 5 residents in the SCAG region will make up this demographic (Page 17, Connect SoCal Draft). They are more susceptible to impacts in the focus areas listed in the Public Health Technical Report than is the general population.	Thank you for your comment. This is an important change which can't be emphasized enough—I encourage you to share the Demographics and Growth Forecast Technical Report with other stakeholders, and keep an eye out for SCAG's Demographic Workshop.
0001551.04	Suggest more transparency, inclusion of sources, and studies concerning metrics such as those used to forecast "growth" regarding the job-housing balance (Page 45, EJ Technical Report) and "best practices" for time-based shopping and job accessibility (Page 58, EJ Technical Report)	The Time-Based Shopping and Job Accessibility analysis utilized SCAG's transportation modeled data. This robust model has been peer-reviewed by transportation professionals. To learn more about SCAG's transportation model, please visit the SCAG website, under Data and Tools. For the Jobs-Housing Imbalance analysis, a portion of the original sentence is missing. Corrections have been made to the referenced sentence which should read, "Although the descriptive analysis of the commuting distance of workers by income may indicate something of a spatial mismatch between low-income workers and jobs in the SCAG region, this condition is projected to improve in the future (see Table 15 of the Demographics and Growth Forecast Technical Report)."

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0001551.05	Passenger Rail: How does the Passenger Rail Report integrate CTP 2040 and the California State Rail Plan 2018 with regards to goals, policies and strategies?	The Passenger Rail Technical Report will be revised to show linkages to the California Transportation Plan (CTP) 2040 and the 2018 California State Rail Plan.
0001551.06	Transit: How does the Transit Technical Report integrate CTP 2040 and the Caltrans 2017 Statewide Transit Strategic Plan with regards to goals, policies, strategies and recommendations?	The Transit Technical Report will reference the CTP 2040 and Statewide Transit Strategic Plan.
0001551.07	Goods Movement: How does the Goods Movement Technical Report integrate CTP 2040 and the California Freight Mobility Plan with regards to goals, policies, strategies and recommendations?	<p>SCAG has worked as partner and provided significant input for both the California Transportation Plan 2040 (CTP 2040) and the California Freight Mobility Plan. CTP 2040 identifies three (3) recommendations under three (3) different policies related to goods movement. Under Policy 1 (Manage and Operate an Efficient Integrated System), CTP 2040 recommends expanding the common input assumptions between state and MPO forecasting efforts, including socio-economic data, interregional travel forecasts, goods movement/trucking, pricing policies, and other areas where data sharing will result in better and more consistent travel demand forecasts across jurisdictions. SCAG routinely shares non-proprietary data and information with Caltrans and other partners (e.g., San Pedro Bay Ports, air quality agencies, county transportation commissions, etc.) to improve planning and modeling. Under Policy 2, (Enhance Freight Mobility, Reliability, and Global Competitiveness), CTP 2040 recommends research, development, demonstration, and deployment of cost-effective technologies and operational strategies to expedite goods movement, improve safety, and reduce congestion. Connect SoCal explicitly identifies improving the efficiency of regional freight movement while mitigating environmental and community impacts through innovative and pragmatic strategies and technologies. For example, SCAG's goods movement environmental strategy specifically notes a pathway to support and facilitate the development, deployment, and commercialization of clean technologies while operating within its federal and State mandates. Under Policy 3 (Seek Sustainable and Flexible Funding to Maintain and Improve the System), CTP 2040 recommends seeking the creation of national, State, and regional dedicated funding programs for freight transportation to invest in interregional goods movement corridors. SCAG continues to work with the State and regional partners to advocate for new and dedicated funding streams for freight transportation. In addition, SCAG has worked closely with the State for the submission of discretionary federal grant applications (e.g., Infrastructure for Rebuilding America (INFRA)) and state programs like the Trade Corridor Enhancement Program (TCEP). SCAG provides direct and indirect input to the California Freight Mobility Plan (CFMP). The 2013 SCAG Comprehensive Regional Goods Movement Plan and Implementation Strategy and the SCAG 2016 RTP/SCS are directly referenced in the Draft 2020 California Freight Mobility Plan. The CFMP also relies on SCAG's "Industrial Warehousing in the SCAG Region" report and uses SCAG's definition of goods movement dependent industries. SCAG staff also provided input through informal and formal discussions and comments on the Draft 2020 CFMP. Finally, Connect SoCal provides strategies that are consistent with the Draft 2020 CFMP.</p>

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0001551.08	Aviation and Airport Ground Access: How does the Aviation and Airport Ground Access Technical Report integrate CTP 2040 and the California Aviation System Plan Policy Element 2016 with regards to goals, policies, strategies and recommendations?	Comment noted. The SCAG Aviation Program is aware of the Caltrans California Aviation System Plan (CASP), including the policy element, and is currently part of the working group for the 2020 CASP. As an evolving document, future SCAG regional transportation plan updates will further reflect the ongoing partnership with Caltrans on the CASP. Moreover, in addition to the CASP, as noted in the “Regulatory Framework” section of the Aviation and Airport Ground Access Technical Report, the Technical Report also incorporated the ground access element required by the California Code (Section 65081.1), along with guidance from the U.S. Code, Federal Aviation Administration, and U.S. Government Accountability Office.
0001551.09	Active Transportation: Caltrans applauds SCAG on its robust and comprehensive commitment to Active Transportation. Caltrans praises SCAG for its many referencing of State of California and Caltrans documents relating to active transportation. Excellent sourcing and listing of CTP 2040, California Bicycle and Pedestrian Plan, various Caltrans District Level Active Transportation Plans, Caltrans State Highway Safely Plan, Caltrans Complete Streets Element Toolbox Guidebook, etc.	Comment noted. Thank you for your support.
0001551.10	Highways and Arterials: How does the Highways and Arterials Technical Report integrate CTP 2040 and the 2015 Interregional Transportation Strategic Plan and its programmed projects in the Interregional Transportation Improvement Program (ITJP) with regards to purpose, policies and considerations?	Broad policy consistencies between the statewide plan such as the CTP 2040 are addressed in the Final Connect SoCal main document. Highway and Arterials Technical Report is intended to provide additional technical information in support of this important element of the Connect SoCal. Additionally, revisions have been made to the main document to further strengthen the consistency between statewide planning documents and Connect SoCal.
0001551.11.1	1. Page 30, The report states that Environmental Quality is measured in terms of criteria air pollutant and GHG emissions. The EPA sets NAAQS for six common criteria pollutants, however only four (transportation related) pollutants are monitored in the SCAG region. What percentage of the overall criteria air pollutants do the other two pollutants contribute? 2. In addition to criteria pollutants, the EPA identifies 9 priority air toxic compounds with mobile sources known as Mobile Source Air Toxins (MSAT). The nine priority compounds are: 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (PM), ethyl benzene, formaldehyde, naphthalene, and polycyclic organic matter (POM) which have the potential for adverse health effects. The Performance Measures technical report has no mention of these mobile source air toxins. They should be monitored and strategies for reduction of MSAT be implemented.	In addition to GHG emissions, the air quality measures used to assess the performance of Connect SoCal include reactive organic gases (ROG), carbon monoxide (CO), oxides of nitrogen (NOx), particulate matter 2.5 (PM 2.5), and particulate matter 10 (PM 10). While the other mobile source pollutants cited in your comment are relevant to public health and require careful monitoring and mitigation, they are not currently used to evaluate performance of Connect SoCal and are therefore not featured in the Performance Measures Technical Report.
0001551.11.2	3. Non-SOV mode share is included in the Environmental Quality outcome category. Would be helpful to have figures that show percent of people who have switched to this method of transport and projections for future conversions to this method and its overall impact on emissions.	Thank you for your comment. The difference between the Baseline and Connect SoCal scenario indicate the percentage of trips that shift from single occupancy vehicle (SOV). In addition, the current model outputs show an increasing trend of non-SOV mode share from 2016 to future years. The data details are available upon request.
0001551.11.3	4. Emissions are estimated using results of the SCAG RTDM which are then inputted to the California Air Resources Board (ARB) Emission Factors (EMFAC) model. Information on the accuracy, precision, and uncertainty values of the model would be helpful.	Thank you for your comment. The SCAG Regional Travel Demand Model is calibrated and validated to observed regional travel patterns. The model’s parameters are adjusted until the outputs fall within recommended validation thresholds. Staff also tested the model’s sensitivity and predictive capability before it is used to produce forecasts. Please refer to ARB for more information on the EMFAC model.

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0001551.11.4	5. Page 31 Differentiate between tropospheric ozone (ground/surface-level) which can have adverse health impacts on the community versus stratospheric ozone.6. Clearly define "reactive organic gases (ROG)" and identify which ones are the largest contributors to the formation of surface ozone levels in the SCAG area. Which reactive organic gases are being monitored?	We will add "ground-level" before "ozone" on page 31 of the Performance Measures Technical Report. Regarding your request that more detailed information be provided on specific reactive organic gases (ROG), to maintain its focus, the Performance Measures Technical Report is not intended to provide this level of technical detail on air quality.
0001551.11.5	7.Ozone concentrations can reach unhealthy levels when the weather is hot and sunny with little or no wind. Tropospheric ozone formation is sunlight/temperature dependent. Report could use information on the effects that future climate change (possible increase in temperature) will have on tropospheric ozone production rates up to the year 2035. It is not clear if this change has been considered when running prediction models.	Our regional emission analysis is based on the California Air resources Board (ARB) Emission Factors (EMFAC) model. All emission rates (also referred to emission factors) from the EMFAC model are typically measured at standard temperature and humidity using typical vehicle driving and operational patterns. Please refer to ARB for more information on the EMFAC model.
0001551.12	8. Page 31 -Table 10, (SB 375) regional targets were updated by the Air Resources Board in 2018 to ensure consistency with the more stringent statewide reduction goals subsequently introduced by the California legislature and the Governor's office.9. SB 375 Regional Plan Climate Targets through Sept. 20, 2018 for 2020 were -8%, that goal remained the same after the more stringent goals were introduced beginning Oct. 1, 2018. Was this goal met? If so, what strategies were successful in reaching this goal?10. However, for the 2035 goal, the goal before Oct. 1, 2018 was -13% and was changed to -19%. The newly adjusted goal has been made significantly higher. How has this affected planning to meet the 2035 goal now that it has been changed substantially? Is it feasible?11. Page 32, What criteria and associated weights are used in the SCAG Scenario Planning Model (SPM)?12. There is mention that for Connect SoCal. The scenario modeling capabilities have been enhanced. By what methods and criteria?	Regarding progress being made in the SCAG region toward achieving our eight percent GHG reduction goal for 2020, the results of analyses conducted by SCAG indicate that this performance target has been achieved. Along with the introduction of cleaner motor vehicle technologies and improved fuel efficiencies, some of the key strategies that have proven effective toward helping us reach our 2020 GHG reduction goal have been a regional focus on infill and transit oriented development, promotion of active transportation options, and support for a variety of local and regional transportation demand management strategies. As for achievement of the 2035 GHG reduction target of 19 percent, SCAG has made a commitment to substantial GHG reduction through the plans, projects, and programs included in Connect SoCal. While the reduction goal is very ambitious and presents significant challenges for our region, we believe attainment of the target is feasible if we continue to work closely with our local partners on implementing Connect SoCal and on developing VMT reduction and climate resiliency programs and strategies at the local and regional levels. In regard to the SCAG Scenario Planning Model, a new module has been developed in support of land conservation monitoring. Additionally, the public health module has been enhanced to provide access to new data resources.
0001551.13	Transportation Conformity Analysis Technical Report1. Page 3, State Implementation Plans (SIPs)- Connect SoCal must conform to the applicable SIPs [motor vehicle emissions budgets (for all criteria pollutant SIP's) and TCM's (for ozone and CO SIP's only)] in the SCAG region.2. Page 4, Federal Clean Air Act Designations in the SCAG Region - Differentiate between tropospheric and stratospheric ozone formation.3. Address the differences and severity between PM 10 and PM 2.5 health risks.4. It is crucial to provide information about the atmospheric lifetime of the criteria pollutants. Pollutants with long atmospheric lifetimes can survive in the environment for years which can greatly impact modeling efforts.5. Page 28- end, Tables with ROG- Define Reactive Organic Gases/clarify if they are using the ARB definition along with its exemptions. (ROG usually means any compound of carbon) however the ARB has listed exemptions to ROG which would not be included in emission measurements. Alternatively, specify what compounds are being tested for/monitored and shown in the table under ROG.	1. Clarification has been added to the end of the first sentence under "Federal Transportation Conformity Regulations" on page 4.2. Clarification ("Ground-level") has been added before "Ozone" under "Applicable Criteria Air Pollutants in the SCAG Region" on page 4.3. Clarification ("Of these, particles 2.5 micrometers or less in diameter, also known as fine particles or PM2.5, pose the greatest risk to health.") has been added at the end of the bullet "Particulate Matters (PM2.5 and PM10)" under "Applicable Criteria Air Pollutants in the SCAG Region" on page 4.4. Comments noted. The suggested information is not immediately relevant to SCAG's transportation conformity analysis because SCAG is required to use the emission factors (EMFAC) model developed by the California Air Resources Board.5. Comments noted. The ROG emissions are output of the EMFAC model developed by California Air Resources Board (ARB). Therefore, the use of ARB definition is implied and no clarification is needed.

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0001551.14	<p>Goods Movement Technical Report.1. Currently, much of the SCAG region fails to meet federal ozone and fine particulate air quality standards as mandated by the federal Clean Air Act.2. Although zero-emissions vehicles seem to be the goal, the discussion on near-term improvements that can be implemented sooner. and at a cheaper cost is appreciated. Zero-emission vehicles for goods movement are still at an early stage and require a lot of money for implementation including the planning and building of new infrastructure to support the energy needs of these technologies.3. It is important to explore other emission reduction strategies that can be implemented right away with relatively lower costs. (e.g. improvements to engine efficiency. Increase efficiency in internal combustion engines through engine technologies such as waste heat recovery which lowers fuel use).</p>	<p>SCAG agrees. Near term options to improve efficiency are discussed in the Goods Movement Appendix 1 under Combustion Engine and Aerodynamic Improvements.</p>
0001551.15	<p>Page 54 - Livable Corridors Section:1.This section focuses on BRT options to qualify an area as a "livable corridor", but consideration should also be given to rail corridors as well. 2.There is no mention of landscaping, green scaping, shade trees or bioswales as a viable improvement for a livable corridor. These types of improvements can also help slow down traffic and improve the conditions for other street users.</p>	<p>1) Rail corridors are reflected in Transit Priority Areas. 2) These strategies are reflected in the Urban Greening section and are applicable not just to Livable Corridors but also to other Priority Growth Areas.</p>
0001551.16	<p>Page 69-70- Active Transportation Section:1.It would be helpful if the active transportation improvements section included more specific improvements (like the Transit Improvements section). Improvements to pedestrian facilities are important and should be noted. 2.There were many community concerns regarding the Venice Boulevard Great Streets project. We suggest using a much more successful example of a Great Street in this section.3.More funding opportunities should be provided for community-based organizations to be "partners" or "co-leaders" with agencies to help ensure the community's active transportation needs will be met.</p>	<p>1. Detailed Active Transportation Strategies are listed in the Active Transportation Technical Report. The narrative in the main book gives an overall look at the regional needs and high-level strategies to meet those needs. 2. While some members of the local community remain opposed to the Venice Great Streets project, the city's evaluation reports indicate that the project resulted in improved safety outcomes.3. SCAG is committed to finding opportunities to work with community-based organizations and co-design early in the planning and development process.</p>

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0001551.17	<p>Active Transportation Technical Report1. The terminology used in this technical report is not well explained or defined; please consider providing a Lexicon.2. We recommend providing more details on "green streets" and the value these offer towards a more sustainable future.3. Page 56 -Safety: The current safety goal (reduce traffic fatalities for all modes by three percent and serious injuries by 1.5 percent by 2050) is extremely conservative relative to the widespread adoption of 'Vision Zero" at many federal, state and local agencies to reduce fatalities and serious injuries to zero.4. Page 59 - Pedestrian Infrastructure: Consider adding "reducing driveway conflicts" as part of Strategy 1 or 3 to reduce potential conflicts between pedestrians and drivers.5. Page 59- Local Bikeway Infrastructure: Specify the types of "low-stress protected bikeway networks" facilities described in Strategy 1 that are preferred (e.g., Class I, II, III, or IV)6. Page 60 - First-Last Mile Infrastructure I SRTS Infrastructure: All policies should include an equity strategy to ensure future investments are going towards improving previously disinvested communities to increase safety for vulnerable road users.7. Page 64 - Safety Strategies: Consider historically disproportionate impact that increased enforcement/ policing has had on low-income communities of color in Safety Strategy 3 and Strategy 7. Enforcement should be tempered with appropriate, ongoing public engagement to avoid potential alienation and discrimination in these communities.</p>	<p>Thank you for your comment. 1. Every effort has been made to use non-technical language and to define in-text where necessary. Please refer to Connect SoCal Glossary for additional definitions. 2. "Green Street" language has been replaced with more descriptive language about stormwater capture and shade to reduce reliance on terminology for increased legibility. 3. SCAG's annual safety targets are consistent with and supportive of the California Department of Transportation's (Caltrans') Towards Zero Deaths (TZD) safety targets. Because the targets are updated annually, SCAG has the opportunity to revisit and update its targets each calendar year. To motivate serious injury and fatality reductions, SCAG has developed a High Injury Network (HIN) to help local jurisdictions focus improvements where they are most needed. In addition, SCAG offers local jurisdictions opportunities to secure regional safety planning grants (funding Vision Zero Action Plans); it convenes a quarterly Safety Working Group and periodic peer exchanges to facilitate information sharing; it implements a regional safety community outreach and advertising campaign, Go Human; and the long-range plan, Connect SoCal, provides a framework, largely grounded in the State's Strategic Highway Safety Plan, that can help agencies interested in pursuing safety initiatives and strategies at the local level. 4. Language has been added to the Pedestrian Infrastructure section regarding conflict zones.5. Preferred classification has been added. 6. The Environmental Justice Strategy 3 addresses the need to allocate resources in consideration of historical inequities. 7. Language will be added to Safety Strategies 3 and 7 to address the historically disproportionate impact that increased enforcement/ policing has had on low-income communities of color.</p>
0001551.18	<p>Caltrans District 7 -Division of Design1. The plan "sounds good" and at the same time very unrealistic.2.The same with all past Plans, this Mobility Plan promises to "fix" the current challenges ... With No Accountability, only to repeat in the next one while consuming Billions of tax dollars, which is very good for the economy.</p>	<p>Comment noted.</p>
0001551.19	<p>Assume reduction in car usages and VMTs, mainly thru 'Transit Integration". While in the past 10 to 12 years Transit Ridership has been decreasing in the region and nationwide.</p>	<p>The reduction of vehicle miles traveled (VMT) and related per capita greenhouse gas (GHG) emission anticipated from implementing Connect SoCal is not dependent mainly on transit ridership. See GHG Reduction Approach in the Sustainable Communities Strategy Technical Report for more information.</p>
0001551.20	<p>The use of this Plan/Strategy's numbers will hide/lessen the impacts of Goods Movements mobility projects, Tolling Lanes with assumed future Demand, etc., and boasts the assumed benefits identified below (Region's assumptions). See Regions unsupported/overestimated assumptions below (pushed as future "facts" .) -SCAG's region projected 19%, or 3. 7 Million population increase in the Region over the next 25 years. This projection is likely to be low, if California's economy maintains its strength.- According LA based Beacon Economics in the next 30 years, LA County would increase by 3.5 million and Riverside County will increase - 3.2 million.https://www.reuters.com/article/us-california-population/californias-population-to-hit- 60-million-by-2050-id USN0930091220070709</p>	<p>The regional growth forecast reflects recent and past trends, key demographic and economic assumptions, and local, regional, state, and national policy in order to present a balanced view of population, household, and employment growth to 2045. Population forecasts from the California Department of Finance and the US Census Bureau are used as references for developing these forecasts. Importantly, SCAG's regional growth forecasting process also emphasizes the participation of local jurisdictions and other stakeholders. Beginning in 2017, SCAG began a rigorous effort to prepare population forecasts for Connect SoCal. The process included an expert review, local input from regional jurisdictions (including through one-on-one meetings with all 197 jurisdictions). For more information on the SCAG forecast methodology, please refer to the Final Demographics and Growth Forecast Technical Report.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001552 Related Documents Link
0001552.01	<p>MODE SHIFT: The assumptions are based to a large degree upon the extent to which major mode shifts within the region can be accomplished. No reasonable and/or quantifiable data provided on that insures these shifts are highly probable to materialize, especially as transit ridership has been steadily declining in the past 12 years nationwide and throughout Southern California. With Technology leaps,driverless car sharing options are likely to lead to increases in vehicle miles traveled (VMT).</p>	<p>Thank you for your comment. Connect SoCal includes a comprehensive set of policies, strategies, and multi-modal services and infrastructure investments to support all modes of travel and promote a reduction in single-occupancy vehicle (SOV) travel to help the region meet its mobility and sustainability goals. The outcomes are projected through use of a validated regional activity-based model using the latest available information.</p>
0001552.02	<p>HIGH OCCUPANCY VEHICLE (HOV) AND TOLLING LANES: It is crucial to transparently address Inequity issues (Title VI, etc.), address the true Corridors' mobilities prior to regional policies to increase the number of persons needed to ride for free in Tolling lanes. Needcomprehensive and transparent impacts assessment on traffic congestion and on people impacted by these changes. Currently designed Tolling "Express" Lanes policy papers is skewed towards Tolling ("drives" the operational assessment). The operations should bebased on, at a minimum, evaluating all freeway lanes together (included tolling). To be transparent, the operational analysis should address the Corridor (to include parallel arterials/local streets impacts).A recent example from Metro's 1-105, EA 314500 PAED docs., Convert HOV lane and add a lane (for a 2- Tolling Lanes): The 2016 SCAG RTP/Sustainable Communities Strategy (scenarios include: Transit Integration, Livable Corridors, "Neighborhood Mobility Area"- walking/bicycling, Bike and car sharing, etc.). The Travel Demand Model year (2047) shows 17.2% trip reduction (traffic #slower than current counts). Metro/" PDT" said this was not a realistic forecast and implemented a strategy that translates into higher vehicle on the 1-105 GP and Tolling lanes). Metro selected to use year (2027) TOM projections/congested #s, project opening year, and held these #sconstant thru year (2047)! This Strategy justifies implementing the Tolling Project. At the same time to reduce the schedule and cost, it was argued that the Fwy Traffic Noise impacts would be much lower with reduced traffic demand, therefore no need to construct sound walls.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001552 Related Documents Link
0001552.03	<p>Caltrans District 8 Thank you for the opportunity to review Connect SOCAL the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. We found the overall document to be generally well written, visually interesting to read and provided the results and finding on an array of regional planning issues from a lot of work that clearly took years of sustained, focused, directed effort. It is our understanding that the United States currently faces a housing shortage in excess of some 7 million dwelling units. Of that 7 million+ dwelling unit shortage some 3.5 million units of the shortfall exists here in California. Beyond homelessness and increased use of limited existing square footage in our existing housing supply, the unprecedented housing shortage has created a range of social equity issues (lack of personal financial independence, homeownership etc.). Since some 73 percent of Californians live in Southern California, the housing shortage is an extremely important issue with a range of impacts on the transportation system. The 2012 RHNA indicate a need for 412,000 new housing units. The 2018 RHNA indicates a need for some 1,340,000 million new housing units in Southern California. The draft Connect SOCAL document doesn't seem to indicate what the extent of this worsening crisis is here in Southern California. As noted in the summary of Connect SOCAL the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, the current severe housing shortage creates jobs/ housing balance issues and the need for longer commutes and increased congestion on the overall transportation system. On Pages 48-56 under the heading Sustainable Communities Strategies and Housing Supportive Infrastructure Connect SOCAL discusses sustainable development practices such as Center Focused Placemaking, Priority Growth Areas, Job Centers Transit Priority Areas, High Quality Transit Areas and Neighborhood Mobility Areas and discusses the housing crisis but provides little indication that the types of desired development listed above is happening on a large scale in the region.</p>	<p>Comment noted. Please see Table 2.1 in Chapter 2 of the plan which indicates that the majority of growth and development in recent years has been occurring in the Priority Growth Areas.</p>
0001552.04	<p>Page 49 included a short list of ways Diverse Housing Choices could be encouraged. We commented in bold below on these strategies and recommended additional strategies related to housing and transportation caused by longer commutes and increased congestion caused by new housing. 1) Preserve and rehabilitate housing and prevent displacement. Wouldn't preservation/rehabilitation occur due to supply and demand? Is displacement good if higher density is proposed? 2) Identify opportunities for new workforce and affordable housing development. Not really clear what this means? Do you mean Affordable housing for new members of the workforce? 3) Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply. Would this be expected to create hundreds of thousands of new units? 4) Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions. List ways to do this.</p>	<p>Comments noted. 1) Connect SoCal strategies seek to bolster housing preservation and rehabilitation and increase choices, with emphasis placed on affordable housing stock retention. Moreover, Connect SoCal seeks to minimize equity and justice impacts associated with displacement. 2) Workforce and affordable housing is typically defined relative to Area Median Income (AMI) with affordable housing for households with incomes 80% or below AMI and workforce being for households with incomes of 80-180% of AMI. The specific income and affordability requirements is project specific and this is outlined as a general reference. 3) The recent passage of Senate Bill 1069 in 2016 has resulted in several thousand permits for accessory dwelling units issued across the region but it is too soon to estimate the extent of this trend. 4) There are many potential solutions and strategies for supporting the development of more housing in the region. Those included in the plan are general to the region but not exhaustive.</p>

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<i>Submitted by</i>	California Department of Transportation	Submittal 0001552 Related Documents Link
0001552.05	<p>Suggest policy support and reworking the Diverse Housing Choices section of the plan to include support of ideas like the following:Support and reference The Ahwahnee Principles. https://www.lgc.org/who-weare/ahwahnee/principles/Support long lasting smart mobility decisions that improve the environment, create a vibrant economy and build communities not sprawl.Support redevelopment of high density residential along transit served corridors.Support having new housing be originally built with an accessory dwelling unit.Support an overall trend to reduce of lot size minimums in the region by 20%.Support the concept of building to the maximum density allowed in a residential zoning district rather to the minimum density.Support a policy that wherever possible in all new specific plans placement of high density housing residential shall occur near planned schools, employment and retail areas.Support a regional mode shift to walking and bicycling https://dot.ca.gov/-/media/dotmedia/proqrams/sustainability/documents/caltrans-strateqic-mqmt-plan-033015-a 11 y.pdfSupport the provision of designated areas for employment (beyond a few retail commercial and school sites) in all new specific plans.Support the provision of connected street grid system by limiting cul-de-sac length to no more than 250 feet.Support minimizing the size of a block, through the use of a block size maximum of 1,600 feet.Support bike and pedestrian through block connectivity through subdivisions by providing one such connection every 600 feet.Support allowing 100 percent housing on vacant or abandoned property zoned for commercial retail use to help the viability of existing commercial uses (25 solutions article below).Support local jurisdictions efforts to provide a temporary 30% reduction on all residential impact fees for (3 -5 years) to encourage housing production.Support housing policy that provides net zero energy use that would build on the 1 million solar homes California has with a goal of greatly increasing this total (roughly 12.5 million dwelling units exist with a need for 3.5 million more dwelling units)Support allowing a reduction in setback standards to Uniform Building Code minimums on side yards and limit front and rear yard setbacks to no more than 10 feet.Support the elimination for any required covered off street parking to support development of more housing units.</p>	<p>Thank you for your suggestions. There are many potential solutions and strategies for supporting the development of more housing in the region. Those included in Connect SoCal are general to the region but not exhaustive. While the Connect SoCal does not propose a regional mode shift goal, the outcomes of the plan show a positive regional mode shift for both walking and bicycling. The Active Transportation Technical Report includes strategies to develop complete pedestrian and bicycle infrastructure networks, but does not specify block connectivity as a strategy. However, the Active Transportation Technical Report does highlight excessive distances between safe crossings as a concern to be addressed.</p>
0001552.06	<p>Support development of high density housing in unused portions of commercial shopping centers/office etc. parking lot areas.Support allowing a reduction in local public street width standards and/or to allow reduced width private streets to encourage infill development.Support increasing residential building height standards in residential zoning districts to allow greater building square footage.Support any regional efforts to develop the missing middle housing of the past few decades.https://missingmiddlehousing.com/</p>	<p>There are many potential solutions and strategies for supporting the development of more housing in the region. Those included in Connect SoCal are general to the region but not exhaustive.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001552 Related Documents Link
0001552.07	<p>In the Measuring our Progress portion of Connect SOCAL Pages 118-147 it seems reasonable to assume that much of the "progress" in congestion relief and other areas has to do with 91 ,000 people per year leaving the SCAG region due to the high cost of housing and other reasons since 2014 as noted on Page 16 of Connect SOCAL discussion on mega trends. Is this real progress or an abandonment trend that needs to be reversed?https://www.worldpropertyjournal.com/real-estate-news/united-states/washington-dc-real-estateneeds/up-for-growth-national-coalition-econorthwest-holland-government-affairs-housingunderproduction-in-the-us-2018-housing-shortage-data-10842.phphttps://www.curbed.com/2019/5/15/18617763/affordable-housing-policy-rent-real-estateapartmenthttps://ucreeconomicforecast.org/wpcontent/uploads/2019/04/SCAG_Housing_White_Paper_Digital_4_11_2019_Revise.pdfhttps://urbanize.la/posU25-solutions-builder%E2%80%99s-perspective-fix-california-housingcrisis</p>	<p>In response to your inquiry regarding recent trends of domestic out-migration affecting the SCAG region, while it is true the region continues to lose population to other states, the total population in the SCAG region continues to grow on an annual basis as a result of strong international migration and net natural increase. For this reason, it is unlikely that domestic out migration to other states has had a significant impact on levels of traffic congestion in the region.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001552 Related Documents Link
0001552.08	<p>Caltrans District 11 Draft Connect SoCal. Truck Parking/Truck driver shortage: Please address and include truck parking needs in the SCAG region. In addition, the shortage of truck drivers is commonly cited as the number one problem in the trucking industry.</p> <p>2. Freight Projects List: Please include transportation projects that have been identified in the 2014 California-Baja California Border Master Plan and the Draft 2020 California Freight Mobility Plan. Examples of projects that are missing in the Goods Movement Project List are: Forrester Road, Commercial Vehicle Inspection Facility modernization project at Calexico East Port of Entry (POE), bridge and highway realignment to Andrade POE, widen State Route 98 (SR-98) between Dogwood Road and V.V. Williams Ave., widen SR-98 between Ollie Ave. and Rockwood Dr., widen Menvielle Road to four lanes from Carr Road to SR-98, implement Border Wait Times System, and modernize existing truck parking/staging areas for near-zero to zero emission infrastructure truck shore power.</p> <p>3. National Freight Highway Network (NFHN): Please include and identify routes that have been designated as Critical Urban Freight Corridors and Critical Rural Freight Corridors. These are public roads in urbanized and rural areas which provide access and connection to the Primary Highway Freight System and the Interstate with other ports, public transportation facilities, or other intermodal transportation facilities.</p> <p>4. California Sustainable Freight Action Plan (CSFAP): Please describe how the RTP supports the goals and vision of the CSFAP. This State plan provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. Please include the Advanced Technology Corridors at Border POEs CSFAP pilot project as part of the RTP Goods Movement Environmental Conditions and Technology Advancement Strategies.</p> <p>5. Agriculture and Mining: Little is discussed regarding needs and availability of producing agricultural and mining (e.g., aggregate) commodities among border or rural areas of the region (Imperial and Coachella Valleys, Ventura, etc.). Safety, maintenance and asset management (e.g., State Highway Operation and Protection Program [SHOPP]) needs could be mentioned on lower-volume/seasonal routes impacted by heavy machinery movements/emissions.</p>	<p>1. Growth in truck traffic will demand increased locations for safe, secure, and accessible parking facilities. SCAG is currently working on efforts to understand these truck parking needs, including creating an inventory of existing facilities and participating in a multi-state effort considering truck parking solutions along I-15. SCAG will continue to explore and expand efforts related to truck parking concerns. However, while the idea of truck driver shortages is commonly cited, recent analysis from the U.S. Bureau of Labor statistics indicates that there has not been a shortage in the number of people willing to work as truck drivers. Instead, the market for truck drivers is similar to that of other blue-collar professions as evidenced by driver pay rising at commensurate rates. The American Trucking Association (ATA) notes that high turnover at many trucking companies is due to drivers moving from among carriers. If there were significant shortages of drivers, wages would increase and subsequently result in a rise in the cost of truck transportation services. Recent increases in cost have mainly resulted from greater fuel costs. Finally, when shortages are cited, it mostly refers to a deficit for long-haul routes. While that is an important component of the trucking labor force in the SCAG region, it fails to adequately also capture local delivery drivers and short-haul drayage drivers.</p> <p>2. With the exception of the bridge and highway realignment to Andrade POE, these projects have been added.</p> <p>3. A map of the NFHN has been added.</p> <p>4. SCAG supports the goals of the California Sustainable Freight Action Plan (CSFAP) for an efficient and economically competitive zero or near zero emission freight system. Connect SoCal identifies its dedication improving the efficiency of regional freight movement while mitigating environmental and community impacts through innovative and pragmatic strategies and technologies. For example, SCAG's goods movement environmental strategy notes a pathway to support and facilitate the development, deployment, and commercialization of clean technologies. Our commitment to these objectives is also stated in the vision statement for the regional goods movement system. The Advanced Technology Corridors at Border POEs is an integrated IT solution to reduce traffic and therefore emissions. As it is not uniquely an air quality strategy, it is better discussed in the section entitled International POE Strategies and a brief reference to this has been added.</p> <p>5. While mining and agriculture are important regional industries, particularly in Imperial and Ventura Counties, SCAG does not include them in its analysis of "goods movement dependent industries" as their contribution to regional Gross Regional Product (GRP) and regional employment constitute less than 1 percent to each. Connect SoCal focuses primarily on the five largest non-service industries in the region as they have direct and disproportionate linkages to the movement of goods in Southern California. These industries are manufacturing, construction, retail, wholesale trade, and transportation and warehousing. However, SCAG recognizes the role that agriculture plays in the region and will continue to explore strategies and efforts to improve the efficiency of freight movement for both mining and agriculture needs.</p>

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<i>Submitted by</i>	California Department of Transportation	Submittal 0001552 Related Documents Link
0001552.09	Highways and Arterials Technical Report Page 8 references SB1 in the context of performance measures and Page 14 mentions the Proposition 1 B Corridor Mobility Improvement Account (CMIA) requirements for Corridor System Management Plans (CSMP) and components of those documents. SB1s requirement of corridor plans is not addressed nor are the competitive programs such as Solutions for Congested Corridors Program (SCCP), Trade Corridor Enhancement Program (TCEP) and Local Partnerships. Although not impactful for the California Environmental Quality Act (CEQA), the discussion is important for future funding opportunities and possible planning efforts.	Comment noted. Appropriate changes have been made in the Final Connect SoCal.
0001552.10	Page 10, Transportation Safety & Security: Table 3- Is Fatality and Injury prediction table approved by Caltrans?	The Transportation Safety and Security Technical Report's Table 3, Forecasted Reductions, reflects the regional and statewide safety targets that were approved for calendar year 2019.
0001552.11	1. Table 1 - FTIP Projects- FTIP ID Number IMP140804: Route should be "8", not "999".2. Table 2- Project Number IMP0042A: The Derno funds identified for this project have been repurposed to a different phase for SR98. As such, this project should be removed.3. Additional project: Please add: SR186 All American Canal Bridge- Replace bridge to accommodate two vehicle lanes, shoulders and pedestrian/bicyclist facilities. Cost \$40M; Construction Year 2027.	Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Please work with ICTC to incorporate the modifications into the FTIP and/or RTP through the next amendment.
0001552.12	Transit: There are no comments related to any specific projects; however, the District would like to recommend that consideration be given to include bicycle and pedestrian facility connections and protection by enhancing visibility of bicyclists and pedestrians as well as to provide wayfinding signage to guide the active transportation population to facilities to help them complete their trip.	Thank you for your comment. Additional discussion regarding Active Transportation strategies such as wayfinding and first/last mile connectivity is included in the Active Transportation Technical Report.
0001552.13	Caltrans District 12 Draft Connect SoCal -The Draft Connect SoCal Plan provides long term guidelines and strategies for the SCAG region. These guidelines and strategies should align with State goals as laid out in State planning documents such as the California Transportation Plan (CTP), California State Rail Plan, California Freight Mobility Plan (CFMP), California Aviation System Plan (GASP), and State Bicycle and Pedestrian Plan. As stated in our previous comment letter during the Notice of Preparation (NOP) process, dated February 22, 2019, we encourage the incorporation of State planning documents to align the 2020-2045 RTP/SCS with Stategoals.	Thank you for your comment. Appropriate edits will be made to the reflect alignment with goals laid out in the California Transportation Plan (CTP), California State Rail Plan, California Freight Mobility Plan (CFMP), California Aviation System Plan (GASP), and State Bicycle and Pedestrian Plan in the Final Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001552 Related Documents Link
0001552.14	<p>The SCAG region has many highly urbanized areas that have increasing traffic demand due to population growth and economic development and have limited available Right-of-Way (ROW) for transportation purposes. To enhance the operability of current facilities, strategies such as Managed Lanes would provide efficient usage of current capacity, improve travel times, reduce vehicle miles traveled (VMT), provide alternative means of transportation and may provide revenue for other transportation improvements. These strategies are consistent with state, regional and local goals and objectives. As stated in comment 10 of our previous comment letter, the Department requests SCAG review and incorporate the Orange County Managed Lanes Feasibility Study (MLFS) and the Orange County Managed Lanes Network Study (MLNS) in the 2020-2045 RTP/SCS. The recommendations from these studies have not been included in the 2020-2045 RTP/SCS. These studies and the proposed projects, including District 12's 1-5 Managed Lanes Project, reflect SCAG's Goals and Guiding Principles found on pages 9 and 10 by placing a high priority on improving mobility and reliability. The Department requests that District 12's 1-5 Managed Lanes Project, for the project approval and environmental document (PA/ED) component, be included in the final 2020-2045 RTP/SCS and also amended to the 2019 FTIP, per our October 2019 request to Orange County Transportation Authority (OCTA).</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>
0001552.15	<p>Climate change impacts have become a major concern for planning agencies at all levels. As required by California Senate Bill 379, many regional and local planning agencies have started developing plans to address climate change issues. While the 2020-2045 RTP/SCS includes climate change considerations in multiple sections of the document, it should incorporate climate change plans from other agencies into the document. Further clarification should also be provided to establish which plans supersede. As requested in our previous comment letter, please review the Vulnerability Assessment for Orange County and coordinate with Caltrans for future implementation.</p>	<p>Comment noted. Currently SCAG is finalizing its Regional Climate Adaptation Framework, which will include a Regional Gap Analysis report that identifies regional and local examples of climate adaptation and resilience efforts, as well as implementation gaps. For instance, not all critical infrastructure (e.g. hospitals, power facilities, schools, sewer plants, etc.) have completed or implemented adaptation plans to protect facilities from the effects of climate change. To support this work, SCAG convenes stakeholders via a Climate Adaptation and Resilience Working Group. SCAG anticipates sharing climate adaptation-related tools and toolkits with stakeholders in the summer 2020. This current work will inform SCAG's future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, which can incorporate climate change plans from other agencies, in the next RTP/SCS.</p>
0001552.16	<p>Caltrans District 12 appreciates the robust and thorough discussion in the RTP's Active Transportation Technical Report and supports SCAG's efforts in encouraging Complete Streets. This technical report aligns with Caltrans' goals and objectives. Complete Streets infrastructure benefits all roadway users and promotes mobility, equity, accessibility and regional connectivity, all while decreasing congestion and improving air quality.</p>	<p>Thank you for your comments and support.</p>

ID	Comment	Response
<p data-bbox="86 115 222 142"><i>Submitted by</i></p> <p data-bbox="254 110 877 147">California Department of Transportation</p> <p data-bbox="1167 115 1409 142">Submittal 0001552</p> <p data-bbox="1629 115 1902 142">Related Documents Link</p>		
0001552.17	<p data-bbox="260 173 1146 695">Active Transportation Technical ReportThe following areas of the Active Transportation technical report that accompany the 2020-2045 RTP/SCS require consideration for revision:1. Page 3, first paragraph: under Section "Defining Active Transportation", add walking as partof the examples.2. Page 3, paragraph eight: consider making a distinction between traditional active transportation modes and micro-mobility modes.3. Page 5, Table 1 second row, second column: consider adding increased connectivity as part of the impacts.4. Page 7, paragraph eight: under Regional Significance consider discussing ADA-friendly infrastructure in one of the subsections. Active Transportation infrastructure also benefits ADA-reliant users by increasing these users' mobility and accessibility.5. Page 19, paragraph 4: verify the list of cities that currently have bike share programs. Some of the cities listed may no longer have these programs available. For example, the cities of Bellflower and Paramount had a partnership with dockless bikeshare company Ofo in 2017. However, Ofo has since backed out of the United States market.6. Page 79 and 85, Bicycle Master Plans, and Pedestrian Master Plans: the City of Irvine is currently developing an Active Transportation Plan and the City of Santa Ana has recently finalized its Active Transportation Plan. Additionally, the Orange County Transportation Authority has bikeway studies on four sub-areas of Orange County--North, West/Central, South and Foothills.</p>	<p data-bbox="1167 173 1965 315">Thank you for your comment. 1. Walking has been added as an example. 2. Active transportation modes are defined throughout this section with a specific, separate reference to micro-mobility. 3. Language has been added to Table 5.4. Inclusive infrastructure design concepts are included throughout the Technical Report, with specific ADA-related strategies outlined in the Implementation Strategies Section.</p> <p data-bbox="1167 347 2018 695">5.The Local Input Survey section of this Technical Report contains information SCAG receives directly from our member jurisdictions. While we understand bike share and other micro-mobility programs may shift due to a variety of factors, SCAG provides a baseline assessment of micro-mobility across the region through our local input survey and direct outreach to cities. Language has been added to this Technical Report to specify a baseline year at which this information was gathered and noted this information is subject to change. Language has also been added to clarify that while cities and jurisdictions may not have a bike share program or micro-mobility available in their jurisdiction at present, our analysis for modeling future micro-mobility access across the region does not preclude jurisdictions from potentially having these modes available at a later date. 6. Updates will be reflected in the Active Transportation Technical Report.</p>
0001552.18	<p data-bbox="260 719 1129 773">7. Page 98, second paragraph and page 99 Exhibit 13: clarify that the City's protected bike lane along Bristol Street is a class IV facility and incorporate it into Exhibit 13.</p>	<p data-bbox="1167 719 1976 773">Thank you for your comment. The Active Transportation Technical Report has been updated to reflect proposed changes.</p>
0001552.19	<p data-bbox="260 800 1104 967">Southern California ports are seeing increased demand as trade with the Pacific Region continues to grow. SCAG should continue to plan for increased truck traffic within the region. Additionally, consider a discussion of the lack of available safe, secure and accessibleparking for long distance freight vehicles. Projected growth of truck traffic and the demand for truck parking will continue to outpace the supply of public and private parking facilities.</p>	<p data-bbox="1167 800 2018 1084">Trucks carry the largest fraction of goods moved, both in terms of ton-miles and cargo value, of all of the goods movement modes. Truck traffic in the region is expected to grow at a very high rate, much higher than auto traffic, and will use an increasing share of the region's highway facilities. Connect SoCal includes a number of projects and strategies designed to address the impacts of this growing traffic. As noted, this growth in truck traffic will also demand increased locations for safe, secure, and accessible parking facilities. SCAG is currently working on efforts to understand these truck parking needs, including creating an inventory of existing facilities and participating in a multi-state effort considering truck parking solutions along I-15. SCAG will continue to explore and expand efforts related to truck parking concerns.</p>
0001552.20	<p data-bbox="260 1114 1136 1252">Due to the high number of residential developments, related functions such as micro-transit and micro-freight, need to be analyzed. Optimizing curb space locations and micro-freight and micro-transit routes may reduce congestion, VMT, and wait times for users. Additional multi-modal transportation options such as bus rapid transit and parallel light rail provide alternative options for travelers.</p>	<p data-bbox="1167 1114 1986 1167">Thank you for your comment. Connect SoCal identifies the importance of curb space management and the need to optimize use of the public right-of-way for all users.</p>
<p data-bbox="86 1284 222 1312"><i>Submitted by</i></p> <p data-bbox="254 1279 877 1317">California Department of Transportation</p> <p data-bbox="1167 1284 1409 1312">Submittal 0001553</p> <p data-bbox="1629 1284 1902 1312">Related Documents Link</p>		
0001553.01	<p data-bbox="260 1346 1136 1479">The Department supports SCAG's efforts to create an integrated transit payment system, discussed in the Shared Mobility and Mobility as a Service section. Please coordinate with Caltrans since we are currently developing a similar statewide program. These efforts may improve the accessibility and affordability of transit services which may result in reduced emissions, VMT and congestion.</p>	<p data-bbox="1167 1346 1965 1399">Thanks for your comment. We look forward to working with Caltrans on MaaS and integrated payment advocacy, guidance and work.</p>

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001553 Related Documents Link
0001553.02	Consider incorporating discussion of policies of various agencies to promote existing and future Park and Ride lots that may increase carpooling, bicycling and transit use as options for commuters. This would reduce VMT and congestion.	Comment noted. The Congestion Management Technical Report provides a discussion on park and ride lots as a Transportation Demand Management strategy.
0001553.03	Due to ROW constraints on the State Highway System (SHS), implementing Intelligent Transportation Systems strategies, as discussed in the core vision of the 2020-2045 RTP/SCS, would allow for enhanced capabilities to protect transportation systems and shorten response times, enhancing operations of the SHS.	Thanks for your comment. We agree and look forward to continuing work with Caltrans and member agencies to increase understanding and adoption of ITS strategies.
0001553.04	Review of the Project List has highlighted the following inconsistencies:- Project FTIP ID- ORA000820- SR 57 Truck Climbing has a total Cost of \$164.2 million- Project FTIP 10- ORA131301- SR 55 Add 1 Mixed Flow Lane from 1-5 to SR 91 has a total Cost of \$151.1 million- Project FTIP ID- ORA131303- SR 57 Orangewood to Katella has a total Cost of \$70.6 million- Project FTIP ID- ORA131304 -1-405 Add 1 Mixed Flow Lane from 1-5 to SR 55 has a total Cost of \$176 million	Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Total project costs to the projects described here will be reflected as submitted by OCTA.
0001553.05	Attachment BCaltrans District 7 - Environmental Planning• Footnote 75: the hyperlink to the Induced Travel Calculator may need to be corrected by simply removing "on October 25" from the clickable hyperlink. The hyperlink currently includes the phrase "on October 25" when clicked. • Page 3.17-8, Regional High-Occupancy Vehicle (HOV) System and Park and Ride System: please clarify if the HOV system described in this section includes the High Occupancy Toll (HOT) I express lanes. General information on the HOT lanes in the SCAG region (LosAngeles County in particular) and how HOT/Express and HOV lanes differ may be useful for this section. • Wildlife Crossing: Besides the Liberty Canyon Wildlife Crossing that connects the Santa Monica Mountains to the open space of Simi Hills and Santa Susana Mountains, there is another opportunity for a different Wildlife Crossing at Conejo Grade around Camarillo andThousand Oaks that needs to be looked at. • SCAG, Metro, and Caltrans should fund projects that will improve culverts for wildlife usage, especially in the rural areas of Ventura County. • There is also opportunity for wildlife crossings, connectivity, and corridor improvements on State Route 2 and Interstate 210 around La Canada Flintridge, State Route 118, and State Route 126 around the Moorpark and Filmore area. • Rocky Peak on State Route 118 needs fencing and habitat connectivity including corridor improvements for wildlife. • Areas along Interstate 5 and State Route 14 at Sylmar, Granada Hills and north of Santa Clarita need open space to be connected (habitat connectivity) for wildlife movement. • Access to public parks and open spaces need to be improved. Special buses at discount rate (to take people from inner-city to these parks) will be very helpful to inner-city parents and families since many inner-city neighborhoods are far from parks that have interestingresources. • Besides light-rails and all proposed transportation projects, governmental agencies within Downtown Los Angeles and other large cities should consider alternative working hours and equip their staff to telecommute 3-4 times a month. This will improve lives and air quality.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

ID	Comment	Response
<i>Submitted by</i>	California Department of Transportation	Submittal 0001553 Related Documents Link
0001553.06	<ul style="list-style-type: none"> • Cal-Fire should have fire continues education for areas in the cities that borders open spaces. Training should be giving to volunteers and people who are willing to assist Fire Officers and crew. We strongly encourage utility companies to place their utilities lineunderground (buried) in areas that are prone to wildfires. • We believe some cities within SCAG's Region collects rainwater and run-off water. Since the average annual rainfall is between 12-22 inches, SCAG should encourage cities to capture rainwater, treat it and release it to our dry ravines. 	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
<i>Submitted by</i>	California Dept. of Fish and Wildlife	Submittal 0001348 Related Documents Link
0001348.01	We applaud SCAGs development of the Connect SoCal Plan. Thank you for the opportunity to comment on passages covering regional conservation planning tools. Please see the attached document for suggested clarifications regarding the benefits and uses of those tools.	Comment noted. Proposed revisions will be addressed in the Final Connect SoCal.
<i>Submitted by</i>	California High Speed Rail Authority	Submittal 0001442 Related Documents Link
0001442.01	The California High-Speed Rail Authority (Authority) received the Public Notice of Availability letters from SCAG for the Connect SoCal Draft Plan and the Connect SoCal Draft Program Environmental Impact Report (PEIR), dated November 14, 2019 and December 9, 2019 respectively. Connect SoCal is SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Southern California region, covering the timeframe from 2020 to 2045. The Authority has reviewed both the Connect SoCal Draft Plan and the Connect SoCal Draft PEIR, and respectfully provides SCAG with the following comments: - Draft Plan, page 69: The Authority will release its Draft 2020 BusinessPlan in February 2020 for public review and comment. Final adoption of the 2020 Business Plan is expected at CHSRA's April 2020 Boardmeeting, for submittal to the State Legislature by May 1, 2020.- Draft Plan, page 69: The Authority has not yet executed a Proposition 1A funding agreement with Los Angeles Metro for the LINK US project. The Authority, Metro, and the California State Transportation Agency (CalSTA) did execute a Memorandum of Understanding (MOU) in September 2019 which established a commitment for these agencies to work together cooperatively towards taking the necessary steps for this funding agreement to be established.	The Final Connect SoCal and Passenger Rail Technical Report will be updated to address these comments. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10.0 Corrections and Additions of the Final Connect SoCal PEIR.

ID	Comment	Response
<i>Submitted by</i>	California High Speed Rail Authority	Submittal 0001442 Related Documents Link
0001442.02	Draft Plan, Passenger Rail Technical Report, page 13: The Authority 2018 Business Plan does include discussion of the Phase 2 system from Los Angeles to San Diego. - Draft Plan, Passenger Rail Technical Report, page 14: Current schedules for the Authority's Southern California sections are as follows: - Bakersfield to Palmdale – Draft EIR/EIS documents are expected in early 2020, and Final EIR/EIS documents are expected in 2021. - Palmdale to Burbank – Draft EIR/EIS documents are expected in 2020, and Final EIR/EIS documents are expected in 2021. - Burbank to Los Angeles – Draft EIR/EIS documents are expected in early 2020, and Final EIR/EIS documents are expected in 2021. - Los Angeles to Anaheim – Draft EIR/EIS documents are expected in 2020, and Final EIR/EIS documents are expected in 2021. - Draft Plan, Passenger Rail Technical Report, page 31: Same comment as the Draft RTP/SCS, page 69 regarding the LINK US project. - Draft Plan, Passenger Rail Technical Report, page 34: There is no highspeed rail station planned in Sylmar. - Draft Plan, Passenger Rail Technical Report, page 42: Same comment as the Draft RTP/SCS, Passenger Rail Technical Report, page 13 regarding the HSR Phase 2 system. Also, remove Madera and replace with Merced.	The Final Connect SoCal and Passenger Rail Technical Report will be updated to address these comments.
0001442.03.1	- Draft Plan, Project List Technical Report, page 128: The projected cost to complete California High-Speed Rail Phase 1 – ENV/PE is \$332 million for the Southern California project sections. This is consistent with the CHSRA 2019 Project Update Report (PUR), released in May 2019. COMPLETION YEAR – 2021, not 2017. - Draft Plan, Project List Technical Report, page 242: The projected cost to complete the California High-Speed Rail Phase 1 system is \$38.96 billion for the Southern California project sections. This is consistent with the Authority 2018 Business Plan Capital Cost Basis of Estimate Report, released in June 2018. - Draft Plan, Project List Technical Report, page 242: California High-Speed Rail Phase 2 – ENV/PE can be removed from the financially constrained RTP/SCS project list.	Comment noted. Table 2 of the Project List Technical Report has been revised to include the noted changes for Phase 1 and 2 ENV/PE projects. However, the total project cost revision to 7120010, was not incorporated. The cost provided by the commenter from the 2018 Business Plan includes segments outside of the SCAG region, while SCAG's estimate conservatively represents the cost for the portion of the project only within the SCAG region.
0001442.03.2	- Draft PEIR, Financially-Constrained RTP/SCS Projects, page 128: Same comment as the Draft RTP/SCS, Project List Technical Report, page 128. In addition, the Completion Year should be changed from 2017 to 2021. -Draft PEIR, Financially-Constrained RTP/SCS Projects, page 243: Sametwo comments as the Draft RTP/SCS, Project List Technical Report, page242.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10.0 Corrections and Additions of the Final Connect SoCal PEIR.
0001442.04	In addition, we want to highlight related work that the Authority and SCAG have done in partnership with the City of Palmdale and the City of Burbank to help fund Station Area Planning efforts that will result in infrastructure and land use changes near future HSR stations and existing Metrolink stations, including the Palmdale Transit Area Specific Plan, and the Burbank Golden State Specific Plan. Both these efforts are ongoing and are related to Connect SoCal. Thank you for your consideration of these comments.	Thank you for your comment. SCAG appreciates the opportunity to partner with the California High-Speed Rail Authority on high-speed rail and station area planning in the SCAG region.

ID	Comment	Response
<i>Submitted by</i>	California Native Plant Society	Submittal 0001447 Related Documents Link
0001447.01	<p>Dear Connect SoCal Team, Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS), collectively called Connect SoCal. The California Native Plant Society (CNPS) has advocated since 1965 for California vegetation from rare plants to ecosystems. We bring together science, conservation, education, and gardening to support native plants and their benefits. Benefits include ecosystem services (for example clean air and water), biodiversity, wildlife and pollinator support, aesthetics, and human recreation and enjoyment. State-wide programs are based in Sacramento and local activities based in 35 chapters across the state. More information is available at cnps.org. The CNPS Orange County Chapter continues to be part of the growing coalition coordinated by Friends of Harbors, Beaches and Parks that supports the inclusion of natural lands mitigation and policies within the SCAG plan. We offer the following comments on the Natural and Farmland policy, goals, and next steps.</p> <ol style="list-style-type: none"> 1. We support your adding Conservation of Our Natural and Agricultural Lands as one of the ten main policies of Connect SoCal. This action is appropriate given the cumulative impacts to the environment and losses of nature's benefits from past and future transportation and other development actions. The Green Print project with The Nature Conservancy is exciting work within this policy area. 2. We support mitigation strategies of ecosystem restoration, protection of wildlife and native vegetation and riparian corridors, and permanently conserved lands. Long term to permanent preservation requires acquisition, easement, and/or a state or federally adopted Conservation Plan. These strategies are at levels appropriate for balance with environmental challenges associated with mass transportation networks in mega-metropolitan regions. 3. Consider aligning residents with Connect SoCal Natural Lands projects by using simple messages, signage, and education. Describe tangible improvements and benefits. 	Thank you for your comments. Comments noted.
0001447.02	<p>Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. We request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to jenkinsbradc@gmail.com.</p>	Thank you for your comments. Comments noted. In the coming years, SCAG will be working with local and regional entities to assist in the cross-jurisdictional coordination of conservation strategies. Your group is encouraged to participate in the effort, and we will send notifications about upcoming opportunities to the provided email address.

ID	Comment	Response
<i>Submitted by</i>	Californians for Electric Rail	Submittal 0001376 Related Documents Link
0001376.01	<p>Californians for Electric Rail welcomes the opportunity to submit the below public comments on the SCAG’s Connect SoCal 2020 SCAG RTP/SCS. Also, attached is a more detailed proposal for electric short-haul freight rail service in the SCAG region. It is commendable that the 2020 Connect SoCal plan Goods Movement technical report describes the importance of workforce development, transportation safety and zero/near-zero emissions vehicles at the outset. The level of investment that the railroads and government agencies are making into the region’s freight rail network is impressive (Rail Strategies, pgs. 40- 46). With \$14.5 billion targeted for the proposed rail projects, a significant portion of this will likely come from public sources. To accelerate the commercial availability of cleaner locomotive technologies, public funding will be required to put pilot fleets of advanced locomotives into service to demonstrate the equipment’s viability. The mainline, port area rail, railyard and grade separation projects are worthy of public support, given the economic and public benefits to the region. In order to maximize this support, government agencies should leverage their contributions to railroad companies to encourage the best available cleaner locomotive technologies, with an eventual goal of zero-emissions.</p>	<p>SCAG appreciates the comments from Californians for Electric Rail and looks forward to continued input during and following adoption of Final Connect SoCal. SCAG will review the detailed proposal for electric short-haul freight rail service in the SCAG region.</p> <p>SCAG does not make any funding contributions to railroad companies, especially as implementation is not within the purview of the agency. SCAG is supportive and willing to facilitate opportunities, as appropriate and feasible, to work collaboratively with public and private sector concerns to advance funding and implementation of strategies to enhance the movement of goods throughout the region while mitigating is negative effects.</p>
0001376.02	<p>Freight Rail Emissions Reduction Strategies-Less than 5% of non-electrified Rail activity within the SCAG region is conducted with Tier 4 or better locomotives (p. 62), and CARB has presented data that the locomotive inventory is going backwards with older equipment being brought back into service as it is more capable and maintainable than newer low emissions locomotives. Further, Metrolink is reporting that their new Tier 4 fleet is using more fuel than anticipated, which means greater carbon emissions than anticipated. While Tier 4 diesels significantly reduce the pollution caused by legacy diesel locomotives, Tier 4 locomotives still emit 6.5 times the NOx and 30 times the PM emissions of 2010 and newer on-road trucks and are not a viable long-term solution to increase air qualities. Fully zero-emission electric locomotives need to be introduced in the SCAG region where the technology is appropriate today. Applications such as switchyard locomotives are an ideal opportunity for introduction of battery-electric switcher locomotives. Technologies in Development (pgs. 127-128): Long-Term Emissions Strategies for Rail-The so-called ‘long term’ electrification strategies can actually start being deployed in the short and medium term. This section mentions how in late 2017, the California Air Resources Board awarded funding to a demonstration project at the Port of Los Angeles, in partnership with Pacific Harbor Lines, of a battery-electric/natural gas hybrid locomotive developed by VeRail Technologies. However, this project was not completed as VeRail has since ceased operations. This is failed project, and reference to it should be removed.</p>	<p>Tier 4 locomotives are being phased in slowly as railroads do not find it economical to retire older equipment before the end of its useful life. While not zero emission, relative to Tier 2 engines, Tier 4 engines produce between 75-85 percent less NOX and PM emissions. Corrections are reflected in the Final Connect SoCal to address comments about the referenced locomotive demonstration project.</p>

ID	Comment	Response
<i>Submitted by</i>	Californians for Electric Rail	Submittal 0001376 Related Documents Link
0001376.03	<p>Technologies in Development (pgs. 127-128):The paragraph ‘Options for Zero-Emissions Operation’ (pg. 128) omits the technology of all battery-electric locomotives. While a hybrid electric locomotive is mentioned briefly, in practice an all-battery, zero-emissions locomotive can be paired with an existing diesel locomotive to operate has a hybrid pair. This is a viable option for zero-emissions locomotive track miles of operation in the SCAG region. Battery-electric locomotives could also be easily used as switchers in railyards. Such operation within a railyard avoids the operational (locomotive change-out) and range limitations which would make battery operation a challenge for line-haul freight and regional passenger trains. Zero-emissions switcher locomotives would also directly replace existing diesel switchers, which are typically the oldest and dirtiest locomotives in a railroad fleet. These dirty locomotives in urban railyard service have a disproportionate impact on neighboring communities, so replacing them with electric switchers would have significant public health benefits.</p>	<p>A discussion of the battery-electric locomotive will be addressed in the Final Connect SoCal.</p>
0001376.04	<p>The ‘Goods Movement Technologies’ sections of the Connect SoCal Emerging Technologies chapter should discuss electric rail, along with new intermodal rail car technologies which will encourage mode shift from truck to rail.</p>	<p>Electrification technologies require further evaluation to more precisely address questions about cost, funding and how to best implement such systems with minimal operational impacts. Because of the costs and potential operational challenges associated with mainline electrification, such a strategy should be considered a longer-term initiative, requiring further studies as well as proof of concept and prototype testing of zero emission locomotive technologies that have the potential to minimize cost and operational impacts. Electrification of the rail system in the SCAG region would require the leadership of UP Railroad and BNSF Railway. Electric rail technologies are briefly discussed in Appendix 1 of the Goods Movement Technical Report, entitled Near and Long Term Zero and Near Zero Emissions Technology Opportunities for Trucks and Rail. Due to market forces and the demand for flexibility, such strategies still might not lead to a mode shift.</p>

ID	Comment	Response
<i>Submitted by</i>	Californians for Electric Rail	Submittal 0001376 Related Documents Link
0001376.05	<p>Short-haul freight rail in the SCAG region- Alternatives to truck transportation are much needed in the Los Angeles metro area, which is afflicted by the worst highway congestion and air quality in the nation. To address pollution and congestion, a mode shift of more freight from truck to rail is critical in Southern California. There would be major environmental and energy-savings benefits to short-haul freight rail service. Moving a ton-mile of freight by rail uses 1/3rd to 1/5th the energy (and resulting pollution) compared to truck. This is true whether you are comparing diesel truck to a diesel train, or an electric truck to electric train. California's goals to reduce greenhouse gas emissions dependent on cleaner freight transport, and more rail must be part of the solution. About a third of all containerized imports that move through the San Pedro Bay ports go by truck to warehouses and distribution centers in San Bernardino and Riverside counties. With fast, frequent short-haul freight rail shuttle trains between San Pedro Bay and the Inland Empire, much of this freight presently moved by truck can be shifted to rail, to reduce highway congestion and pollution. It was estimated that on-dock rail would account for 35% of incoming intermodal freight by 2040 (Port Area Rail Infrastructure Improvements, pg. 44). However, the San Pedro Bay Ports' Clean Air Action Plan (CAAP) calls for 35% by 2020 (this year), and 50% by 2030. To help achieve this goal, the CAAP stated that "the Ports will explore the potential of short-haul rail in inland sorting facilities about 60 to 80 miles away from the Port area". The 2018 California State Rail Plan also described the potential benefits of short-haul freight shuttle trains : "Short-haul rail shuttles connecting ports with inland regions hosting substantial international trade-related distribution activity offer the opportunity to improve the velocity of the flow of goods into and out of the densely populated regions of Southern California and San Francisco Bay Area. With sufficiently high volumes, short-haul rail shuttles transfer the volume of freight truck traffic away from the already congested highways, particularly in and around the major ports".</p> <p>(From California State Department of Transportation, 2018 California State Rail Plan, Public Release Draft, November 2017, section 5.2.6 Short-Haul Rail Improvements), pg. 168:http://www.dot.ca.gov/californiarail/docs/CSRP_PublicReleaseDraft_10112017.pdf)</p>	<p>The introduction of short-haul rail from the San Pedro Bay Ports to locations in the Inland Empire necessarily leads to the discussion of an inland port facility. SCAG, and other regional agencies, have researched the feasibility of short-haul rail to an inland port previously. While there are obstacles to the implementation of a short-haul rail system, it demands more research and stakeholder engagement. Some of the most difficult challenges include, but may not be limited to: 1) securing the participation of either or both Union Pacific Railroad and/or BNSF Railway as this is a prerequisite for development of an inland port and rail shuttle as each would have to consider plans that would encompass rail operating, pricing, and equipment options, and capacity, and 2) siting for an intermodal terminal which requires high quality access to both the railway and highway networks, is near a large cluster of customers, is big enough to support the expected volume and to allow for expansion, is inexpensive to develop, and is in a friendly community. SCAG remains open to facilitating discussions with both private and public stakeholders about the feasibility of a short-haul train service as appropriate.</p>

ID	Comment	Response
<i>Submitted by</i>	Californians for Electric Rail	Submittal 0001376 Related Documents Link
0001376.06	<p>Short-haul freight rail between San Pedro Bay and the Inland Empire could be a more cost-effective and environmentally friendly alternative to new truck-only lanes proposed as part of the ‘Clean Freight Corridor System’/‘East-West Freight Corridor’ (pgs. 48-51). It is worth noting that both the Georgia Ports Authority and the Ports of Virginia are growing as competitors to the San Pedro Bay Ports, especially given the Panama Canal expansions [Competition with Other Gateways, p. 33]. The Ports of Los Angeles and Long Beach stand to lose more business to these East Coast competitors, who are already benefiting from the decongestion and capacity advantages of short haul freight rail service to inland intermodal terminals. The Port of New Orleans is also seeking to develop an inland port served by short-haul rail. Shifting of more cross-border freight from truck to rail needs to be listed as a ‘key transportation strategy’ to improve flow of goods across the border (International Port of Entry Strategies, pg. 56). As with short-haul freight rail within the SCAG region, this U.S.-Mexico short-haul service would be enhanced with rapid-loading intermodal rail car technology. The Carrizo Gorge Railway aka the Desert Line of the San Diego & Arizona Eastern Railway (owned by San Diego Metropolitan Transit System) is in the process of being restored to service by the Baja California Railroad. This rail line has great potential to reduce truck traffic moving east from the factories of Tijuana along the steep and dangerous stretch of I-8 through the Jacumba Mountains.</p>	<p>The introduction of short-haul rail from the San Pedro Bay Ports to locations in the Inland Empire necessarily leads to the discussion of an inland port facility. SCAG, and other regional agencies, have researched the feasibility of short-haul rail to an inland port previously. While there are obstacles to the implementation of a short-haul rail system, it demands more research and stakeholder engagement. Some requirements may include, but may not be limited to: 1) the participation of either or both Union Pacific Railroad and/or BNSF Railway as this is a prerequisite for development of an inland port and rail shuttle as each would have to consider plans that would encompass rail operating, pricing, and equipment options, and capacity, and 2) siting for an intermodal terminal which requires high quality access to both the railway and highway networks, is near a large cluster of customers, is big enough to support the expected volume and to allow for expansion, is inexpensive to develop, and is in a friendly community. SCAG remains open to facilitating discussions with both private and public stakeholders about the feasibility of a short-haul train service as appropriate. It is critical to note that while the expansion of the Panama Canal could create significant competition for the San Pedro Bay Ports, it must also be coupled with private market forces (e.g., cost savings using the new canal, service reliability, etc.) and public sector investments (e.g., dredging and channel deepening at competing ports, landside infrastructure, etc.). SCAG is supportive of efforts related to the Desert Line and its potential. It is also aware of the private sector forces and institutional barriers related to a mode shift from truck to rail.</p>
0001376.07	<p>Land use and infrastructure planning (Environmental Conditions and Technology Advancement Strategies, pg. 57) can help shift more freight movement from truck to rail. Land use planning needs to avoid “logistics sprawl”, just as it would need to discourage inefficient residential suburban sprawl. The answer is to concentrate logistics/warehouse/distribution facilities adjacent to rail hubs, and not far flung locations reachable only by truck.</p>	<p>SCAG agrees that there needs to be greater integration between land use planning and goods movement/infrastructure locations, especially as it can have significant effects on congestion, emissions, and quality of life issues. With more than 1.2 billion square feet of warehousing space currently in the region, and with future demand expected to grow significantly, there are some limitations to the amount of logistics/warehouse/distribution locations that can be placed near rail hubs. Moreover, due to market forces and the demand for flexibility, proximity to a rail yard, still might not lead to a mode shift.</p>

ID	Comment	Response
<i>Submitted by</i>	Californians for Electric Rail	Submittal 0001376 Related Documents Link
0001376.08	<p>Battery Electric Regional Passenger and Short-Haul Freight Rail in Southern California:</p> <p>Future battery-electric locomotives, especially hybrid battery-catenary versions, can play an important role in short-haul freight rail service, along with passenger service. This concept for the Southern California region was supported by the San Pedro Bay Ports 2017 Clean Air Action Plan. About a third of all containerized imports that move through the San Pedro Bay ports go by truck to warehouses and distribution centers in San Bernardino and Riverside counties. With fast, frequent short-haul freight rail shuttle trains between San Pedro Bay and the Inland Empire, much of this freight presently moved by truck can be shifted to rail, to reduce highway congestion and pollution. The faster acceleration and zero-emissions track miles enabled by electric locomotives will greatly enhance the environmental and de-congestion benefits of short-haul freight rail service. As the battery switcher locomotive technology is developed in the next several years, with operational enhancements provided by advanced charging stations, short-haul freight rail is a natural application for the technology. Future versions of battery-electric locomotives, equipped with a pantograph, could utilize track in the region which will be electrified with conventional overhead catenary wire. Range extension of a battery-electric locomotive can be achieved by a conventional overhead catenary wire, or by more advanced means such as wireless power transfer. Locomotives with both batteries and a retractable overhead pantograph for receiving power from overhead catenary could utilize catenary wire where it exists, and run only on battery where there is no catenary.</p>	<p>The introduction of short-haul rail from the San Pedro Bay Ports to locations in the Inland Empire necessarily leads to the discussion of an inland port facility. SCAG, and other regional agencies, have researched the feasibility of short-haul rail to an inland port previously. While there are obstacles to the implementation of a short-haul rail system, it demands more research and stakeholder engagement. Some requirements may include, but may not be limited to: 1) the participation of either or both Union Pacific Railroad and/or BNSF Railway as this is a prerequisite for development of an inland port and rail shuttle as each would have to consider plans that would encompass rail operating, pricing, and equipment options, and capacity, and 2) siting for an intermodal terminal which requires high quality access to both the railway and highway networks, is near a large cluster of customers, is big enough to support the expected volume and to allow for expansion, is inexpensive to develop, and is in a friendly community. SCAG remains open to facilitating discussions with both private and public stakeholders about the feasibility of a short-haul train service as appropriate. Notwithstanding previous issues concerning a short-haul rail previously raised, SCAG is technology agnostic but would support technologies that improve freight flow and efficiency while diminishing or eliminating the deleterious impacts of harmful emissions.</p>
0001376.09	<p>The California High Speed Rail Authority and Metrolink have plans to electrify major passenger corridors which are shared with freight operations, and the Alameda Corridor serving the ports is a likely candidate for conventional electrification. These battery-catenary hybrids could also run only on battery where there is no catenary, such as in railyards and tracks on the port docks, or lines and sidings which do not have the traffic to economically justify installation of overhead catenary. Electrification of the Alameda Corridor, combined with other infrastructure projects and policies which encourage shifting of port freight movement from truck to rail, is a superior environmental and socially-acceptable alternative to adding more lanes to the I-710 freeway. Proposed plan of Southern California freight rail electrification: 1. Task force to study short-haul rail electrification in Southern California 2. Pilot short-haul freight rail project in Southern California, with diesel locomotives and FlexiWaggon technology- minimal intermodal facility capital cost. 3. Pilot project of battery-electric switcher in freight rail yard. 4. Range-extension pilot project of battery-electric switchers in Ports, Alameda Corridor, and railyards across the region. 5. Catenary-electric pilot project, building on range-extension battery-electric pilot project.</p>	<p>Comments noted.</p>
0001376.10	<p>Grade Separations-It is commendable that rail-road grade separations are a high priority for the region, as they are such good investments for safety and congestion relief. However, of the Grade Separations in the SCAG Connect SoCal 2020 plan (p. 43 & 92), Orangethorpe in Orange County is listed as a completed grade separation project, and shown as such on the map on Exhibit 18. This is false. There is no grade separation at Orangethorpe in Anaheim, nor is one under construction at the present time. It has been updated to a 'no horn' quiet zone, but is still a surface street crossing.</p>	<p>Corrections are addressed in the Final Connect SoCal. There is no grade separation at the location shown on the referenced map. Instead, the completed Orangethorpe grade separation lies at the intersection of East Orangethorpe Avenue and East Chapman Avenue just north of Anaheim Lake. The grade separation was complete in October 2016. More information can be found at the Orange County Transportation Authority project page. The information will be updated in the table, project list, and maps in the Goods Movement Technical Report.</p>

ID	Comment	Response
<p><i>Submitted by</i> Californians for Electric Rail Submittal 0001401 Related Documents Link</p>		
0001401.01	<p>The white paper "The Potential of Electric Freight Rail in Southern California" is attached as an additional document as part of comments previously submitted comments by Californians for Electric Rail (www.calelectricrail.org)</p>	<p>Comment noted.</p>
<p><i>Submitted by</i> Californians for Electric Rail Submittal 0001402 Related Documents Link</p>		
0001402.01	<p>Dear Connect SoCal Team,The attached Rapid Transit for Orange County white paper is provided as input to the Connect SoCal 2020 Regional Transportation Plan/Sustainable Communities Strategy. It is a collaboration of the groups Californians for Electric Rail, Southern California Transit Advocates, People for Housing OC, and the Climate Action Campaign. We see there is a need for more ambitious plans for mass transit in Orange County than those so far laid out in SCAG and OCTA plans. We welcome regional transportation planning efforts of the Southern California Association of Governments. We see this planning process an opportunity for Southern California to find region-wide solutions to pressing problems of housing, pollution, congestion, social equity and transportation safety.</p>	<p>Thank you for your comment. SCAG coordinates with the county transportation commissions and transit operators in the region to identify financially constrained long-range transit improvements. The transit projects included in Connect SoCal for Orange County reflect the input from the Orange County Transportation Authority (OCTA) developed through its Transit Master Plan, identifying an OC Transit Vision for enhancing and expanding public transit, and its Long Range Transportation Plan. Additional transit investments that do not currently have funding may be considered in future plan updates.</p>
<p><i>Submitted by</i> Center for Biological Diversity Submittal 0001444 Related Documents Link</p>		
0001444.01	<p>These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Draft Program Environmental Impact Report ("DEIR") for Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"). The Center has reviewed the DEIR and RTP/SCS and provides these comments for consideration by the Southern California Association of Governments (SCAG).The Center is encouraged to see several conservation facets of the RTP/SCS, including SCAG's attention to preserve, enhance, and restore regional wildlife connectivity (RTP/SCS at 50), avoid growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas and floodplains (RTP/SCS at 55), encourage housing and commercial development near public transit and urban areas (RTP/SCS at 48) and incorporate greenbelts into planning initiatives (RTP/SCS at 55). The Center respectfully submits these comments to help achieve SCAG's aspirations of a "healthier, safer, more resilient and economically vibrant region" by facilitating a comprehensive approach to growth that addresses human transportation and development needs, the needs of wildlife and habitats that are fragmented by transportation infrastructure and development, and how we can make human and natural communities more resilient to climate change.The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Southern California.</p>	<p>Thank you for your comments on the Draft Connect SoCal and associated PEIR.</p>

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0001444.02	<p>The Center is encouraged to see the inclusion of Goal #10, “Promote conservation of natural and agricultural lands and restoration of critical habitats” (DEIR at ES-7); however, integrating wildlife connectivity is critical to overall ecosystem health and biodiversity. Doing so would also improve chances of attaining other goals, including supporting healthy and equitable communities, reducing greenhouse gas emissions and improving air quality, and adapting to climate change. Preserving and restoring habitat connectivity would help ensure invaluable ecosystem services that benefit human communities, including but not limited to water purification, erosion control, groundwater recharge, resilience to extreme weather events (e.g., severe storms and flooding), carbon sequestration, and crop pollination.</p>	<p>Thank you for your comment. SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Additionally, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to: "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>
0001444.03	<p>As mentioned in the Center’s Notice of Preparation comment letter, roads and traffic create barriers that lead to habitat loss and fragmentation, which harms wildlife and people. As barriers to wildlife movement and the cause of injuries and mortalities due to wildlife vehicle collisions, roads and traffic can affect an animal’s behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018). For example, habitat fragmentation from roads and traffic has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Riley et al. 2006, 2014, Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term and “[conservation] plans that focus solely on habitat area, will leave unrealized the substantial, complementary, and persistent gains in biodiversity attributable specifically to landscape connectivity,” (Damschen et al. 2019).The Center recommends the goal be edited as follows:Goal #10: “Promote conservation of natural and agricultural lands and habitat connectivity and restoration of critical habitats and wildlife movement corridors.”</p>	<p>While not specifically listed in Goal #10, habitat connectivity, including wildlife corridors, is an important aspect of the Connect SoCal. Habitat connectivity areas are identified as growth constraints in the Plan's scenario development and methodology, and "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to: "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>

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0001444.04	<p>Wildlife vehicle collisions pose a major public safety and economic threat, as well as a threat to the region’s wildlife and biodiversity. During 2015 to 2018 more than 26,000 incidents involving vehicles and wildlife were reported to the California Highway Patrol, which included reports of animals standing next to, in, or running across lanes, collisions with large animals, or swerving to avoid collisions and resulting in a crash (Shilling et al. 2019). State reports and car insurance companies estimate that that 7,000 to 23,000 wildlife vehicle collisions (with large mammals) have occurred annually on California roads (Shilling et al. 2017; Shilling et al. 2018; Shilling et al. 2019; State Farm Insurance Company 2016, 2018). These crashes result in human loss of life, injuries, emotional trauma, and property damages that can add up to an estimated \$300-600 million per year and over \$1 billion from 2015-2018, based on reported wildlife vehicle collisions. And it is important to note that collisions with large animals often go unreported as much as 5- to 10-fold (Donaldson and Lafon 2008; Olson et al. 2014; Donaldson 2017) Thus, avoiding and minimizing impacts of transportation projects and development on wildlife movement and habitat connectivity would help preserve biodiversity and ecosystem health while protecting human health and safety.</p>	<p>SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Additionally, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to: "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>
0001444.05	<p>The Guiding Principles should reflect the need to adequately address wildlife movement and habitat connectivity issues to minimize wildlife vehicle collisions. Outside of California many states, including Arizona, Colorado, Florida, Montana, Nevada, Oregon, New Mexico, Utah, Washington, and Wyoming, have been proactively addressing wildlife connectivity issues and realizing the benefits of wildlife crossing infrastructure. For example, Arizona, Colorado, and Wyoming have seen 80-96% reductions in wildlife vehicle collisions while gradually increasing the level of wildlife permeability over time (it appears that some species take more time than others to adapt to crossings) on sections of highways where they have implemented wildlife crossing infrastructure, such as underpasses, culverts, overpasses, wildlife fencing, and escape ramps (Dodd et al. 2012; Sawyer et al. 2012; Kintsch et al. 2018). Utah just completed the state’s largest wildlife overpass at Parleys Canyon for moose, elk, and deer. Washington State is about to complete its largest wildlife overpass on I-90, which is anticipated to provide habitat connectivity for a wide variety of species between the North and South Cascade Mountains. The overpass cost \$6.2 million as part of a larger \$900 million expansion project that will include multiple wildlife crossings along a 15-mile stretch of highway. Savings from less hospital bills, damage costs, and road closures from fewer wildlife vehicle collisions will make up those costs in a few years (Valdes 2018). State transportation departments are actively pursuing these types of projects because of the benefits for wildlife connectivity, public safety, and the economy. California needs to follow suit and more actively invest in preserving habitat connectivity where there are no roads while also enhancing or restoring connectivity where roads or other transportation infrastructure already exist.</p>	<p>SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Connect SoCal addresses habitat connectivity in the scenario methodology as well as strategies and next steps outlined in the Natural & Farm Lands Conservation Technical Report.</p>

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0001444.06	<p>The Draft Plan recognizes two important ecological components about southern California. First, it recognizes the incomparable biological diversity of California, due primarily to its flora: “The region’s desert, mountain and coastal habitats have some of the highest concentrations of native plant and animal species on the planet. Southern California is part of the California Floristic Province, one of the planet’s top twenty-five biodiversity hotspots.” (RTP/SCS at 23) Secondly, it recognizes the significant contribution to greenhouse gas sequestration that plants, exposed soils and open space provide: “In addition to their respective roles in biodiversity and food production, both natural areas and farmlands help reduce the impacts of climate change by capturing greenhouse gases in the soil, plants, and trees instead of allowing them to concentrate in the atmosphere.” (RTP/SCS at 36)</p>	Thank you for your comment.
0001444.07	<p>In addition, southern California native plants are adapted to our unique “Mediterranean” climate and persist in our relatively arid conditions where rainfall primarily occurs on the winter. For all of these reasons, the Draft Plan needs to adopt the commitment to the preferential use of native plants as part of the final 2020-2045 Regional Transportation/Sustainable Communities Plan. Much literature is available on the use of native plants on roadsides. The Federal Highway Administration produced a Managers Guide to Roadside Revegetation Using Native Plants (FHA-DOT 2007), which notes: “Native plants are a foundation of ecological health and function. Revegetating roadsides with native plants is a key practice for managing environmental impacts and improving conditions for healthy ecosystems. The ability to establish native plant communities on roadsides is central to determining whether the transportation corridor will be a healthy environment or a damaged one.” The Guide continues to tout the benefits of using native plants along transportation corridors as follows: “Native plants along roadsides offer ecological, economic, safety, and aesthetic advantages. Ecologically, healthy native plant communities often are the best long-term defense against invasive and noxious weeds. Economically, maintenance costs for managing problematic vegetation are reduced, as are the concerns that sometimes result when weeds from roadsides invade neighboring lands or when pollution from herbicides occurs.”</p>	<p>Connect SoCal emphasizes that the region’s desert, mountain and coastal habitats have some of the highest concentrations of native plant and animal species on the planet. Connect SoCal recognizes that many habitats, both protected and unprotected, are in need of restoration efforts such as non-native species removal, re-introduction of native species, erosion control and re-connecting fragmented areas. One of Connect SoCal’s principal goals is to promote conservation of natural lands and restoration of habitats, which will be supported through a future Regional Advance Mitigation Program.</p> <p>Additionally, project level mitigation measures regarding the preservation of native plants are provided in Section 3.4, Biological Resources (PMM Bio-1 and PMM Bio-1) of the Connect SoCal PEIR.</p>
0001444.08	<p>From the perspective of safety, the FHA states: “The establishment of native plant communities supports transportation safety goals in a number of ways. One of the most important is by improving the function of roadside engineering. Appropriate vegetation can enhance visibility and support design features to help drivers recover if their vehicles leave the pavement. When native plant materials are incorporated into road design, they can improve long-term slope stability while softening visual experiences.”</p>	<p>Comment noted. SCAG recognizes the importance of plants native to Southern California to ensuring a healthy ecosystem and encourages their use in all appropriate capacities. SCAG is interested in exploring strategies and partnerships related to native plants for the implementation of Connect SoCal. Your agency is encouraged to participate in this effort. In addition, the PEIR has been updated to incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.</p>

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0001444.09	<p>Native roadside vegetation helps to identify local place, reduces the cost of roadside maintenance, and requires little to no pesticides (Quarles 2003). Tinsley et al (2007) found that native revegetation grass and forb seed mixes outperformed non-native seed mixes in establishing cover on roadsides and concluded that “suites of early- and late-successional native species can provide a highly effective mix for revegetation projects”. In order to assure successful planting with native plant species, care must be taken when planning native roadside plantings. Plant selection must consider soil type and compaction from engineered slopes, harsh microclimates directly adjacent to roads, invasive species, and pollution from vehicle emissions. Haan et al. (2012) found that “soil characteristics largely determined plant survival” but other considerations were also important considerations. Karim and Mallik (2007) found that “floristic zonation along roadsides is a function of roadside microtopography, substrate type and environmental gradients created by the road building process” and that certain native plant species were more successful in certain zones. Therefore, careful selection of native species is crucial to successfully vegetating transportation corridors. Fortunately, California’s diverse native flora provides the diversity to meet the roadside zones. Several drought tolerant native species lists, tailored to local conditions are readily available for the South Bay of Los Angeles County and coastal southern California.</p>	Comment noted.
0001444.10	<p>Because of the ongoing pollinator crisis, the Draft Plan also needs to adopt the commitment to use best management practices for pollinators as part of the final 2020-2045 Regional Transportation/Sustainable Communities Plan. The Federal Highways Administration (FHA-DOT 2015) provides guidelines for best management practices that will benefit pollinators and includes a focus on using native plants. Wildlife connectivity typically focuses on large animals that require safe passage through and beyond their home territories and because of that scale, automatically protects a suite of more localized plants and animals. Here, linear roadside corridors are obviously inappropriate for large mammals, but can still be important and indeed crucial to plants and small animals, including invertebrates. Therefore, these types of linear features should not be overlooked for their potential ecological benefits.</p>	Please refer to the Connect SoCal PEIR for mitigation measures related to pollinators. The PEIR has been updated to incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.
0001444.11	<p>While some of the SCAG transportation goals include roads and road improvements in urbanized areas, these areas provide great opportunities to transition plantings to native plants that are drought tolerant, sequester carbon, provide linear habitat for local fauna and identify a sense of place based on southern California’s iconic flora. For these reasons and those listed above, the Draft Plan would benefit from the incorporation of a commitment to the preferential use of native plants as part of the final 2020-2045 Regional Transportation/Sustainable Communities Plan.</p>	Connect SoCal emphasizes that the region’s desert, mountain and coastal habitats have some of the highest concentrations of native plant and animal species on the planet. Connect SoCal recognizes that many habitats, both protected and unprotected, are in need of restoration efforts such as non-native species removal, re-introduction of native species, erosion control and re-connecting fragmented areas. One of Connect SoCal’s principal goals is to promote conservation of natural lands and restoration of habitats, which will be supported through a future Regional Advance Mitigation Program.

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0001444.12	Therefore, the Center recommends Connect SoCal Guiding Principles to be edited as follows: Guiding Principle #2: Place high priority for transportation funding in the region on projects and programs that improve human mobility, accessibility, reliability and safety, and wildlife connectivity that is based on native southern California flora.	SCAG recognizes the importance of plants native to Southern California to ensuring a healthy ecosystem and encourages their use in all appropriate capacities. In the coming years, SCAG will be working with stakeholders to implement conservation strategies in Connect SoCal, such as developing a Regional Greenprint as well as a Regional Advance Mitigation Program, where native plant conservation will be considered as a priority strategies. Your agency is encouraged to participate in these efforts, as well as to introduce this issue for consideration in changes to the guiding principles in future plan updates.
0001444.13	Guiding Principle #5: Encourage transportation investments that will result in improved air quality and public health and safety, and reduced greenhouse gas emissions	Comment noted. Guiding Principle #2 addresses the safety issue. Also, goals and guiding principles were developed through a comprehensive process engaging stakeholders, SCAG policy committees and the SCAG Regional Council. Any changes proposed to the goals and guiding principles will need to go through a similar process. However, SCAG will be happy to consider your suggestion in future plan updates.
0001444.14	The Center is encouraged to see that SCAG’s land use strategies include prioritizing infill and redevelopment; facilitating multimodal transportation for various purposes (i.e., work, education, other destinations); urban greening; and avoiding growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas, and floodplains. However, the Transportation Project List contains over 300 pages of projects in Appendix 2.0, many of which include the widening and extension of freeways, which will result in increased greenhouse gas (“GHG”) emissions and fragment landscapes and wildlife connectivity while promoting sprawl development, some of which is located in high fire hazard severity zones.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001444.15	As the Center noted in its NOP comments to SCAG last year, scientific studies and state agency reports from the California Air Resources Board (“CARB”) have shown the state will not achieve the necessary GHG emissions reductions to meet its mandates for 2030 and 2050 without significant changes to how communities and transportation systems are planned, funded and built. Significant reductions in GHG emissions is the only pathway to limiting the impacts of climate crisis, which are already being felt by people and wildlife throughout the state. Those reductions will not be achieved by small half measures of simply encouraging more zero-emission vehicles or hoping local agencies will change their land use decision-making in the future. Instead agencies at all levels—state, regional and local—must take head on the interconnected relationship between the climate crisis and land use, housing, workforce growth and transportation investments. Fundamental changes in land use planning for the future by local and regional land use agencies and hard questions about existing transportation plans must occur.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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0001444.16	<p>For example, the Transportation Project List earmarks an astounding \$600,000,000 for the 138 Northwest Corridor Improvement Project to support leapfrog sprawl development like Tejon Ranch Company’s proposed Centennial city. Centennial would be located 60 miles away from a major work center (i.e, downtown Los Angeles)so the Project’s anticipated 57,000 residents will be forced to drive long distances to reach jobs, schools, and supplies for decades during Project build-out. Centennial alone would generate 75,000 new vehicle trips per day, with an average trip length of 45 miles. The development will also pave over pristine native grasslands rich with endemic and rare species in a mountain lion movement corridor important for statewide genetic connectivity and an area designated as having very high fire hazard severity.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in the Final Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>
0001444.17	<p>In addition to the 138 Northwest Corridor Improvement Project, there are many projects that involve paving over dirt roads, which could lead to increased traffic that would result in increased greenhouse gas emissions from increasing VMT and significant impact on small animal species since roads with heavy traffic may deter movement from a wide range of small animals (Brehme et al. 2013; Brehme et al. 2018). Transportation projects should focus more on public transit infrastructure and less on widening already large freeways and paving dirt roads, both of which facilitate the use of more cars and increase vehicle miles traveled, commute times, air pollution, and greenhouse gas emissions.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in the Final Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>
0001444.18	<p>The Transportation Project List allocates many millions of dollars on I-15 expansion projects even while the I-15 continues to be a major barrier to mountain lion and wildlife movement, and critical wildlife crossings along the I-15 remain unfunded. Instead of further degrading habitat connectivity by expending hundreds of millions of dollars on multi-lane highways in remote areas that will fill up with GHG emitting vehicles, SCAG should prioritize funding for more public transit and adequate wildlife crossings on existing highways. For instance, critical wildlife crossings such as the Liberty Canyon Wildlife Crossing are not yet fully funded. In fact, in the 300-page project list, there is only a single listed proposal for a wildlife crossing.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in the Final Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>
0001444.19	<p>As it stands, the RTP/SCS contains laudable goals regarding sustainable development, reducing VMT, and increasing wildlife connectivity. However, many of the projects on the Transportation Project List will undercut these goals by increasing VMT and exacerbating existing connectivity problems. If SCAG is serious about addressing this region-wide issue, it should work to reallocate funding away from particularly damaging projects and instead allocate funding towards public transit and wildlife connectivity projects.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>

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0001445.01	<p>The Center is encouraged by SCAG’s goals and guiding principles that focus on supporting more development supported by existing public transit. (RTP/SCS at 8.) However, the Center believes SCAG can and should do more to reduce daily vehicles miles traveled. Increases in VMT negatively impact communities by leading to more vehicle crashes, poorer air quality, increases in chronic diseases associated with reduced physical activity, and worse mental health. Also, as noted above, the natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Therefore, any additional step SCAG takes to reduce VMT will have co-benefits of better air quality, decreased chronic disease, decreased wildlife-vehicle collisions, and less habitat fragmentation.</p>	Comment noted.
0001445.02	<p>As currently drafted, the RTP/SCS boasts of a 4.1% reduction in VMT per capita from a 2045 baseline and a 9.5% reduction from the base year of 2016. (RTP/SCS at 5, 122.) However, these reductions are far less than reductions in VMT detailed in the December 2018 Technical Advisory issued by the Governor’s Office of Planning and Research (“OPR VMT Report”). The OPR VMT Report concluded, “achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State’s emissions goals.” (OPR VMT Report at 12.) OPR emphasized that land use decisions to reduce GHG emissions associated with the transportation sector are crucial to meet the state’s GHG reductions goals. (Id. at 3.) The OPR VMT Report further noted that because California cannot meet its climate goals without curbing single-occupancy vehicle activity, land use patterns and transportation options will need to change to support reductions in VMT. (Id. at 10.) Historically regional SCS and RTPs have lead increases in VMT rather than decreasing them as SB 375 intended. While SCAG’s RTP/SCS has taken a small step in the right direction, it is not enough, and more fundamental changes are needed. The Center urges SCAG to utilize the RTP/SCS process to set the region on the path reducing its VMT at the level necessary to address the climate crisis and meet the state’s GHG reduction goals.</p>	<p>Thank you for taking the time to review and comment on the draft Connect SoCal. SCAG has been coordinating closely with OPR throughout the process of SB 743 development and implementation. It’s important to emphasize that the VMT reductions to be achieved through implementation of SB 743 are calculated for new development relative to existing trends. SB 743 provides a prescriptive methodology to begin reversing statewide and regional development trends that have tended to encourage higher per capita VMT. The 15 percent VMT reduction thresholds recommended in the OPR guidelines provide a means for reducing the VMT impact of new development projects to levels that will allow the state to achieve our greenhouse gas emission reduction goals. While the per capita VMT reductions reported in Connect SoCal may appear to be minimal, when attributed to the entire population of the SCAG region of more than 19 million residents, these improvements are very significant and represent meaningful progress toward meeting our GHG emission reduction goals. The effort to constrain growth in the length and duration of motor vehicle trips is a primary focus of Connect SoCal.</p>
0001445.03	<p>The Center is encouraged to see SCAG acknowledge the importance of wildlife corridors and habitat connectivity by including the preservation, enhancement, and restoration of regional wildlife connectivity (RTP/SCS at 50), avoiding growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas and floodplains (RTP/SCS at 55), and drawing attention to greenbelts (RTP/SCS at 55). Mountain lions are a key indicator species of wildlife connectivity. As the last remaining wide-ranging top predator in the region, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their long-term survival. In addition, impacts to mountain lions in the SCAG region could have severe ecological consequences; loss of the keystone species would have ripple effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function. Without mountain lions, increased deer populations can overgraze vegetation and cause stream banks to erode (Ripple and Beschta 2006; Ripple and Beschta 2008). Many scavengers, including foxes, raptors, and numerous insects, would lose a reliable food source (Ruth and Elbroch 2014; Barry et al. 2019). Fish, birds, amphibians, reptiles, rare native plants, and butterflies would diminish if this apex predator were lost (Ripple and Beschta 2006; Ripple and Beschta 2008; Ripple et al. 2014).</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001445.04	<p>In light of recent studies regarding imperiled mountain lion populations in Southern California, the DEIR fails to disclose or describe the RTP/SCS’s severe impacts on mountain lion populations throughout the SCAG region. CEQA requires a “mandatory finding of significance” if there is substantial evidence in the record that the Project may cause a “wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species . . .” (CEQA Guidelines § 15065(a)(1).) This means that a project is deemed to have a significant impact on the environment as a matter of law if it reduces the habitat of a species, or reduces the number or range of an endangered, rare, or threatened species.³ (See <i>Endangered Habitats League, Inc. v. County of Orange</i> (2005) 131 Cal.App.4th 777, 792 fn. 12 [citing <i>Defend the Bay v. City of Irvine</i> (2004) 119 Cal.App.4th 1261, 1273–1274].)</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001445.05	<p>There is ample scientific evidence that indicates mountain lion populations in Southern California are imperiled and that human activities and land use planning that does not integrate adequate habitat connectivity can have adverse impacts on mountain lions. Continued habitat loss and fragmentation has led to 10 genetically isolated populations within California. Several populations in Southern California are facing an extinction vortex due to high levels of inbreeding, low genetic diversity, and high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires (Ernest et al. 2003; Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Benson et al. 2016; Gustafson et al. 2018; Benson et al. 2019). This is detailed in the Center’s petition to the California Fish and Game Commission to protect Southern California and Central Coast mountain lions under the California Endangered Species Act (Yap et al. 2019). Mountain lions in the Santa Monica Mountains and Santa Ana Mountains were found to have dangerously low genetic diversity and effective population size, and they are likely to become extinct within 50 years if gene flow with other mountain lion populations is not improved (Benson et al. 2016; Gustafson et al. 2018; Benson et al. 2019). Due to extreme isolation caused by roads and development, the Santa Monica and Santa Ana mountains populations exhibit high levels of inbreeding, and, with the exception of the endangered Florida panther, have the lowest genetic diversity observed for the species globally (Ernest et al. 2014; Riley et al. 2014; Gustafson et al. 2018; Benson et al. 2019). In addition, Gustafson et al. (2018) found that the nearby mountain lion population in the San Gabriel/San Bernardino Mountains also has low genetic diversity and effective population size, which indicates that they too have a high risk of extinction. The long-term survival of these mountain lions, along with those in the Tehachapi and Sierra Pelona mountains, are vital for statewide genetic connectivity (Gustafson et al. 2018). Improved connectivity among the mountain lion populations within the SCAG Region and beyond is essential for the long-term survival of Southern California mountain lion populations (Gustafson et al. 2017; Gustafson et al. 2018; Benson et al. 2019).</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	Center for Biological Diversity	Submittal 0001445 Related Documents Link
0001445.06	<p>Growth and development in identified “major highway projects” (RTP/SCS at Exhibit 3.2), “transit priority areas” (RTP/SCS at Exhibit 3.7), “priority growth area - high quality transit areas” (RTP/SCS at Exhibit 3.8), and “livable corridors” (RTP/SCS at 3.10) could have severe impacts on Southern California’s already-imperiled mountain lion populations. Such development without addressing wildlife connectivity issues and integrating effective wildlife crossings and corridors could lead to the extirpation of multiple mountain lion populations in the SCAG region. The RTP/SCS should encourage the involvement of wildlife connectivity experts from CDFW and other agencies, organizations, academic institutions, communities, and local groups starting at the initial planning stage of development and transportation projects so that habitat connectivity can be strategically integrated into project design and appropriately considered in the project budget. The RTP/SCS should require highway projects to include adequate wildlife crossing infrastructure in order to reduce impacts to mountain lions and other species.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001445.07	<p>Project planning should consider the impacts of climate change on wildlife movement and habitat connectivity in the design and implementation of projects and any mitigation. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al. 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifici et al. 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al. 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012).</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001445.08	<p>Thank you for the opportunity to submit comments on the DEIR and RTP/SCS for Connect SoCal. We look forward to working with SCAG to foster land use policy and growth patterns that promote wildlife movement and habitat connectivity, facilitate public health and safety, and move towards the State’s climate change goals. Please do not hesitate to contact the Center with any questions at the number or email listed below.</p>	<p>Thank you for your comment.</p>

ID	Comment	Response
<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001560 Related Documents Link
0001560.01	<p>The Center for Demographic Research (CDR) at Cal State Fullerton has reviewed the Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, “Connect SoCal”), its associated appendices, and the growth forecast dataset. We greatly appreciate the opportunity to do so and for all of the work SCAG staff has done to produce these reports and the work with local agencies during the development process. We also want to extend our thanks for the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current and recent construction; open space; and general plan densities. On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast will accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities. On January 8, 2020, CDR requested, on behalf of Orange County jurisdictions, a copy of the final draft growth forecast dataset to confirm that all the technical corrections have been included in the final RTP/SCS growth forecast. On January 14, 2020, CDR was informed that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. It is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected. OCP-2018 surpasses the regional SCS in terms of housing growth mix, which is key to Connect SoCal’s growth vision. Of the total household growth in OCP-2018, from 2016 to 2045, only 19% will be single-family detached households and 81% will be some form of attached unit. Orange County’s housing stock will change from a ratio of 49:51 (SFD to attached product) in 2016 to 46:54 by 2045. These surpass all five growth scenarios reported in the 2020 RTP/SCS Sustainability Technical Report, including even the most aggressive scenario, “Accelerated Tomorrow”. In addition, 68% of housing growth will be infill/redevelopment, while about 36% of the county is permanently preserved as open space.</p>	<p>Thank you for your input and partnership in development of the Growth Forecast and Growth Vision. The final Connect SoCal uses jurisdictional growth totals which reflect local input in all cases. Please refer to the Guiding Principles for the growth forecast included in the Demographics and Growth Forecast Technical Report. In working to finalize the plan’s Forecasted Development Pattern (a reflection of the Growth Vision policies and strategies), SCAG initiated a peer review with local jurisdictions of population, household, and employment growth at the sub-jurisdictional level (i.e. transportation analysis zone (TAZ) level) prior to the release of the draft Connect SoCal plan. Focusing on jurisdictions individually, it was evident that many had visions for future development that were a better match with Connect SoCal’s Growth Vision of regional policies and strategies. Accordingly, technical refinements were made to the Forecasted Development Pattern in Connect SoCal that included adjustments to growth due to entitlements and maximum planned capacities. “Locally envisioned growth” was used in some instances to further Connect SoCal’s Growth Vision of reducing the need for residents to drive by locating housing, jobs and transit closer together - helping to assure that Connect SoCal’s land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities. To ensure transparency during the process to finalize the Forecasted Development Pattern for Connect SoCal, SCAG emailed a letter to each jurisdiction starting February 21 that included a detailed methodology document for SCAG’s Growth Vision. Jurisdictions were also given access to their jurisdictional and neighborhood level Forecasted Development Pattern data via SCAG’s Scenario Planning Model - Data Management Site. Throughout this effort, SCAG engaged with stakeholders from the Technical Working Group, and also provided an update on the peer review exercise to the Community, Economic, and Human Development Policy Committee.</p>

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001560 Related Documents Link
0001560.02	<p>We would like to express support of recommendations by the Orange County Council of Governments, the Orange County Transportation Authority, and other Orange County agencies whose comments support Connect SoCal with its use of the Orange County's growth forecast, the 2018 Orange County Projections. We thank you for the opportunity and ask for your consideration and response to the following comments: 1.Support for the Plan with its use of Orange County's growth forecast so that all development agreements; entitlements; current construction and recent construction; open space; and general plan densities are accurately reflected.2.Oppose the selection of any alternatives in the draft PEIR that do not properly reflect entitlements; development agreements; current construction and recent construction; open space; and general plan densities in Orange County. 3.Maintain objective, unbiased tone. 4.References to "city" or "cities" are changed to "jurisdiction" or "jurisdictions" where appropriate.5.Other Comments on the Draft 2020 Connect SoCal/RTP/SCS documents in Tables 1 through 4 below.</p>	<p>Comments noted. 1. Thank you for your feedback. Prior to the release of the Draft Connect SoCal, SCAG initiated a peer review with jurisdictions to review the neighborhood level growth projections included in the Plan to ensure that development projects already underway (i.e. entitled projects) were captured in Connect SoCal's Forecasted Development Pattern and that locally planned capacities were adhered to for allocating growth (in line with the Growth Forecast Guiding Principles, as included in the Demographics and Growth Forecast Technical Report). After reviewing this input and finalizing the Connect SoCal Forecasted Development Pattern (a reflection of the Growth Vision strategies and policies), SCAG emailed a letter to each jurisdiction starting February 21 that included a detailed methodology document for SCAG's Growth Vision. Jurisdictions were also given access to their jurisdictional and neighborhood level Forecasted Development Pattern data via SCAG's Scenario Planning Model - Data Management Site. Throughout this effort, SCAG engaged with stakeholders from the Technical Working Group, and also provided an update on the peer review exercise to the Community, Economic, and Human Development Policy Committee. 2. With regards to alternatives, please refer to Section 9.0, Responses to Comments of the Final PEIR.</p>
0001560.03	<p>1. All maps and all documents - All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular reference items and the maps need to be standalone documents. Where possible, also include SCAG's logo.2. All documents - Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.3. All documents - Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.4. All documents - Consistency in hyphenation, e.g.:Single-familyMulti-family vs. Multifamily vs. multi familySubregional vs. sub-regional</p>	<p>Thank you for your comments. SCAG will take your comments into consideration.</p>
0001560.04	<p>5. All documents All maps with growth forecast or development typesAdd:"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."8.All documents: The growth forecast should be adopted at no lower than the jurisdictional level</p>	<p>Thank you for your comment. TAZ level data or any data at a geography smaller than the jurisdictional level has been utilized to conduct required modeling analyses and is therefore advisory only and non-binding, as described in the Guiding Principles for the growth forecast in the Demographics and Growth Forecast Technical Report. Maps depicted in the Demographics & Growth Forecast Technical Report show growth at the jurisdictional level (Exhibits 1 through 9).</p>
0001560.05	<p>All documents 6. Maps & other graphics- fonts need to be embedded in PDFs to print properly.7. All tables, charts, graphics need to have original sources and the document title9. Add the following to the glossary; use definitions from PEIR if necessary:Households Absolute constraintsSingle-family Multi-familyConstrained/strategicUnconstrained planPrincipal arterial roadwaysClass 1 Railroads</p>	<p>SCAG will take your comments into consideration.</p>

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001560 Related Documents Link
0001560.06	p. 2, column 1, paragraph 2 - "...the world's fifth busiest airport system, and soon the world's longest light rail transit line, with the completion of the Regional Connector." Define 'airport system' and 'Regional Connector'.	Comment noted. The second paragraph, column 1, in the "Our Region" section will be changed to read, "We are home to...the world's fourth busiest airport...with the completion of the Regional Connector, which will connect transit lines from the Los Angeles Civic Center to the Financial District."
0001560.07	Text change for clarification: 11. p. 2, column 2, paragraph 1 - "...but also by bringing housing and jobs closer together, making commutes shorter and making it easier to get around without a car." 12. p. 10, column 2, paragraph 5 - "The process was guided by the Connect SoCal Guidelines and Schedule..." 13. p. 11, column 1, paragraph 4 - "...SCAG staff has regularly convened topic-specific working groups, which bring together regional stakeholders to discuss the Plan's development and provide technical expertise." 14. p. 12, column 1, paragraph 3 - "SCAG considered input gathered through the CBO engagement and public workshops..." 15. p. 13, column 1, bullet 2 - "Review a comprehensive set of policies, strategies and tools to improve mobility and sustainability"	Thank you for your comments. SCAG will take your comments into consideration.
0001560.08	16. p. 16, column 1, paragraph 3 - "...reflecting on-the-ground conditions from SCAG's 197 jurisdictions." Add the TWG. 17. p. 16, column 2, paragraph 1 - "As such, many demographers have suggested the importance of a new social compact between the retirees and young immigrants who, together, will characterize a large portion of the region's future population." Explain 'social compact'. 18. p. 17, column 1, paragraph 2 - "...cohort of Millennials – the generation born between years 1982 and 1996." Ensure consistency across reports of Millennial cohort. This definition is different than other sources. 19. p. 17, column 1, paragraph 2 - "Thus, as the economy improves and Millennials age, we must be aware that their current arrangements and preferences may have been a temporary delay rather than a lasting characteristic." 20. p. 18, column 2, paragraph 1 - "Indeed, disruption by some technological platforms has caused serious concerns over displacing workers from stable, full-time jobs or from work altogether—a concern that is heightened when the productivity gains are concentrated in the hands of a very few." Explain who are the 'few' (people instead of with companies, owners, stockholders?) and how 'productivity gains' are concentrated with the 'few'. 21. p. 19, column 1, paragraph 2 - "In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere." Delete as UBI is not under purview of SCAG or RTP. 22. p. 20, column 2, paragraph 3 - "...Four additional cities have incorporated since 2006..." Name the cities that were incorporated. 23. p. 20, column 2, paragraph 3 - "Examining median commute distances for residents of these areas before and after the housing boom shows a sharp uptick for all jobs by over 20 percent when comparing 2002 to 2012, which then holds steady from 2012 to 2016 (as displayed in the Environmental Justice Technical Report)." Sentence meaning is unclear. Reword.	16. Added. 17. Modified. 18. Verified; 1981-1996 used following Dimock (2019) reference in Demographics & Growth Forecast Technical Report. 19. Noted. 20. Updated. 21. UBI discussion reviewed. SCAG's long-range visioning necessitates discussions of trends related to income, workforce trends, and life outcomes thus discussion of UBI is merited. Language modified to reflect policy neutrality. 22. Added. 23. Clarified.

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001560 Related Documents Link
0001560.09	<p>24. p. 21, column 2, paragraph 1 - “ There has been an acceleration in new units since the Great Recession that has been characterized by a higher share of multi-family units For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production...”Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed. 25. p. 22, Table 2.1 -Add definitions of all types of PGAs.Verify values as the majority of Share of Total Growth (2008-2016) do not match what is presented in the Demographics and Growth Forecast Technical Report.26. p. 23, column 1, paragraph 2 - “Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas.”Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.27. p. 29, Table 2.2 - Add note that includes the types of ‘non-motorized’, e.g., walking, biking, scooter...28. p. 29, Table 2.3 - Indicate which quintile is high or low.Add note that includes the types of ‘non-motorized’, e.g., walking, biking, scooter...29. p. 30, graphic - Include definition on the page of ‘on-call’.30. p. 31 - Include definition on the page of - Principal arterial roadways- Class 1 Railroads 31. p. 32, column 1, paragraph 3 - “...environmental litigation, community resistance to all kinds of housing projects, and lack of sufficient state, federal, and local funding mechanisms.”Resistance is not limited to only higher-density housing projects.32. p. 32, column 1, paragraph 4 - “Additionally, population and employment growth in metropolitan areas in California has slowed in recent years because wages cannot compensate for the high cost of housing.”Cite the study this comes from to document the connection. This should not be assumed as there are other influences: cost of living, regulations, taxes...33. p. 33, graphic - “...environmental litigation, community resistance to all kinds of housing projects, and lack of sufficient local funding mechanisms and lack of sufficient state, federal, and local funding mechanisms.”34. p. 36, Table 2.4 - Add original source.Data is stored in SCAG SPM, it is not generated by SPM.</p>	<p>24. Modified. 25. Updated. 26. Updated. 27. Table updated. 28. Table updated. 29. Verified. 30. Verified. 31. Clarified/added. 32. Reference added. 33. Clarified. 34. Reference added.</p>
0001560.10	<p>35. p. 36, column 2, paragraph 3 - “All demographic groups are affected. ”Delete dramatic text.36. p. 38, column 2, paragraph 1 - “The way a community is designed impacts the likelihood that a person will bike or walk to school, work, or local shops; have access to healthy food or parks; and breathe air that has minimal pollutants.”It is not possible for outdoor air to be free of pollutants.37. p. 39, graphic - “If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.”What about high capacity arterials like HQTAs or railines? Why are these not included?38. p. 40, Figure 2.5 - Stacked bar chart with percentages for each category would be more informative.39. p. 41, column 1, paragraph 1 - “Additional factors impacting congestion on roadways and transit accessibility are natural impediments, such as mountains and waterways, outdated road technology and other challenges.” Explain how mountains and waterways impact congestion.Clarify what is “outdated road technology”.</p>	<p>35. Modified. 36. Comment noted. 37. Comment noted. 38. Graphic reviewed. 39. Clarified.</p>

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001560 Related Documents Link
0001560.11	<p>40. p. 46, column 2, paragraph 2 - "This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals set by the Regional Council."41. p. 47, column 2, paragraph 1 - "KEY CONNECTIONS... ..meet increasingly-aggressive greenhouse gas reduction goals set by the state."42. p. 48, column 1, paragraph 4 - "CORE VISION SUSTAINABLE DEVELOPMENT Studies and partnerships to establish a Regional Advanced Mitigation Program (RAMP) will also be pursued to preserve habitat."Add definition here of RAMP.43. p. 48, column 2, paragraph 3 - "...Connect SoCal can reach the regional target of reducing greenhouse gases..."44. p. 49, column 1, bullet 2 - "Focus on a regional jobs/housing balance to reduce commute times and distances and ..."45. p. 50, column 1, paragraph 1 - "Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, known as "Spheres of Influence," where feasible."46. p. 50, column 2, paragraph 4 - "Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth."</p> <p>47. p. 50, column 2, paragraph 4 - "SCAG's methodology to identify Job Centers is not final and additional potential centers can be identified." 48. p. 55, column 1, paragraph 1 - "These strategies were identified with guidance from stakeholders as high priorities for..." Define who the stakeholders are.49. p. 56, paragraph 1 - "The extraordinary cost of producing housing in California is a significant barrier..."50. p. 56, paragraph 1 - "The Regional Housing Supportive Infrastructure strategy will help make it quicker for developers to produce critically-needed housing." Local jurisdictions don't build housing.51. Clarificationp. 56"Placentia Enhanced Infrastructure Financing District (EIFD) ... water infrastructure improvements through value capture..." Explain what 'value capture' is.</p>	Comments noted. Edits have been made to provide clarifications in Chapter 3 of Connect SoCal.
0001560.12	52. Clarificationp. 60, column 2, paragraph 3"SCAG examined the potential application of cordon/area pricing in Southern California through its Mobility Go Zone and Pricing Feasibility Study. The study showed that a Westside Go Zone would ... generating a net average of \$69.2 million annually in revenues, which would go directly toward transportation improvements, pedestrian amenities and economic development."How would that money be collected?53. ClarificationGeneral Comment, p.61, 102"A mileage-based system."For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.54. Clarification p. 64, column 1, paragraph 1"Connect SoCal identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."	Thank you for your comments. SCAG has incorporated your clarifications where appropriate.Proposed methods for collecting fees implemented through Go Zones are discussed further in SCAG's Go Zone Report.
0001560.13	55.Clarification p. 67 mapAdjust line thickness and layer order so all modes can be seen even if same routes are followed.	Comment noted and will be considered to make exhibits legible within space and scale constraints.
0001560.14	56.Correction p. 77, Table 3.2, line 2"Add I-405 ExpressLanes from I-110 to LA/Orange Country Line."	Comment noted. Changes have been made in the Final Connect SoCal.

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0001560.15	57. Clarification p. 78, column 2, paragraph 1“...Connect SoCal supports regional programs that raise awareness of the issue, reposition the image of goods movement jobs to reflect career mobility...”Reword ‘reposition the image’.58. Clarificationp. 80, column 1, paragraph 6“Expansion of the international port of entry (POE) in Calexico.”Add POE to glossary.	1. The phrase has been clarified. 2. Port-of-Entry (POE) has been added to the glossary.
0001560.16	59. Clarification p. 81, column 2, paragraph 1“SCAG will continue a collaborative planning approach.”60. Clarification p. 81, Table 3.3List full name of Airports and ID in parentheses. Add “In Millions” to the Projections column.Add source.	Comment noted. The sentence in the “Effective Analysis and Planning” subsection, column 2, paragraph 1, will be changed to read “...SCAG will continue a comprehensive and collaborative planning approach by working with the airports, transportation commissions and agencies, state agencies, federal agencies, and other aviation and transportation stakeholders.” “In Millions” will be added to the Projections column of Table 3.3. Furthermore, the following footnote will be added to Table 3.3.: "Please refer to the Aviation and Airport Ground Access Technical Report. The Commercial Service Airports in the SCAG Region (FAA Code) section and Table 3: General Aviation and Reliever Airports in the SCAG Region, will provide the airport names associated with the FAA airport codes. The airport activity numbers for 2017 and the airport forecast numbers for 2045 were obtained from the airports."
0001560.17	61. Correctionp. 83, column 1, paragraph 2“...in the previously conducted 2016 RTP/SCS...”62. Clarificationp. 83, column 1, paragraph 3, last line“...Nevertheless, the implementation of Plan programs, policies and strategies may lead to additional environmental impacts compared to existing conditions.”63. Clarificationp. 83, column 1, paragraph 3“Project level mitigation measures have been identified that “can and should where applicable and feasible” be undertaken by lead agencies that implement transportation projects...”	Suggested changes will be considered in the Final Connect SoCal.
0001560.18	64. ClarificationExhibit 3.4Add definitions on map of Job Centers, Neighborhood Mobility Areas and High Quality Transit Areas.65. ClarificationExhibit 3.6Specify on map what year the Job Centers represent.Cite Kevin Kane’s report for background on job centers.66. ClarificationExhibit 3.7Ensure entire note at bottom is displayed.67. ClarificationExhibit 3.9Specify on map what year the NMAs represent.Explain z-scores on the ma p.68. ClarificationExhibit 3.10Specify on map what year the Livable Corridors represent.Provide definition of Livable Corridors on ma p.	Comments noted. Exhibits in Connect SoCal have been updated.

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001560 Related Documents Link
0001560.19	<p>69. Clarification p. 96, column 1, paragraph 1“...this chapter and a more detailed Technical Report ...”Specify which technical report is referred to.70. Clarification p. 98, all FiguresUsed dashed and dotted lines to differentiate between colors in black and white and for color-blind readers.71. Clarification p. 103, Tables 4.2 and 4.3Table 4.2 Specify in title if dollars are for the life of the Plan.Cite sources for both tables.72. Define p. 104, column 1, top bullet“Promote national and state programs that include return-to-source guarantees, while maintaining flexibility to reward regions that continue to commit substantial local resources”Define ‘regions’ in the bullet in this context.73. Clarification p. 105, all FiguresIndicate for all figures if these are for the life of the Plan.74. p. 107, Table 4.4 third row“User fees on TNC mileage —estimated at about \$0.05 (in 2019 dollars) per mile starting in 2021.”Clarify if these fees would be on top of the proposed, general mileage-based user fee for all users that would replace the gas tax.75. p. 108, Table 4.5.1 first row“Locally imposed ½ percent sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two ½ percent sales taxes)...”76. p. 108, Table 4.5.1 second row“The Local Transportation Fund (LTF) is derived from a ¼ percent sales tax on ...”77. p. 108, Table 4.5.1 fifth row“...fees from the Transportation Corridor Agencies (TCA) ...”78. p. 111, Table 4.5.4 second rowIndicate if the mileage-based user fee would be inflation adjusted.79. p. 112, Table 4.6.1 Include source for table.80. p. 118, column 2, bullet 7“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.” 81. p. 121-122, graphicsAdd sources to data.82. p. 123, Table 5.1Change “Trend” column header to “Outcome”. “Trend” is a term used in the PEIR and has different meaning than used here.</p>	Thank you for your comments. SCAG has incorporated your clarifications where appropriate.

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001560 Related Documents Link
0001560.20	<p>83. Clarification p. 128, column 1, paragraph 2“...is projected to increase by 9.5 percentage points between the Baseline (44.6 percent) and Connect SoCal (54.1 percent).”84. Clarification p. 128, column 1, paragraph 3“...to increase by 24.3 percentage points between the Baseline...”85. Clarification p. 129-133, figuresAdd sources to all figures.86. p. 132, column 2, paragraph 2“Connect SoCal seeks to improve the integration of transportation and land use planning and recognizes that our regional multimodal transportation system generates a wide range of impacts that significantly affect public health and quality of life.”87. p. 135, column 1, paragraph 1“The user benefits are estimated using the Cal-B/C framework and incorporate SCAG RTDM outputs.”Explain in text Cal-B/C and RTDM.88. p. 135, column 2, paragraph 2“Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.” 89. p. 140, column 1, paragraph 2“Environmental Justice (EJ) is a federal and state mandate designed to help ensure social equity in the transportation planning and decision-making process, with the goal of protecting minority and low-income communities from receiving a disproportionate share of adverse impacts produced by regional transportation projects and plans.”90. p. 144, column 2, paragraph 2“With Connect SoCal, the share of households in HQTAs increases nearly ten percentage points to 54 percent.”</p>	Thank you for taking the time to review and comment on the draft Connect SoCal. Your suggested edits for the ‘Measuring Our Progress’ chapter will be reviewed and incorporated into the Final Connect SoCal as appropriate.
<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001561 Related Documents Link
0001561.01	<p>91. Clarification p. 151, column 1, paragraph 3“These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.”What is the Regional Housing Strategy Framework?How much money will be provided to jurisdictions?Will the funding distribution methodology be consistent with the RHNA distribution methodology?</p>	The Regional Housing Strategy Framework has not yet been developed so specific details are forthcoming. Generally, the Framework will help to steer the resources provided through Assembly Bill 101.

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001561 Related Documents Link
0001561.02	<p>Glossary 92. Clarification p. 159, glossary“Gentrification, While holding many definitions, is commonly understood as a change process in historically low- income communities ...”</p> <p>93. Correction p. 163, glossary“Measure A Revenues generated from Riverside County’s local half-percent sales tax. Measure D Revenues generated from Imperial County’s local half-percent sales tax. Measure I Revenues generated from San Bernardino County’s local half-percent sales tax. Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018. Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...” 94. Correction p. 166, glossary“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...” 95. Clarification p. 167, glossary“RHNA Regional Housing Needs Assessment – Quantifies the need for housing within each jurisdiction of the SCAG region based on population growth projections and other items as determined by the MPO. Jurisdictions then address this need through the process of completing the housing elements of their General Plans.” 96. Clarification p. 173, glossary“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.” Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>	Thank you for your comments. SCAG will take your comments into consideration.

ID	Comment	Response
<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001561 Related Documents Link
0001561.03	<p>1. General Comment All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular reference items and the maps need to be standalone documents. Where possible, also include SCAG’s logo.</p> <p>2. General Comment All maps with growth forecast or development types Add: “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</p> <p>3. Clarification P. 2, column 1, paragraph 1 “...trends that have already been seen during the recovery from the Great Recession, but which differ from the historical arc of development in Southern California.” Reword “historical arc”</p> <p>4. Clarification P. 3, column 2, paragraph 2 “Between October 2018 and February 2019, SCAG reviewed and aggregated feedback on the growth forecast and other data map book elements. This aggregated feedback from local jurisdictions is known as the “local input” growth forecast. The local input growth forecast was evaluated at the county and regional level for the base year of 2016 and the horizon year of 2045. Findings included:</p> <p>5. Clarification P. 3, column 2, paragraph 3 “At the regional level, the 2045 local input forecast was found to be within the high/low scenario ranges .”</p> <p>6. Clarification P. 5, column 2, paragraph 2 “Unauthorized immigration has decreased notably in the SCAG region, with a Pew Research Foundation analysis of Census Bureau data showing a 24.6 percent decrease in the unauthorized immigrant population in the SCAG region 2006 and 2017 (Passel and Cohn 2019).” Clarify if there was a decrease in number of migrants or of the total immigrant population.</p>	<p>1. Map labeling has been improved. 2. Language regarding appropriate spatial scale has been added to maps in the Demographics and Growth Forecast Technical Report.</p> <p>3. Changed. 4. Changed. 5. Reviewed. 6. Clarified.</p>

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001561 Related Documents Link
0001561.04	<p>7. Clarification p. 6, column 1, paragraph 2“... having fewer than half as many working-age adults per senior may disproportionately impact seniors who do not have sufficient retirement savings as this can place additional stress on social services provision.”Clarify what social services provisions are. 8. Define p. 8, column 1, paragraph 1“Of particular interest are educational attainment rates since annual incomes do not necessarily predict human capital or lifetime earning potential.”Define/clarify human capital. 9. Clarification p. 8, column 2, bullet 3“...suggesting that the region’s “brain gain” is due to people coming to the region from further away.”Clarify/reword: further away from what?10. Clarification p. 10, figures 4 & 5Add sources. 11. Clarification p. 10, column 2, paragraph 1“However, many Millennials entered the workforce during the depths of the Great Recession, which had the additional impact of decreasing housing construction since they didn’t have the income needed to form households or purchase homes as much as previous generations had during their twenties.”Non sequitur. Reword sentence. 12. Clarification p. 18, column 1, paragraph 1“In addition to concerns over the polarizing wage structure of work,”Replace ‘polarizing’ or reword. 13. Define p. 18, column 1, paragraph 2“Food preparation and sales as well as social service and office support each employ over 1. 2 million in the region and have consensus automation potentials...:Define ‘consensus automation’. 14. Clarification p. 19, column 1, paragraph 2“SPECIAL FOCUS: INTEGRATING GROWTH INTO A MATURE REGIONThe region has experienced slow but consistent population growth since 2000 at a rate of 0. 82 percent. Household growth was slightly slower at 0. 73 percent, and job growth, reflecting both a recession and recovery, was similar at 0. 77 percent.”Clarify if the growth is annual or total. 15. Clarification p. 20, column 2, paragraph 3“REGIONAL GROWTH FORECAST METHODOLOGYSCAG initially sets a range of regional growth forecasts of employment, population, and households in this order to address the uncertainty of a certain set of growth forecasts.”Clarify what set of growth forecasts.</p>	<p>7. Clarified. 8. Clarified in earlier paragraph. 9. Changed. 10. Sources added. 11.Rephrased. 12.Rephrased. 13.Term removed for clarity. 14.Revised. 15.Clarified.</p>
0001561.05	<p>16. ClarificationP. 23, column 2, paragraph 4“DEVELOPMENT OF MAJOR VARIABLES SCAG develops the TAZ-level socioeconomic data using an array of public and private sources of data listed above and advanced estimation methods. The initial TAZ-level household projection starts from the household and employment at the Minimum Planning Unit (MPU) level within each TAZ. The MPU is the smallest computing unit at which calculation can take place. In general, MPUs are equivalent to parcels and can be matched to county assessor parcel databases. Additional variables at the zonal level include school enrollment, household income, and disaggregated employment categories for 4,109 Tier 1 TAZs and 11,267 smaller Tier 2 TAZs (TABLE 11).”Reorder sentences.17. DefineP. 24, column 2, paragraph 1“Household sample weights from the PUMS are adjusted to match the various controls provided externally and at the TAZ level.”Define what the external controls are.18. ClarificationP. 31, column 1, paragraph 2“Younger people are more likely to live in larger households while households headed by Hispanic or non-Hispanic Asian/Other individuals tend to be larger as well, suggesting a greater preference for multi-generational living.” Multi-generational living may be a necessity rather than a preference. Reword.19. ClarificationP. 43, column 2, paragraph 2“Recent trends suggest that areas within the region which have benefits for transportation and environmental goals such as infill land, job centers and high quality transit areas are already receiving a disproportionate amount of growth.”Rework sentence.</p>	<p>16.Changed 17.Changed from “preference” to “prevalence.” 18. Rephrased.</p>

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001561 Related Documents Link
0001561.06	<p>1. Clarification p. 6, column 2, paragraph 2 “There is a large body of literature that discusses the link between active transportation and physical activity (e.g. Boarnet, Greenwald, and McMillan, 2008),...” 2. Define p. 11, column 2, paragraph 4 “Increases in economic competitiveness, efficiency and amenity from completion of the projects and operations, averaging an additional 195,500 jobs per year.” Define/clarify ‘amenity’</p>	Changes addressed in the Final Connect SoCal.
0001561.07	<p>1. General Comment All maps All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular reference items and the maps need to be standalone documents. Where possible, also include SCAG’s logo. 2. General Comment All Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities. 3. Correction p. 4, column 1, paragraph 3 “For this reason, SCAG works collaboratively with its many local partners to support all jurisdictions in implementing the SCS.” 4. Correction p. 4, column 2, paragraph 3 “Many jurisdictions within the SCAG region...” 5. Correction p. 4, column 2, paragraph 3 “This is evident in that requests for support, funding, and resources...” 6. Clarification p. 8 column 1, top of page “However, single-family development remains prevalent in more suburban parts of the region, especially in Riverside County.” Clarify if this applies to only Riverside or to other counties as well. 7. Define p. 14 column 1, last paragraph “HQTAs feature frequent transit service or major transit stations and are located in communities throughout the SCAG region.” Define/explain ‘frequent transit service’. 8. Clarification p. 15 column 1, last sentence “For transportation, this future includes the projects planned by each County Transportation...” 9. Correction p. 16-18, Figures 2,3,4 Delete Figures 2,3, & 4. These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options. 10. Clarification p. 16 column 2, bullet list Add “See page 31 for definitions”. 11. Clarification p. 16 column 2, paragraph 1 “For longer commutes residents will have more incentive to carpool or vanpool thanks to programs offered by your employer.” Clarify where the funding comes from for these programs and if they are required or voluntary.</p>	Comments noted. The Sustainable Communities Strategy Technical Report has been updated to reflect requested edits where needed. Please see the Congestion Management Technical Report for details on Transportation Demand Management (Comment #11).

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<i>Submitted by</i>	Center for Demographic Research, Cal State Fullerton	Submittal 0001561 Related Documents Link
0001561.08	<p>12. Clarification p. 16 column 2, paragraph 1 “For those that choose to drive hot-spots of congestion will be quicker to move through due to cordon pricing and using an electric vehicle will be easier thanks to an expanded regional charging network. ”Clarify how the expanded regional charging network will be paid for. 13. Clarification p. 16 column 2, paragraph 2 “In this future, more funding is available to invest in expanded bus and rail networks...”Clarify where the funding comes from for these programs. 14. Clarification p. 16 column 2, paragraph 2 “More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible. ”Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with. 15. Define p. 19 table &Other references to housing typesPlease define single-family and multi-family. For SCAG modeling purposes, single-family is short hand for only single-family detached and multi-family includes attached single-family homes (townhomes & row houses) along with apartments and other attached units. 16. Clarification p. 20 table Clarify if the transportation costs and utility costs are per household, annually or over the lifetime of the plan. 17. Define p. 21 table Define ‘Carbon Stock’, ‘High Species Movement’ and ‘Habitat Degraded’ 18. Clarification p. 22 column 2, paragraph 2 “...requires significant capital investments to extend or build new local roads, electric, water and sewer systems, and parks. ”19. Clarification p. 22 column 2, paragraph 2 “Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing. ”Add: But, infrastructure capacity, services, and other amenities need to be evaluated to determine if additional growth will exceed capacity and would then require expansion of existing infrastructure, services, or other amenities. 20. Clarification p. 22 column 2, paragraph 2 “More dispersed development, which requires greater lengths of roads and utility conduits...”21. Clarification p. 25 column 1, paragraph 1 “Assuming the same efficiency standards,...”Clarify what efficiency standards or as of when.</p>	Comments noted. The Sustainable Communities Strategy Technical Report has been updated to add further clarity where possible.

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<p><i>Submitted by</i> Center for Demographic Research, Cal State Fullerton Submittal 0001561 Related Documents Link</p>		
0001561.09	<p>22. Clarification p. 25 column 1, paragraph 2 “Therefore, a development type pattern with a greater proportion of standard suburban development, which includes more large-lot single-family homes...” Insert size of large-lot homes for reference. 23. Clarification p. 25 column 2, paragraph 1 “With the implementation of Connect SoCal, the region will save \$370 million on health direct health care expenditures through built environment investments in the plan, and \$115 million indirectly through gains in productivity from a healthier workforce.” Clarify if these numbers are annual or for the lifespan of the Plan. 24. Clarification p. 29 column 1, paragraph 2 “...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” where feasible.” 25. Define p. 30 column 1, paragraph 2 “It is also important to identify infrastructure installation sites on public and private property based on latent demand,” Define ‘latent demand’. 26. Clarification p. 31 column 1, last bullet “And finally, within spheres of influence, where feasible” 27. Clarification p. 31 column 1, last bullet “And finally, within spheres of influence, where feasible” 28. Clarification p. 32 column 1, paragraph 3 SCENARIO DEVELOPMENT GROWTH CONSTRAINTS “The variable constraints reflect goals of Connect SoCal and were only used when there was room for growth in the rest of the jurisdiction’s general plan capacity.” 29. Clarification p. 35 column 1, paragraph 3 SCENARIO PLANNING MODEL “Starting with the 2016 RTP/SCS, SPM-SD has been used in providing directional and order-of-magnitude regional impacts of local land use and policy decisions...” 30. Clarification p. 35 column 2, paragraph 1 “SPM normalized all five forecast growth allocations made at the Tier 2 Transportation Analysis Zone (TAZ) scale to a standardized data framework and analyzed using the model’s analytic modules.” Explain ‘normalized’. 31. Clarification p. 36 column 2, paragraph 2 “Step 4. Estimate building square feet...” Clarify what conversions/calculations were made for employees/sq. feet. 32. Define p. 36 column 2, paragraph 4 Step 6. Estimate outdoor irrigated area... Commercial irrigated area was calculated by utilizing the place type look-up of irrigated area per employee multiplied by the number of employees at the SPZ scale.” Define ‘place type look-up’.</p>	<p>Comments noted. The Sustainable Communities Strategy Technical Report has been updated to add further clarity where possible.</p>
<p>0001561.10 33. Clarification p. 34 Table Add source. Explain commercial section numbers. Again, we thank you for your time and consideration of the comments above. Comments noted. The Sustainable Communities Strategy Technical Report has been updated to add further clarity.</p>		
<p><i>Submitted by</i> City of California City Submittal 0001434 Related Documents Link</p>		
0001434.01	<p>I would like to see more information and studies on interregional travel. Specifically between SCAG and San Diego County, Kern County, and Santa Barbra County. As you know, travel sheds and commute patterns do not stop at region boundaries. Interregional communication is key for Southern California’s success.</p>	<p>Comment noted. We encourage you to raise this issue as part of the next RTP/SCS update process.</p>
<p><i>Submitted by</i> City of Corona, Councilmember Submittal 0001396 Related Documents</p>		
0001396.01	<p>Why is there no funding or consideration for moving jobs to the IE all while ignoring our transportation woes. This focus on building 1.2M homes without any thought to what will be built first/cheapest is doubling done on the mistakes of the past that include building homes for 500,000 more people that live off I-15 with not one mile of additional lanes on I-15. We all know cheaper housing will be built first and at a great pace.</p>	<p>SCAG holds an annual Economic Summit to encourage job creation in our region including the Inland Empire. In addition, job creation strategies are discussed in SCAG’s Community, Economic and Human Development (CEHD) Policy Committee as well. We suggest providing input to the CEHD committee regarding ideas for moving jobs to the Inland Empire.</p>

ID	Comment	Response
<p><i>Submitted by</i> City of Costa Mesa Submittal 0001527 Related Documents Link</p>		
0001527.01	<p>Dear Connect SoCal Team:The City of Costa Mesa appreciates the time and effort undertaken by the Southern California Association of Governments (SCAG) staff in its efforts to develop a RTP/SCS of our large and diverse metropolitan planning area. The City of Costa Mesa remains committed to doing its fair share in addressing regional issues and appreciate the comment and review period provided by SCAG for the Connect SoCal Plan and its associated PEIR.</p>	<p>Thank you for your comments on the Draft Connect SoCal and associated PEIR. Comment noted. For responses related to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001527.02	<p>The City would like to express its support of recommendations and comments submitted by the Orange County Council of Governments, Orange County Transportation Authority, and Center for Demographic Research. We strongly recommend that all comments and concerns from these bodies be implemented into the Connect SoCal Plan and the associated PEIR.</p>	<p>Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10, Corrections and Additions, of the Final Connect SoCal PEIR.</p>
<p><i>Submitted by</i> City of Huntington Beach Submittal 0001393 Related Documents Link</p>		
0001393.01	<p>Thank you for the opportunity to submit comments on the Draft Connect SoCal plan and Program EIR. The City of Huntington Beach appreciates SCAG's public outreach efforts for this process and offers the following comments and concerns for your consideration.</p>	<p>Thank you for your comments on the Draft Connect SoCal and associated PEIR.</p>
0001393.02	<p>High Quality Transit Areas (HQTAs). HQTAs are defined as "corridors that have at least a fifteen minute headway (time in between the next scheduled service) during peak hours bus service." According to RTP/SCS maps, all of Beach Boulevard within the City of Huntington Beach is defined as a HQTA. However, based on the October 13, 2019 Orange County Transportation Authority (OCTA) Bus Schedule 1, there are no bus stops on Beach Boulevard within the City of Huntington Beach with headway times of 15 minutes or less. Route 29 services Beach Boulevard from the City of La Habra to PCH in Huntington Beach. The shortest headway time during peak hours for bus service is on the Route 29 stop at PCH/1 51 Street (not a stop on Beach Boulevard) traveling southbound with an average headway time of 18.23 minutes during the PM peak hours. Most stops have an average peak hour headway time of approximately 19-25 minutes. Some stops, such as the Beach Boulevard/Talbert Avenue stop, have peak hour headway times of 40-49 minutes. One stop (Beach Boulevard/Atlanta Avenue) did not list any stop times as part of any route for this stop. It must also be noted that OCTA eliminated Route 211 in October 2019, which serviced Huntington Beach to Irvine (a major Orange County job center) due to low ridership.Further, OCTA's 2018 Long Range Transportation Plan (LRTP)2 includes Figure 4.1 - Local, Community, and Bravo! Final Route Recommendations. This figure recommends that Route 29 receive a reduction in frequency of service. This will add further delay to the 19-25 minute average peak hour headway service times on Beach Boulevard.</p>	<p>SCAG worked closely with the Orange County Transportation Authority (OCTA) to identify the high quality transit corridors (HQTAs) in Orange County which form the basis for high quality transit areas (HQTAs). SCAG and OCTA together identified the Beach Blvd corridor, including the entire alignment within the City of Huntington Beach, as both an existing and future HQTAs. See Figure 4.10 in OCTA's 2018 Long Range Transportation Plan.The nature of bus services is that routes and service frequency can change periodically, thus a County Transportation Commission's (CTC) estimate of future transit service frequency is the best estimate available at a given point in time. For the 6th cycle of RHNA, SCAG is assigning a portion of housing unit need on the basis of 2045 HQTAs. These HQTAs will be consistent with those developed for Connect SoCal. CTCs including OCTA have provided SCAG with the most likely future service scenario in order to assist with our long-range planning efforts.</p>

ID	Comment	Response
<i>Submitted by</i>	City of Huntington Beach	Submittal 0001393 Related Documents Link
0001393.03	<p>The Connect SoCal Plan and PEIR must utilize practical application of HQTAs as they operate and are planned for in order to implement the statute objectives of the RTP/SCS, including promoting an improved intraregional relationship between jobs and housing. The City of Huntington Beach recommends revising the HQTAs throughout Connect SoCal and the PEIR to accurately reflect available data regarding actual bus service and planned bus service on Beach Boulevard. Based on SCAG's definition of a HQTA, the entire length of Beach Boulevard in Huntington Beach does not qualify as a HQTA and must be adjusted accordingly.</p>	<p>SCAG worked closely with the Orange County Transportation Authority (OCTA) to identify the high quality transit corridors (HQTCS) in Orange County which form the basis for high quality transit areas (HQTAs). SCAG and OCTA together identified the Beach Blvd corridor, including the entire alignment within the City of Huntington Beach, as both an existing and future HQTC. See Figure 4.10 in OCTA's 2018 Long Range Transportation Plan. The nature of bus services is that routes and service frequency can change periodically, thus a County Transportation Commission's (CTC) estimate of future transit service frequency is the best estimate available at a given point in time. For the 6th cycle of RHNA, SCAG is assigning a portion of housing unit need on the basis of 2045 HQTAs. These HQTAs will be consistent with those developed for Connect SoCal. CTCs including OCTA have provided SCAG with the most likely future service scenario in order to assist with our long-range planning efforts. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10, Corrections and Additions, of the Final Connect SoCal PEIR.</p>
0001393.04.1	<p>The Connect SoCal Plan and PEIR also include other transportation related errors in Orange County, as identified by comments made by OCTA. The City of Huntington Beach expresses support for OCTA's comments as they pertain to errors and inconsistencies between the existing and planned Orange County transportation network and the RTP/SCS and PEIR. For example, the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, 1-605, or north of 1-605 on 1-405 as depicted in the proposed regional express lanes network. The potential regional express lane network is currently subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.</p>	<p>SCAG, in partnership with the California Department of Transportation (Caltrans), the Federal Highway Administration (FHWA), the Los Angeles County Metropolitan Transportation Authority (Metro), the Orange County Transportation Authority (OCTA), the San Bernardino Associated Governments (SANBAG), and the Riverside County Transportation Commission (RCTC) collaborated on the development of a regional concept of operations for a regional express lane network. The Concept of Operations provides a blueprint for a regional express lane network that integrates express lane facilities into a regional system with consistent or compatible operating, design and policy rules. This development process also resulted in the recommended regional express lane network included in the adopted 2016 RTP/SCS and the Final Connect SoCal. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10, Corrections and Additions, of the Final Connect SoCal PEIR.</p>
0001393.04.2	<p>Additionally, Connect SoCal regional strategies rely on improvements beyond the projects submitted by OCTA, and implementation of the strategies is subject to availability of new revenue sources, necessary project development, and review processes by the implementing agencies.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	City of Huntington Beach	Submittal 0001393 Related Documents Link
0001393.05	<p>RHNA Growth Exceeds General Plan Growth. Section 3.14- Population and Housing of the Connect SoCal PEIR includes four guiding principles related to Growth Forecasts approved by SCAG's Regional Council on August 1, 2019: Principle #1: The draft plan forecast for Connect SoCal shall be adopted by the Regional Council at the jurisdictional level, thus directly reflecting the employment, population and household growth projections derived from local input and previously reviewed and approved by SCAG's local jurisdictions. The draft plan growth forecast maintains these projected jurisdictional growth totals, meaning further growth is not reallocated from one local jurisdiction to another. Principle #2: The draft plan forecast at the Transportation Analysis Zone (TAZ) level is controlled to be within the density ranges of local general plans or input received from local jurisdictional in this most recent round of review. Principle #3: For the purpose of determining consistency for California Environmental Quality Act (CEQA) streamlining, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the Plan. Principle #4: TAZ level data or any data at a geography smaller than the jurisdiction is included in the draft plan forecast only to conduct the required modeling analytical work and is therefore, only advisory and non-binding as SCAG's sub-jurisdictional forecasts are not formally adopted as part of the Plan. The SCAG RHNA methodology is inconsistent with Principle #1 and #2. The currently proposed draft 6th Cycle RHNA methodology reallocates "residual" existing need across jurisdictions within the same county. The reallocation is assigned to jurisdictions based on transit accessibility (50%) and job accessibility (50%), and excludes Disadvantaged Community jurisdictions which have over 50% of their populations in very low resource areas using California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Indices.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001393.06	<p>Further, the cumulative impacts of the reallocation, projected need, and existing need result in a total RHNA that exceeds 1.0368 times planned household growth from the SCAG region. While 1.0368 is the overall exceeded household growth in the region, each jurisdiction may be given a RHNA allocation that exceeds their General Plan growth even further as a result of the reallocated "residual" existing need calculation.</p>	<p>Comment noted. See Master Response #1.</p>
0001393.07.1	<p>The PEIR also states that although the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process. The PEIR does not provide any meaningful analysis or supporting evidence to demonstrate how this will be accomplished.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001393.07.2	<p>The currently proposed draft 6th Cycle RHNA methodology which includes reallocated "residual" need and growth exceeding SCAG local jurisdiction General Plan forecasts is not consistent with the goals of Connect SoCal, including the following: Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods Goal 4. Increase person and goods movement and travel choices within the transportation system Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p>See Master Response #1.</p>

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<i>Submitted by</i>	City of Huntington Beach	Submittal 0001393 Related Documents Link
0001393.08	The City of Huntington Beach is unable to accommodate any reallocated growth due to a lack of transportation options, which is not consistent with Connect SoCal Goals 2, 4, or 9. As a result, the SCAG RHNA methodology is wholly inconsistent with Connect SoCal and the PEIR must address this information.	See Master Response 1. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001393.09	Support for Comments and Recommendations Submitted by Other Groups. The City of Huntington Beach expresses support for comments made by OCTA as they pertain to errors and inconsistencies between the existing and planned Orange County transportation network and the RTP/SCS and PEIR, as noted above. The City also expresses support for comments made by the Center for Demographic Research (CDR) and the Orange County Council of Governments (OCCOG). The City would like to highlight the following comments from CDR and OCCOG that are of the highest level of concern:1. SCAG must utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected for the RTP/SCS and PEIR.	Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR. Regarding the projection of future growth, SCAG utilized feedback from jurisdictions and a broad range of stakeholders to develop the Growth Vision strategies and Forecasted Development Pattern for Connect SoCal. Further, in working to finalize the Plan's Forecasted Development Pattern (a reflection of the Growth Vision's strategies and policies), SCAG initiated a peer review with local jurisdictions of population, household, and employment growth at the sub-jurisdictional level (i.e. transportation analysis zone (TAZ) level) prior to the release of the draft Connect SoCal. Focusing on jurisdictions individually, it was evident that many had visions for future development that were a better match with Connect SoCal's Growth Vision of regional policies and strategies. Accordingly, technical refinements were made to the Forecasted Development Pattern in Connect SoCal that included adjustments to growth due to entitlements and maximum planned capacities. "Locally envisioned growth" was used in some instances to further Connect SoCal's Growth Vision of reducing the need for residents to drive by locating housing, jobs and transit closer together - helping to assure that Connect SoCal's land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities. Additional information on the development and future use of the Growth Vision is available in the growth forecast Guiding Principles in the Demographics and Growth Forecast Technical Report.
0001393.10	2. CDR PEIR comments #33, #35, and #54 to add the following text: "SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG's total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG's population projections."	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001393.11	3. CDR RTP/SCS and OCCOG comments which revise text to maintain an objective/unbiased tone, delete sensationalized language, and include meaningful evidence to support generalized claims about the SCAG region.	Proposed suggestions will be considered in the Final Connect SoCal, as appropriate.

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<i>Submitted by</i> City of Huntington Beach Submittal 0001393 Related Documents Link		
0001393.12	<p>4. OCCOG comments to revise the definition of a HQTAs used in the RTP/SCS and RHNA to be consistent with the definition of a HQTAs in SB 375 and the Strategic Growth Council. This is necessary to ensure the SCAG region is able to compete for available funds related to transit-oriented housing.</p>	<p>SCAG's HQTAs are defined consistent with definitions of High-Quality Transit Corridors, major transit stops and transit priority areas (TPAs) as designated by state of California statute (SB 375 and SB 743). The definition of HQTAs will be updated to clarify that freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTAs.</p>
0001393.13	<p>5. OCCOG comments opposing any alternative in the PEIR that does not utilize local input, including the intensified land use alternative. The RHNA must be consistent with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001393.14	<p>6. OCCOG PEIR comments regarding the usage of "can and should" in mitigation measures. Revise all mitigation measures to be "considered where applicable and feasible" to clarify that these mitigation measures are a menu of options and not requirements. Further, any mitigation measure that includes a new fee or tax to be adopted at the jurisdictional level must be revised to clarify that it is an option for implementation and not a requirement. Also clarify whether the assumed revenue from the suggested new fees were included in the financial plan or economic analysis of the RTP/SCS.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001393.15	<p>Conclusion. Thank you for the opportunity to comment on the Draft Connect SoCal plan and Program EIR. The City of Huntington Beach appreciates SCAG's commitment to a fair and transparent process and will continue to be an active participant during the RTP/SCS update and 6th cycle RHNA process.</p>	<p>Comment noted. SCAG sincerely appreciates your participation.</p>

<i>Submitted by</i> City of Indio Submittal 0001554 Related Documents Link		
0001554.01	<p>Thank you for providing the City of Indio's Planning Division the opportunity to review and comment on the draft Connect SoCal plan (also known as the 2020- 2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS). After reviewing the information provided, comments pertaining to the draft Connect SoCal document and draft Program Environmental Impact Reportthe following updates and comments are being provided for consideration:1. General Plan UpdateIn response to Table 3.8-4 California Jurisdiction Addressing Climate Change in the SCAG Region (2019) on the Draft Program EIR we would like to provide and update for the three items that were (IP) In Progress (1) GHG Reduction Plan, (2) Climate Action Plan, and (3) General Plan Policy. On September 18, 2019 the City Council approved the City of Indio 2040 General Plan Update (Resolution No. 101 07) and Climate Action Plan (Resolution No. 10108). The General Plan addresses the mandatory elements required by state law that are Land Use, Housing, Circulation (Mobility), Conservation, Noise, Open Space and Environmental Justice. It also includes optional elements of Community Facilities and Infrastructure, Health and Equity (inclusive of Environmental Justice), Economic Development and Implementation. The Climate Action Plan establishes the City's goals for addressing and implementing measures consisting of policies, programs, and/or plans to achieve emissions reductions that would meet or exceed the established GHG reduction targets. The three items on the table mentioned above can be updated to (A) Adopted with the addition of the General Plan Implementation Measures.</p>	<p>Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10, Corrections and Additions, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	City of Indio	Submittal 0001554 Related Documents Link
0001554.02	<p>Below are current City projects aimed to reduce GHG emissions, encourage active transportation, and integrate shared mobility.II. Multi Modal Hub Feasibility StudyThe City applied to Caltrans for a Sustainable Planning Grant. The grant analyzed and evaluated fifteen (15) sites for a future Multi-Modal Hub site in the City of Indio. Furthermore, in collaboration with RCTC and Caltrans the feasibility study identified the selected site for use for passenger rail services. The passenger rail route is being planned as Special Events Train to operate between Los Angeles Union Station and Indio. The Special Events Train will serve the Coachella Valley Music and Arts Festival and Stagecoach Festival. The feasibility study looks at existing and proposed transportation system to provide multi-modal services such as park-and-ride, transit connections, bikeshare. The study includes site development, management and operations, maintenance, costs and funding. The Multi Modal Hub FeasibilityStudy is planned to be completed and adopted by February 2020.III. Complete Streets PlanThe City of Indio 2040 General Plan's Mobility elements outlines the goals and objectives for the Complete Streets Master Plan . The purpose of the Complete Streets Plan is to enhance connectivity across all travel modes. Although the City of Indio has over 20 miles of existing bikeways and various miles of existing sidewalks, there are still critical connectivity gaps for both bicyclists and pedestrians. As part of this project, transit, bicycle, and pedestrian connectivity improvements identified in the Mobility Element are being reviewed in the Complete Streets Plan to identify remaining connectivitygaps and identify projects to address these gaps. The Complete Streets Master Plan is expected to be completed by early 2020.</p>	Thank you for your comment. Updates provided have been included in the Active Transportation Technical Report. The proposed Coachella Valley Rail service is discussed in the Passenger Rail Technical Report.
<i>Submitted by</i>	City of Irvine	Submittal 0001529 Related Documents Link
0001529.01	<p>The City of Irvine appreciates the opportunity to review and provide comments on Connect SoCal, the Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a significant effort and the City of Irvine 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.</p>	Thank you for your comments on the Draft Connect SoCal and its associated PEIR. Comment noted.
0001529.02	<p>The following general comments and recommendations are offered by the City of Irvine on the 2020 RTP/SCS, associated appendices, and PEIR. In support of this letter, please find attached more specific detailed comments from the City of Irvine that are consistent with the comments provided by the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University Fullerton. The City of Irvine requests that this letter and all of its attachments be included in the public record as our collective comments on the 2020 RTP/SCS, PEiR, all associated appendices and documents, and online inventory of maps.1. The City of Irvine concurs with the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University FullertonThe City of Irvine concurs with the comments SCAG will receive from the OCCOG and the CDR. The City requests that SCAG respond to all of the comments detailed in the OCCOG and CDR letters and to act upon any changes advocated by OCCOG, of which the City is a member agency.</p>	Comment noted. Proposed revisions will be considered in the Final Connect SoCal. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments,

ID	Comment	Response
<i>Submitted by</i>	City of Irvine	Submittal 0001529 Related Documents Link
0001529.03	The City of Irvine greatly appreciates the close coordination between SCAG and CDR on behalf of the City of Irvine to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; projects recently completed or under construction; open space; and general plan densities.	Thank you. SCAG also values its close working relationship with CDR and the City of Irvine.
0001529.04	Additionally, the City of Irvine supports a growth forecast that is adopted at a geographic level no lower than the jurisdictional level. The City of Irvine provided SCAG with a detailed and accurate land use data set and growth forecast during its eighteen (18) month Bottom-Up Local Input and Envisioning Process and through the submission of the 2018 Orange County Projections (OCP-2018) data set.	Thank you for your comment. The Growth Forecast Guiding Principles, found in the Demographics and Growth Forecast Technical Report (page 27) indicate that the forecast will be adopted at the jurisdictional level, and not at any smaller levels. In working to finalize the plan's Forecasted Development Pattern (a reflection of the Growth Vision policies and strategies), SCAG initiated a peer review with local jurisdictions of population, household, and employment growth at the sub-jurisdictional level (i.e. transportation analysis zone (TAZ) level) prior to the release of the draft Connect SoCal plan. Utilizing this feedback, technical refinements were made to the Forecasted Development Pattern in Connect SoCal that included adjustments to growth due to entitlements and maximum planned capacities (in line with the Growth Forecast Guiding Principles). To ensure transparency during the process to finalize the Forecasted Development Pattern for Connect SoCal, SCAG emailed a letter to each jurisdiction starting February 21 that included a detailed methodology document for SCAG's Growth Vision. Jurisdictions were also given access to their jurisdictional and neighborhood level Forecasted Development Pattern data via SCAG's Scenario Planning Model - Data Management Site. Throughout this effort, SCAG engaged with stakeholders from the Technical Working Group, and also provided an update on the peer review exercise to the Community, Economic, and Human Development Policy Committee.
0001529.05	On December 11, 2019, CDR provided SCAG with the technical corrections to the draft 2020 RTP/SCS growth forecast data set on behalf of the City of Irvine and all other Orange County jurisdictions. The technical corrections ensure the final 2020 RTP/SCS growth forecast accurately reflects entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities. On January 8, 2020, CDR requested, on behalf of the City of Irvine and all other Orange County jurisdictions, a copy of the final draft growth forecast data set to confirm that all the technical corrections have been included in the final 2020 RTP/SCS growth forecast. On January 14, 2020, CDR was informed that SCAG would not provide a copy of the final draft growth forecast to CDR for review until mid February 2020.	Thank you for the City of Irvine's input on the Draft Connect SoCal plan's Growth Vision. Prior to the release of the Draft Connect SoCal, SCAG initiated a peer review with jurisdictions to review the neighborhood level growth projections included in the Plan to ensure that development projects already underway (i.e. entitled projects) were captured in Connect SoCal's Forecasted Development Pattern and that locally planned capacities were adhered to for allocating growth (in line with the Growth Forecast Guiding Principles, as included in the Demographics and Growth Forecast Technical Report). After reviewing this input and finalizing the Connect SoCal Forecasted Development Pattern (a reflection of the Growth Vision strategies and policies), SCAG emailed a letter to each jurisdiction starting February 21 that included a detailed methodology document for SCAG's Growth Vision. Jurisdictions were also given access to their jurisdictional and neighborhood level Forecasted Development Pattern data via SCAG's Scenario Planning Model - Data Management Site. Throughout this effort, SCAG engaged with stakeholders from the Technical Working Group, and also provided an update on the peer review exercise to the Community, Economic, and Human Development Policy Committee.

ID	Comment	Response
<i>Submitted by</i>	City of Irvine	Submittal 0001529 Related Documents Link
0001529.06	It is strongly recommended that SCAG utilize the 2018 Orange County Projections (OGP-2018) data set provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space, development agreements, and entitlements are properly reflected.	Thank you for the City of Irvine's input on the Draft Connect SoCal plan's Growth Vision. SCAG utilized feedback from jurisdictions and a broad range of stakeholders to develop the Growth Vision strategies and Forecasted Development Pattern for Connect SoCal. In working to finalize the plan's Forecasted Development Pattern (a reflection of the Growth Vision's strategies and policies), SCAG initiated a peer review with local jurisdictions of population, household, and employment growth at the sub-jurisdictional level (i.e. transportation analysis zone (TAZ) level) prior to the release of the draft Connect SoCal plan. Focusing on jurisdictions individually, it was evident that many had visions for future development that were a better match with Connect SoCal's Growth Vision of regional policies and strategies. Accordingly, technical refinements were made to the Forecasted Development Pattern in Connect SoCal that included adjustments to growth due to entitlements and maximum planned capacities. "Locally envisioned growth" was used in some instances to further Connect SoCal's Growth Vision of reducing the need for residents to drive by locating housing, jobs and transit closer together - helping to assure that Connect SoCal's land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.
0001529.07	The City of Irvine opposes any alternative in the PEIR that does not utilize local input, or at the very least, the jurisdictional totals provided through the local input process should be used. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative.	Thank you for your comment. The final Connect SoCal and PEIR for Connect SoCal use jurisdictional growth totals which reflect local input in all cases. Please refer to the Guiding Principles for the growth forecast included in the Demographics and Growth Forecast Technical Report. In working to finalize the plan's Forecasted Development Pattern (a reflection of the Growth Vision policies and strategies), SCAG initiated a peer review with local jurisdictions of population, household, and employment growth at the sub-jurisdictional level (i.e. transportation analysis zone (TAZ) level) prior to the release of the draft Connect SoCal. Focusing on jurisdictions individually, it was evident that many had visions for future development that were a better match with Connect SoCal's Growth Vision of regional policies and strategies. Accordingly, technical refinements were made to the Forecasted Development Pattern in Connect SoCal that included adjustments to growth due to entitlements and maximum planned capacities (in line with the Demographics and Growth Forecast Technical Report). "Locally envisioned growth" was used in some instances to further Connect SoCal's Growth Vision of reducing the need for residents to drive by locating housing, jobs and transit closer together - helping to assure that Connect SoCal's land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities. To ensure transparency during the process to finalize the Forecasted Development Pattern for Connect SoCal, SCAG emailed a letter to each jurisdiction starting February 21 that included a detailed methodology document for SCAG's Growth Vision. Jurisdictions were also given access to their jurisdictional and neighborhood level Forecasted Development Pattern data via SCAG's Scenario Planning Model - Data Management Site. Throughout this effort, SCAG engaged with stakeholders from the Technical Working Group, and also provided an update on the peer review exercise to the Community, Economic, and Human Development Policy Committee.

ID	Comment	Response
<i>Submitted by</i>	City of Irvine	Submittal 0001529 Related Documents Link
0001529.08	We further note the failure to rely on accurate jurisdictional-level data divorces the 2020 RTP/SCS from the methodology proposed in the RHNA as required by Government Code Section 65080 (b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final 2020 RTP/SCS.	See Master Response #1.
0001529.09	The alignment of SCAG's Regional Housing Needs Assessment (RHNA) and RTP/SCS documents is required by Government Code Section 65080 (b)(2)(B) and Section 65584.04(m). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." The City of Irvine has expressed concern throughout the RHNA methodology development process with the utilization of the Interstate 5 Bus Rapid Transit (BRT) corridor. The HCD approved RHNA methodology identifies three station stops within the City of Irvine, however, the Interstate 5 BRT project and the three station stops have not been approved or vetted by the City and are not certain. The City of Irvine requests that the station stops within the City of Irvine or potential references to them be removed from the RTP/SCS.	Please see Master Response #1. In addition, SCAG coordinates with the county transportation commissions and transit operators in the region to identify financially constrained long-range transit improvements. The transit projects included in Connect SoCal for Orange County reflect the input from the Orange County Transportation Authority (OCTA) developed through its Transit Master Plan, identifying an Orange County Transit Vision for enhancing and expanding public transit, and its Long Range Transportation Plan. Connect SoCal includes a future High Quality Transit Corridor on I-5 serving South Orange County, consistent with OCTA's 2018 Long Range-Transportation Plan.
0001529.10	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 and responsive to changing technological advances.	Thank you for your comment. SCAG does not recommend specific companies be granted favor over others, but it is in the purview of SCAG to provide guidance regarding sustainability, safety, equity and other regional concerns that might arise from a category of technologies. For example, if a technology is proven to increase greenhouse gas or criteria pollutant emissions, it is our responsibility to advise our member agencies that such a technology is not in line with our state-mandated goal to reduce emissions.
0001529.11	Language throughout the draft 2020 RTP/SCS, the PEIR, and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues, such as active transportation, public health, and land use policy. While these issues are important, using opinion-based and emotionally-charged language is inappropriate in this context. SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Enclosure 1.	Comment noted. Proposed revisions will be considered in the Final Connect SoCal. With regards to the PEIR, the PEIR is a factual unbiased document. No language is intended to be biased or overly dramatic. Please see Section 10.0 Corrections and Additions of the Final PEIR.

ID	Comment	Response
<i>Submitted by</i>	City of Irvine	Submittal 0001529 Related Documents Link
0001529.12	<p>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 measure rests 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. The City of Irvine 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)(ii) and CEQA Guidelines, including section '15091(a)(2). Nevertheless, given the express limitation of Senate Bill 375 (SB 375) upon respective local agencies' land use authority, the City of Irvine 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. The City of Irvine recommends SCAG change all language in all project level mitigation measures to read "should consider where applicable and feasible." This change will clarify that the project level mitigation measures are a menu of options.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001529.13	<p>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. 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 mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is "Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations." Similar language is included in some mitigation measures.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001529.14	<p>Throughout the 2020 RTP/SCS, PEIR, and associated appendices, there are references to "cities". Since the SCAG region also includes counties, it is recommended that references to "city" or "cities" are changed to "jurisdiction" or "jurisdictions" where appropriate.</p>	<p>Comment noted. Proposed revisions will be considered in the Final Connect SoCal. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001529.15	<p>There are many different abbreviations used throughout the documents. To avoid confusion and help persons unfamiliar with technical jargon, spelling out the acronyms prior to using them for the first time is common; however, this is often missing in the 2020 RTP/SCS documents.</p>	<p>Comment noted. Proposed suggestions will be considered in the Final Connect SoCal.</p>

ID	Comment	Response
<p><i>Submitted by</i> City of Irvine Submittal 0001529 Related Documents Link</p>		
0001529.16	<p>When a report of such complexity as the 2020 RTP/SCS 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 reaching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without source information embedded in the graphic, information can be spread without proper attribution. The City of Irvine understands 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.</p>	<p>Comment noted. Proposed revisions will be considered in the Final Connect SoCal.</p>
0001529.17	<p>Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, therefore, it should not be assumed that they will be approved. The City of Irvine recommends that SCAG reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. SCAG should also clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001529.18	<p>The City of Irvine appreciates your consideration of all comments provided in this letter and enclosure and looks forward to your responses. It is a shared goal to have a Regional Transportation Plan and Sustainable Communities Strategy adopted by the April 2020 deadline that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels.</p>	<p>Comment noted.</p>
<p><i>Submitted by</i> City of La Habra Submittal 0001356 Related Documents Link</p>		
0001356.01	<p>Thank you for the opportunity to review the "Draft Connect So Cal Program Environmental Impact Report". As you are aware, the California Environmental Quality Act allows potentially affected agencies to comment on proposed projects that may cause significant environmental impacts to their community. Given the nature of the project," the following are our concerns and comments: DOWNLOADS Draft Connect SoCal Plan- No comments.</p> <p>Chapter 0: Making Connections- No comments. Chapter 1 : About the Plan- No comments.</p> <p>Chapter 2: SoCal Today- No comments. Chapter 3: A Path to Greater Access, Mobility and Sustainability- No comments. Chapter 4: Paying our Way Forward- No comments.</p> <p>Chapter 5: Measuring our Progress- No comments. Chapter6: Looking Ahead - No comments. Glossary: No comments. TECHNICAL REPORTS Active Transportation- Page 19. Discuss why Figure 7 and Figure 9 are different but with the same title.</p>	<p>Comment noted. This error has been corrected, Figures 7 and 9 are now correctly labeled.</p>
0001356.02	<p>Page 42. Figure 27-The graph is difficult to interpret. TheY-Axis is speed and the X-Axis appears to be percentages. It has been proven that higher speeds cause more injuries and deaths but this particular graph does not make sense.The Y-Axis appears to be a percentage ... a percentage of what?</p>	<p>Comment noted. Figure 27 has been edited for easier interpretation.</p>

ID	Comment	Response
Submitted by City of La Habra		
		Submittal 0001356 Related Documents Link
0001356.03	Page 51. Figure 30- Some of the colors appear to be the same. Please use different colors so that the data can be understood.	Graphic will be adjusted for better legibility.
0001356.04	Page 99. Don't "fade" the north Orange County area. Show the entire County including the La Habra and Brea area. The header can be relocated to another location on the page.	Comment noted. Graphics have been adjusted to ensure full visibility of the entire county.
0001356.05	Appendix 1, Page 2. Define SOV (Single Occupancy Vehicle)	The SOV acronym will be spelled out in the Final Connect SoCal.
0001356.06	Page 4. There needs to be discussion bringing Los Angeles Metropolitan Transit Authority (METRO) facilities into Orange County. METRO and Orange County Transportation Authority (OCTA) need to start discussing this soon if they have not already.	Comment noted.
0001356.07	Page 116, Exhibit 25- Title obstructs Collision Density data. Please relocate the Title.	The title has been relocated to allow visibility to the collision density data.
0001356.08	Page 128- The Burlington Northern Santa Fe Railroad has already adopted design standards to accommodate future electrification of their rail system by requiring addition clearance for new overhead bridges over their tracks	Comment noted.
0001356.09	Page 21, The 1-405 Project between State Route 73 and 1-605 is already underway. The completion year stated in the document is 2026. Is this completion date correct?	Comment noted. Project ORA030605 was submitted by Orange County Transportation Authority in the 2019 FTIP and in Connect SoCal with a completion year of 2026 as shown.
0001356.10	Page 32, Exhibit 7- The High-Quality Transit Corridors don't appear to match maps in previous Exhibits (Passenger Rail). One shows a High-Quality Transit Corridor along Harbor Boulevard and the other one does not.	High Quality Transit Corridors (HQTCs) shown in Exhibit 7 are defined in the Appendix to the Transit Technical Report and are based on bus service frequencies in the peak period. Other exhibits do not depict bus service frequencies, nor do they depict HQTCs, and should not be compared to Exhibit 7 in that regard.
0001356.11	Page 56, Mitigation is spelled wrong in the Title on the right side of the page. Please check the second sentence under this same Title. I think the sentence should read "Very large earthquakes (M>7.5) on the San Andreas Fault are both the most uncommon and potentially the most devastating to the region and the nation." These types of large earthquakes are not the most common type of earthquakes in Southern California.	Comment noted. The Transportation Safety & Security Technical Report has been updated.
Submitted by City of Laguna Hills		
		Submittal 0001547 Related Documents Link
0001547.01	The City of Laguna Hills appreciates SCAG's efforts to address complex regional issues and to collaboratively plan with local jurisdictions. The City of Laguna Hills respectfully provides the comments below concerning SCAG's 2020 RTP/SCS known as Connect SoCal (the Plan).	Thank you for your comments. SCAG will take your comments into consideration.
0001547.02	Local InputThe City supports the use of data provided to SCAG on behalf of the City by Cal State Fullerton's Center for Demographic Research (CDR) via OCP-2018. At this time the City understands that CDR has not yet been given the opportunity to review the final RTP/SCS growth forecast. The City does not support any intensification of the City's land uses in the proposed RTP/SCS beyond the local input provided in OCP-2018.	Comment noted.

ID	Comment	Response
<p><i>Submitted by</i> City of Laguna Hills Submittal 0001547 Related Documents Link</p>		
0001547.03	<p>Interstate 5 (I-5) High Quality Transit Area (HQTA) Proposal-South Orange County The City is perplexed by the Plan's proposal to designate I-5 in south Orange County as a High Quality Transit Area. The Plan refers to HQTAs as corridor-focused growth areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. No such transit access currently exists anywhere in south Orange County, and based on the City's understanding of the Orange County Transportation Authority's (OCTA) operations, no such transit access is contemplated. Without the appropriate supporting transit, an HQTA designation for I-5 is not justified.</p>	<p>Thank you for your comment. The I-5 BRT project was identified to SCAG by the Orange Country Transportation Authority as a future high quality transit corridor consistent with the applicable statutory definitions provided under the California Public Resources Code. The Final Connect SoCal will reflect HQTA maps that do not include HQTAs along freeway segments that do not have transit stops and are not accessible to transit riders. The definition of HQTAs will be updated in the Final Connect SoCal to clarify that freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTA.</p>
0001547.04	<p>Nearly 360,000 motorists travel the I-5 daily in South Orange County, and volumes are expected to grow 25 percent by 2045 (OCTA, 2019). Increasing higher intensity housing uses along the I-5 will merely add congestion without reducing per capita VMT since limited transit alternatives for commuting to job centers exist for South County residents.</p>	<p>Comment noted. Connect SoCal includes a future High Quality Transit Corridor on I-5 serving South Orange County, consistent with OCTA's 2018 Long Range-Transportation Plan.</p>
0001547.05	<p>While OCTA and CalTrans are working to implement various widening projects to improve capacity of the I-5, there are no plans associated with CalTrans or OCTA projects to add any infrastructure typically associated with an HQTA. In addition, a substantial portion of the land area adjacent to I-5 in south Orange County is constrained by steep slopes, flood control improvements, rail infrastructure, water and sewer infrastructure, and open space. There may be pockets of areas that exist along the I-5 that could arguably transition to higher intensity land uses under the Plan (such as near existing Transit Priority Areas), but these pocket growth areas do not justify the designation of the entire I-5 corridor as an HQTA. Therefore, the City requests that the HQTA designation be revised on the I-5 corridor to extend no further south than El Taro Road. The City believes revising the HQTA in this manner is appropriate given a variety of land use and planning factors that exist in the area. These factors lend themselves to supporting a transition to higher intensity land uses contemplated by the Plan in the City of Laguna Hills.</p>	<p>Thank you for your comment. The I-5 BRT project was identified to SCAG by the Orange Country Transportation Authority as a future high quality transit corridor consistent with the applicable statutory definitions provided under the California Public Resources Code. The Final Connect SoCal will reflect HQTA maps that do not include HQTAs along freeway segments that do not have transit stops and are not accessible to transit riders. The definition of HQTAs will be updated in the Final Connect SoCal to clarify that freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTA.</p>
<p><i>Submitted by</i> City of Lancaster Submittal 0001375 Related Documents</p>		
0001375.01	<p>To Whom It May Concern.After reviewing the projects listed in the Connect SoCal PEIR document, the City of Lancaster would like to submit to you that there are two of our projects missing from the project listing. The following are the TIP IDs and Titles for the missing projects:-LA9918789: 10th Street West and Avenue J Improvements-LATP16S001: 10th Street West Road Diet & Bikeway ImprovementsPlease let me know if you have any questions.</p>	<p>FTIP projects listed in Project List Technical Report incorporate projects from the adopted 2019 FTIP and Amendments #19-01, #19-02 and #19-12. LA9918789 was programmed in a subsequent amendment - #19-15. To view any changes to projects in subsequent amendments, please refer to the SCAG FTIP program website. LATP16S001 is included under a grouped project listing under LA11G3. Therefore, a specific listing is not identified in the Project List.</p>
<p><i>Submitted by</i> City of Los Angeles Submittal 0001324 Related Documents</p>		
0001324.01	<p>I commend SCAG's leadership in regional planning for environmental, sustainable & integrated transportation system. I would encourage greater emphasis on researching and recommending high impact (on equitable and sustainability outcomes). Pilot programs & interventions based on your travel demand & growth modeling.</p>	<p>Thank you for your comments. Comments noted.</p>

ID	Comment	Response
<i>Submitted by</i>	City of Los Angeles, Department of Transportation	Submittal 0001304 Related Documents
0001304.01	<p>LADOT is currently reviewing the draft Connect SoCal Plan. We noticed that in the Project List Technical Report, there is no lead agency listed in Table 1. Also the lead agency in Table 3 does not specify if the project's lead agency is Los Angeles City or Los Angeles County. Would it be possible to receive the FTIP Project List and the Unconstrained Project List (Table 3) with only the projects the City of Los Angeles is the lead agency for? This would help our review immensely.</p>	Comment noted. Tables 1 and 3 for City of Los Angeles projects have been provided.
<i>Submitted by</i>	City of Los Angeles, Department of Transportation	Submittal 0001555 Related Documents Link
0001555.01	<p>Policy and Planning Framework Since the adoption of the 2016 RTP/SCS, the City of Los Angeles adopted several plans and policies that further the legislative framework that informs the Connect SoCal. We are pleased to see SCAG acknowledge the City's Mobility Plan 2035 as a substantial advancement since the adoption of the 2016-2040 RTP/SCS. The Mobility Plan 2035 fundamentally shifted the City's priorities by adopting goals that include designing for safety first, building a world class infrastructure with a 'complete streets' planning framework, access for all Angelenos, more collaboration and informed choices, and a clean environment and health community. These goals align with the goals of SB 375 to reduce greenhouse gas emissions that are a bi-product of travel, especially drive-alone trips. Since the adoption of the Mobility Plan 2035, the City continues to put the plan into action with meaningful results. In advancing the safety first goal, LADOT released the Vision Zero Action Plan which aims to eliminate traffic-related deaths by 2025. LADOT's Strategic Plan Great Streets for Los Angeles released in January 2018 describes the department's vision to provide access to safe and affordable transportation choices that treat everyone with dignity and support vibrant inclusive communities. This Strategic Plan includes actionable strategies that advance the department's priorities through 2020.</p> <p>Transportation technologies have changed rapidly within the past five years. LADOT released a transportation technology strategy titled, Urban Mobility in a Digital Age in August 2016, which focuses on building a solid data foundation, leveraging technology and design for a better customer experience, creating partnerships for more complementary shared services and prepare for an automated future. In November 2019, LADOT released the Technology Action Plan that outlines the visions defined in the Urban Mobility in a Digital Age. This action plan provides guidance for LADOT to clearly communicate physical and virtual platforms that maximize equity and livability.</p>	Thank you for your comment. SCAG applauds your commitment to improve mobility and safety along with goals to reduce greenhouse gas emissions, especially from drive alone trips.
0001555.02	<p>Lastly, Mayor Eric Garcetti released LA's Green New Deal in April 2019, which sets aggressive goals for the City's sustainable future, tackles the climate emergency with accelerated targets to reduce greenhouse gas emissions, strengthens our economy and middle class, and sets the City on course to be carbon neutral by 2050. We would like to underscore the strong commitments the City has made to advance innovative and sustainable transportation strategies that have the potential to transform the historical reliance on the personal automobile. In the creation of the Final Connect SoCal Plan, we invite SCAG to draw from the vast array of transformative strategies that can increase the share of sustainable trips, especially those that scale at the regional level.</p>	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	City of Los Angeles, Department of Transportation	Submittal 0001555 Related Documents Link
0001555.03.1	<p>Transportation System Project List The RTP includes an extensive project list. As stated in the Project List appendix, the list is divided into three primary sections, as follows: 1) The Federal Transportation Improvement Program (FTIP), which forms the foundation of the RTP project investment strategy and represents the first six years of already committed funding; 2) the Financially Constrained list of projects not included in the FTIP but which have "reasonably available" funding; and 3) Strategic Plan projects representing an unconstrained list of potential projects that the region would pursue given additional funding and commitment. LADOT closely reviewed the three Transportation Project lists. The City's requested revisions are categorized under the three RTP project list categories:</p>	Comment noted.
0001555.03.2	<p>FTIP: A small number of projects that were removed in a recent FlIP amendment remain on this draft list. This list should be updated to reflect the most recent FTIP amendment;</p>	<p>Comment noted. The FTIP projects included within the Draft Connect SoCal Project List Technical Report incorporate the adopted 2019 FTIP and Amendments #19-01, 19-02, and #19-12. To view any changes to projects in subsequent amendments, please refer to the SCAG FTIP program website.</p>
0001555.03.4	<p>Financially-Constrained RTP: SCAG should work with the City to ensure all eligible projects and programs are captured in the final list. There are some projects that have identified-funding, under construction or being implemented that are omitted that should be included;</p>	<p>Comment noted. Most of the projects featured in the Plan's Project List Technical Report were provided by the six County Transportation Commissions (CTCs), in this case Metro. Decisions to delete, replace or modify a project must come through the CTC. Please work with Metro to include projects into the current FTIP and RTP during the next amendment opportunity.</p>
0001555.03.6	<p>Strategic Projects: Some projects on this list were identified from adopted Community Plans and include projects related to decreasing automobile delay and improving the outdated Level of Service (LOS) metric. The City is re-evaluating whether these projects are compatible with the policy goals of SB 743. Several Community Plans are anticipated to be updated over the next few years and City staff may work with SCAG to ensure this projects on this list are compatible withcurrent City policy goals.</p>	<p>Comment noted. SCAG Staff would be happy to work with the City of Los Angeles and LA Metro staff in the future to reflect these locally approved Community Plans in future updates.</p>
0001555.04	<p>Following the review of the Transportation Conformity Analysis Technical Report, Table 63 should reflect any changes made to the FTIP Project List included in the Project List Technical Report. LADOT recently initiated the Mobility Investment Program (MIP), which represents the department's data-driven effort to capture and plan for mobility investments that advance the City's values and vision for transportation. The MIP institutes project-delivery best practices toidentify funding opportunities early in project development, enhance project engagement and evaluation protocols, pursue formalized interagency collaboration, and establish short- andlong-term capital improvement plans. As a comprehensive, map-based inventory of both funded and unfunded projects, LADOT will utilize the MIP to develop short-term (five year) and long-term (20 year) plans to serve as the Department's infrastructure playbook that willprioritize the City's mobility investments. In coordination with the RTP project lists, the MIP will be cross-referenced to ensure the projects within the City are included on the appropriate RTPproject lists and reflect a similar level of priority and implementation timeframe identified by the City.We suggest that the SCAG staff responsible for compiling the Transportation System Project List meet with LADOT Planning and Policy staff prior to adoption of the Final Connect So Cal Plan to ensure project information is up to date. Should the RTP Project Lists be updated to address any of the comments mentioned above, LADOT requests SCAG closely coordinate with City staff on the revisions.</p>	<p>Comment noted. Changes made to the Transportation Conformity Analysis Table 63 will be coordinated with the latest approved FTIP and amendments prior to finalizing Connect SoCal. The Draft Connect SoCal reflected changes completed up to the 2019 FTIP including amendments #19-01, #19-02 and #19-12. Subsequent amendments could not be reflected in the draft version Connect SoCal due to the preparation timeline. To view any changes to projects in subsequent amendments, please refer to the SCAG FTIP program website. Please work with Metro to coordinate project consistency between the City's MIP and Connect SoCal.</p>

ID	Comment	Response
<i>Submitted by</i>	City of Los Angeles, Department of Transportation	Submittal 0001555 Related Documents Link
0001555.05	<p>SB 743 Implementation In 2013, the State of California signed SB 743 into law, which requires a shift in the way cities measure environmental impacts. State guidelines require all cities to update their transportation impact analysis metrics from level of service (LOS) to vehicle miles traveled (VMT) before July 1, 2020. In July 2019, the City of Los Angeles adopted new CEQA Transportation thresholds, accompanied by updated Transportation Assessment Guidelines, to comply with SB 743. The City acknowledges SCAG's efforts noted in the Connect SoCal plan to support and assist in the implementation of SB 743 throughout the region. One notable effort was the assistance provided through the Sustainability Planning Grants, of which several jurisdictions took advantage of including the City of Los Angeles. LADOT encourages SCAG to continue taking a leadership role in providing technical assistance to cities beyond the State's deadline to comply. SCAG's in-house data and transportation modeling expertise could be leveraged to provide hands-on assistance to the jurisdictions within the SCAG region that may not have the staff resources or funding to appropriately respond to the State mandate. SCAG's leadership could narrow the gap in staff capacity and available funding by developing sub-regional sketch planning tools and recommending uniform thresholds to be considered for each sub-area Council of Governments (COG). SCAG should continue to help develop VMT exchanges by providing more technical capacity and regional forums with a goal to better serve areas of the region with fewer mitigation options. Continued research on these topics will allow for more efficient implementation of SB 743 across jurisdictional lines in order to achieve the intended outcomes of the legislation: promote reductions in greenhouse gas emissions, develop multimodal transportation networks, and diversify land uses.</p>	<p>Thank you for taking the time to review and comment on the draft Connect SoCal. The cooperative and constructive relationship enjoyed between SCAG and LADOT is highly valued and appreciated and we look forward to our continued collaboration as we work together toward achieving the successful implementation of SB 743 in Los Angeles and in all of the communities throughout the region. SCAG recognizes the importance of sharing data and providing other available technical resources with our local jurisdictions as part of SB 743 implementation.</p>

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<i>Submitted by</i>	City of Los Angeles, Department of Transportation	Submittal 0001555 Related Documents Link
0001555.06	<p>Emerging Transportation Technology Transportation technology has evolved rapidly over the last five years. Micro-mobility and on-demand transportation services, including Transportation Network Companies (TNCs) and dockless devices have dramatically changed how people travel within the City of Los Angeles and the SCAG region. The draft Connect SoCal plan's Emerging Technology Technical Report initiates a discussion on how these technologies impact travel behavior regionwide. Connect SoCal alludes to the possibility of emerging technologies disrupting the transportation system and increasing VMT. We encourage SCAG to take a more proactive approach to integrating new transportation technologies in a way that promotes sustainable travel choices and meets the region's greenhouse gas emission reduction goals. LADOT's strategy for regulating, monitoring, and evaluating emerging transportation technologies is outlined in Urban Mobility in a Digital Age. The groundwork by which LA DOT will implement this plan and regulate emerging technologies can be found in LADOT's Technology Action Plan (TAP).⁵ LADOT recommends SCAG provide guidance in Connect SoCal to help cities throughout the region effectively manage new innovations operating in public spaces and neighborhoods. Cities host a suite of operational and regulatory services that include moving people to safety during emergencies, sometimes shutting down streets, providing safe passage to those wishing to gather and demonstrate, and managing and pricing the curb to regulate parking and deliveries. New technology enabled modes require technological tools to enforce regulations, streamline customer service, and empower private companies to provide service equitably and responsibly. SCAG should consider both the needs and the opportunities of government agencies within their jurisdiction to leverage the technological advancement that brings both challenges and opportunities. In September 2019, LADOT deployed the Mobility Data Specification (MDS) to regulate dockless mobility. We urge SCAG to consider advancing the role of MDS and other digital regulatory tools to better plan for evolution in the transportation technology landscape.</p>	<p>Thank you for your comment. Through the Future Communities Framework approved by the Regional Council in 2017, SCAG has been actively working to accelerate the adoption of innovative policies and programs across the region. Through improvements in data collection, analysis and technology applications, governments have the opportunity to be more efficient, innovative and transparent. Some of the policies included in the Framework include promoting data-driven decision-making, government transparency, and data as a public engagement tool to accelerate progress toward achieving regional planning goals; increasing availability of civic data and information to reduce costs and increase the efficiency of public services; facilitating regional collaboration to ensure regional and local public data governance structures are in place to protect our data systems and people; championing fairness and social equity in the deployment of new technologies within the region. The Future Communities Pilot Program (FCPP) further leverages grant funding to support deployment of new and smart technologies to reduce transportation demand and improve government service provision. The City of Los Angeles Department of Transportation is one of eight grantees under the inaugural round of FCPP.</p>
0001555.07	<p>Lastly, public transit use has declined over the past few years both throughout the SCAG region and nationwide. As the regional Metropolitan Planning Organization, SCAG plays a unique leadership role in policies and programs that support public transit use and sustainable transportation modes.</p>	<p>Comment noted.</p>
0001555.08	<p>Transportation Model Review As SCAG updates and makes changes to the transportation model, LADOT urges SCAG to work closely with City staff to ensure those changes are consistent with existing datasets and forecasts. LADOT uses SCAG's transportation model as the foundation for the City's transportation model. Transparency in the development of the model, baseline model assumptions, and framework are valued and critical components of the update process.</p>	<p>SCAG will work closely with City staff regarding the model validation procedure as well as model input data consistency.</p>
0001555.09	<p>Conclusion The draft Connect SoCal Plan and Program EIR provide a long-range vision that aims to balance future, regional mobility and housing needs with economic, environmental, and public health goals. The plan represents a six-county effort to meet both State and Federal requirements and GHG reduction targets. If approved, the comments in this report will be submitted to SCAG by LADOT on behalf of the City of Los Angeles.</p>	<p>Thank you for your comments. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	City of Mission Viejo	Submittal 0001546 Related Documents Link
0001546.01	The City of Mission Viejo respectfully submits comments on the Southern California Association of Government (SCAG) draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and its associated Draft Program Environmental Impact Report (EIR), also known as Connect SoCal and the Connect SoCal Program EIR.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.02	The comments provided below identify broader policy inquiries that surfaced as we reviewed the Connect SoCal documents. SCAG's responses to these inquiries will further assist in our understanding of the achievement of SB 375 greenhouse gas emissions reductions on the Connect SoCal Plan and its EIR alternatives, in addition to a clearer understanding of the application of Connect SoCal policies and EIR mitigation measures on local government projects.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.03	Greenhouse Gas Emissions Reductions:1) Connect SoCal Program EIR: Section 4; Alternatives: Discussion: One of the primary objectives of Connect SoCal is to achieve SB 375 greenhouse gas emissions reduction targets for Year 2020 and Year 2035. The Connect So Cal Plan and the Program EIR identify that the Proposed Plan exactly meet the Year 2020 and Year 2035 GHG emissions reduction targets for cars and light-duty trucks of a per capita 8% and 19% reduction, respectively (PEIR: Table 3.8-10: SB 375 Analysis, page 3.8-74).	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.04	The Draft Program EIR Alternatives section further outlines three alternatives for analysis: the No Project Alternative, Existing Plans-Local Input Alternative, and Intensified Land Use Alternative. As discussed below, the City of Mission Viejo recommends that the Program EIR be revised to include a quantification and consistent discussion on the amount of GHG emissions reduction that would be achieved for each EIR alternative.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.05	This request is of particular importance, since Connect SoCal is based upon a land use distribution that differs from the Local Input received from SCAG jurisdictions. While the total numbers of population, households and employment are consistent at the jurisdiction level with the input provided by local jurisdictions on their future growth estimates, the proposed Connect SoCal plan internally shifts, within jurisdictions, future growth proximate to Priority Growth Areas such as high quality transit areas, resulting in a land use distribution that differs from the Local Input distribution, to reduce Vehicle Miles Traveled (VMT) and reduce greenhouse gas emissions.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.06	Recommendations: Given that the distribution of land uses is different between the proposed Connect SoCal Plan, the Local Input Alternative, and the Intensified Land Use Alternative, the PEIR should clearly identify and consistently discuss in the narrative of each EIR Alternative, how much per capita GHG emissions reduction would be achieved for both Year 2020 and Year 2035, for all the EIR Alternatives, as follows:a) Table 4.0-1: Comparison of Connect SoCal and Alternatives (pages 4.0-7 -4.0-9) should be revised to include an "element" that addresses the amount of SB 375 GHG emissions reduction that would be achieved for Year 2020 and Year 2035 for the Connect So Cal Plan and each of the EIR Alternatives.b) The narrative in the Alternatives section should be revised to consistently identify and reference how much GHG emissions reduction is achieved, for both Year 2020 and Year 2035, for each of the discussed Alternatives.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	City of Mission Viejo	Submittal 0001546 Related Documents Link
0001546.07	Connect SoCal Program EIR: Section 4; Alternatives: Alternative 3: Intensified Land Use Alternative:Discussion: The Draft EIR discussion for the Intensified Land Alternative (pages 4.0-40 and 4.0-41) states that the transportation-related GHG emissions generated by this Alternative is projected to be less than the Connect SoCal Plan, because it generates less VMT. The Draft EIR further states that the Intensified Land Use Alternative is projected to achieve the 2020 target of 8% per capita reduction, and would exceed the 19% reduction for Year 2035 (actual amount is not specified; see Comment #1 above).	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.08	The draft EIR then proceeds to conclude that "Since meeting the regional reduction goals from cars and light-duty trucks would not be sufficient to meet the state's overall GHG reduction goals, this alternative would conflict with AB 32 and SB 32. The Plan would have the same impact as this alternative."	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.09	Recommendation: Please re-review the paragraph cited above. Its conclusion (that the Intensified Land Use Alternative and the Connect SoCal Plan GHG emissions reduction capabilities are not sufficient to meet the targets) seems contradictory and perhaps incorrect, based on the data cited.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.10	Vehicle Miles Traveled:3) Connect SoCal Program EIR: Section 3:8 Greenhouse Gases: SB 743 and VMT GuidanceDiscussion: The Draft Program EIR includes detailed discussion on the statewide and regional emphasis to reduce VMT as a mechanism to tackle greenhouse gas emissions reductions goals established under AB 32, SB 32 and the California Air Resources Board's Scoping Plan. However, the Draft EIR further states that "even if all MPOs meet their regional SB 375 GHG targets, the state would not be able to meet the statewide GHG reduction goals of AB 32, SB 32 and the Scoping Plan." (page 3.8-80).	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.11	Recommendation: Please clarify if there is any discussion in the draft Connect SoCal Plan, the Draft SoCal EIR or any of the technical appendices of said documents, that either identifies, recommends, or infers the attainment of a specific VMT reduction policy, target or performance measure for the SCAG region, or that may be imposed upon local governments.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001546.12	Draft EIR Mitigation Measures:4) Draft Connect SoCal EIR Mitigation Measures: Table ES-5: Summary of Project Impacts, Mitigation Measures and Residual Impacts Discussion: The Draft Program EIR discusses two tiers of mitigation measures: mitigation measures that would be applied to SCAG, and mitigation measures that would be applied to local jurisdictions and other lead agencies responsible for project-specific environmental review documents for specific projects. The project level mitigation measures are currently structured with a reference of "can and should", as follows:"In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(I)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects " (emphasis added).	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<p><i>Submitted by</i> City of Mission Viejo Submittal 0001546 Related Documents Link</p>		
0001546.13	<p>Recommendation: The Draft EIR (page ES-16) states that the project level mitigation measure approach of "can and should" provides detail on possible mitigation measures that can be considered by Lead Agencies as they conduct environmental assessments of specific projects. The Draft EIR further recognizes that flexibility should be maintained in the application of mitigation approaches, given the variety and scope of projects proposed in the 6-county SCAG region. The Draft EIR further identifies narrative that the application of the "can and should" approach, "be considered by lead agencies in project-specific environmental review documents as appropriate and feasible (emphasis added).</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001546.14	<p>The City of Mission Viejo fully supports flexibility in the application of the project-level mitigation measures, and recommends that the each of the project-level mitigation measures listed in the Draft Connect SoCal Program EIR be revised to also include the reference "as appropriate and feasible," as follows: "In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(I)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should, as appropriate and feasible, consider mitigation measures to reduce substantial adverse effects".</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001546.15	<p>The City of Mission Viejo appreciates the opportunity to provide comment on the broader policy issues raised herein, and also expresses support of the comments and recommendations on the Draft 2020 RTP/SCS and PEIR by the Orange County Council of Governments, the Orange County Transportation Authority, the Center for Demographic Research, and other Orange County agencies whose comments support Connect SoCal with its use of the Orange County's growth forecast- the 2018 Orange County Projections.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10, Corrections and Additions, of the Final Connect SoCal PEIR.</p>
<p><i>Submitted by</i> City of Moreno Valley Submittal 0001542 Related Documents Link</p>		
0001542.01	<p>The City of Moreno Valley appreciates the opportunity to submit comments on Southern California Association of Governments' (SCAG) Draft Connect SoCal Plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS).</p>	<p>Thank you for your comments. Comments noted.</p>
0001542.02	<p>It is important that the Connect SoCal Plan is equitable, achievable, and results in sustainable development. The City of Moreno Valley has reviewed the draft Connect SoCal Plan and related technical studies. Based on our review, the City of Moreno Valley has the following comments:</p>	<p>Comment noted.</p>
0001542.03	<p>1.I-215 from I-10 to I-15 should be included as an existing major Goods Movement corridor.</p>	<p>I-215 from I-10 to I-15 is, and has been added as, a major goods movement corridor.</p>
0001542.04	<p>2.SR60 through the Badlands to I-10 should be included as part of the Primary Highway Freight System.</p>	<p>SCAG will include this portion of SR-60 as a goods movement corridor.</p>
0001542.05	<p>3.Plan does not reflect current Riverside County Transportation Commission (RCTC) study / strategy for Metrolink and Express Bus expansion.</p>	<p>Thank you for your comment. SCAG worked with the Riverside County Transportation Commission to identify transit improvements in Riverside County, within available funding constraints. Specific Metrolink and Express Bus expansion projects are listed in the Project List Technical Report.</p>
0001542.06	<p>4.Arterial Network included is not complete for City of Moreno Valley.</p>	<p>The regionally significant arterial system illustrated utilized the principal arterial facility type consistent with the Federal Highway Administration's Functional Classification System.</p>

ID	Comment	Response
<p><i>Submitted by</i> City of Moreno Valley Submittal 0001542 Related Documents Link</p>		
0001542.07	5.The Planned Regional Express Lane Network should be updated to reflect recent Riverside County Transportation Commission (RCTC) decisions.	SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.
0001542.08	6.Active Transportation discussion should include the importance of consistent standards and maintenance for regional trail systems.	Thank you for your comment. Language specific to infrastructure maintenance has been added to the Strategies section of the Active Transportation Technical Report.
0001542.09	7.Bicycle Network is not complete for the City of Moreno Valley.	Thank you for your comment. Through the Local Input and Envisioning Process SCAG attempted to collect updated network data for all member jurisdictions. We would be happy to update our database with the complete network when that information is shared.
0001542.10	8.There is a need to compare the Draft Connect SoCal Plan with the proposed 6th Cycle RHNA for compatibility.	See Master Response #1.
<p><i>Submitted by</i> City of Ontario Submittal 0001548 Related Documents Link</p>		
0001548.01	The City of Ontario appreciates the opportunity to comment on the Draft Connect SoCal Plan and technical support documents. We acknowledge the extensive work that was put forth and look forward to the Plan supporting a sustainable future for the region and the City of Ontario. The City has the following comments:The City of Ontario has actively engaged in the local input process including commenting on the Map Book. The September 21 , 2018 comments provided to SCAG are not reflected in the published Draft Map Book on the SoCal Connect website (see attachment). These include revisions to:• Major Transit Stops and High Quality Transit Corridors• Federally Designated Flood Hazard Zones• Bike Trails• General Plan Land Use MapsWe look forward to working with SCAG and SBCTA to further the Connect SoCal Plan. Thank you for your consideration. We look forward to hearing from you.	Thank you for your feedback on the base datasets for Connect SoCal. SCAG has updated the geographic data elements resulting from the Bottom-Up Local Input and Envisioning Process, and posted the data elements to the SCAG Open Data Portal. For input related to transit projects, SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.
0001548.02	Please see the following comments or corrections to Maps:1. Truck Routes (corrections attached)• Holt Blvd from Grove to west City limits is not identified as a route• 4th street, Etiwanda, and Merrill are Truck Routes	Revision made.
0001548.03	2. Major Transit Stops and High Quality Transit Corridors (correction attached)• Add the Ontario Mills Stop	Thank you for your comment. The Ontario Mills stop does not meet the definition for major transit stop (and therefore transit priority area) provided under the California Public Resources Code. The methodology is described in detail in the Connect SoCal Transit Technical Report Appendix.
0001548.04	3. Major Transit Stops and Transit Priority Areas (correction attached)• Add the Ontario Mills Stop	Thank you for your comment. The Ontario Mills stop does not meet the definition for major transit stop (and therefore transit priority area) provided under the California Public Resources Code. The methodology is described in detail in the Connect SoCal Transit Technical Report Appendix.

ID	Comment	Response
<p><i>Submitted by</i> City of Ontario Submittal 0001548 Related Documents Link</p>		
0001548.05	4. Federally Designated Flood Hazard Zones (comment attached)• The City Policy Plan (General Plan) identifies the area south of SR-60 to the southerncity limit, east of Haven Avenue is identified as a 500-year Floodplain	Comment noted. Data regarding 500-year Floodplain has been updated according to information provided 9/21/2018.
0001548.06	5. Bike Trails• Attached is the zip file for the Bike Trails. Only the segments noted as "Completed" inthe status field have been built.	Thank you for your comment. The bikeway map will be updated with the provided information.
0001548.07	6. Updated General Plan and Zoning with Specific Plan shapefiles• Please retrieve files at this location under file "planning"	Comment noted. Data regarding City of Ontario General Plan, Zoning, and Specific Plans was received on 9/21/2018. Based on this information, SCAG staff made updates to the General Plan, Zoning, and Specific Plan maps.
<p><i>Submitted by</i> City of Oxnard Submittal 0001370 Related Documents Link</p>		
0001370.01	<p>1 of 10. Newly established High Quality Transit Area/Corridor (HQTA/C) was not designated with City consultation and infrastructure evaluation, and has increased the City’s 2021-2029 RHNA Allocation of housing units by 26% which exceeds the City’s 2030 General Plan.SCAG staff worked with Gold Coast Transit (GCT) to collect information pertaining to bus routes and current and projected headway timing. As a result of this discussion, SCAG created the HQTC that encompasses almost half the City and extends through the city of Ventura. Because of this HQTA/C designation, the City was assigned an additional 2,224 “existing needs units” because of the large HQTC designation. The added units represents approximately 26% of the total City’s total RHNA allocation of 8,484 units.</p> <p>The City supported the identification of a HQTA around the Oxnard Metrolink/Amtrak station in downtown Oxnard. In July of 2019, the City adopted a form-based Downtown Code that supports the construction of approximately 1,800 additional housing units. With SB2 money, a study to evaluate infrastructure capacity and needed funding to support projected development is currently underway. The identified and extensive HQT “Corridor” extends from to Saviers Road to the 101 Freeway; this approximately 6-mile corridor runs through established neighborhoods and will require additional infrastructure master planning and expansion (Exhibit 3.4, “Priority Growth Areas & Growth Constraints”). In reviewing the RTP and in discussions with local transit agencies we became aware of the HQTA/C designation. The City of Oxnard has not been involved in this designation. The City of Oxnard should be consulted when designations impact City land use, infrastructure, and capacity. Ideally, consultation should occur well in advance of the release of the Draft 2045 RTP.</p>	SCAG worked with local transit agencies to identify current and future High-Quality Transit Corridors (HQTCs) and major transit stops based on the definitions set forth under the California Public Resources Code. Further discussion about the methodology for identifying HQTCs and major transit stops are discussed in the Transit Technical Report. SCAG's 6th cycle RHNA methodology allocates housing units to jurisdictions in part based on the presence of high-quality transit anticipated by 2045. Please see Master Response #1 for additional discussion of how the RHNA and the RTP/SCS are related.

ID	Comment	Response
<i>Submitted by</i>	City of Oxnard	Submittal 0001371 Related Documents Link
0001371.01	<p>Comment 2 of 10. Internal Consistency with the 2021-2029 RHNA Allocation Methodology. It is our understanding that in accordance with State Law, the 2021-2029 RHNA and the 2020-2045 RTP are required to have consistent population and growth projections. The proposed Housing and Community Development (HCD) approved RHNA Methodology explicitly defines "Local Input" as local forecasts and planned growth to the year 2029. However, these same "Local Input" projections are being used by the RTP to the year 2045. If the 2021-2029 RHNA "uses" all Local Input planned growth to 2045 by 2029, then how can the 2045 RTP, using the same forecasts to the year 2045, be internally consistent with the 2021-2029 RHNA?</p>	See Master Response # 1.
<i>Submitted by</i>	City of Oxnard	Submittal 0001372 Related Documents Link
0001372.01	<p>Comment 3 of 10. Congestion Management/UPRR Grade Separations. Within this chapter is a reference to "Speed and Service improvements on the Los Angeles – San Diego – San Luis Obispo Rail (LOSSAN) Corridor." The LOSSAN includes the Union Pacific Railroad (UPRR) tracks that traverse through Oxnard at grade level, including passing a disadvantaged Environmental Justice (EJ) community that the UPRR/AMTRAK/METROLINK line impacts daily at two grade-level crossings. UPRR grade crossings continue to be a safety concern for the City not only for vehicle and pedestrian accidents, but also as a longer two mile train could effectively isolate one-third of the city from vital public safety access as the train moves slowly through seven at-grade crossings. The RTP Transportation Project List is proposing grade separation projects at three locations in Oxnard: Oxnard Blvd./Vineyard Ave. (5G0404), Oxnard Blvd./Gonzales Road (5G0403), and Rose Avenue/Fifth Street (5G0405). A separation is in progress at Rice Ave./Fifth Street. Three existing grade-separation intersections are not listed, Del Norte Blvd./Fifth Street, Colonia Road, and Cooper Rd.. One City-proposed crossing, Camino del Sol/Oxnard Blvd., is also not included. Only the Rice Ave./Fifth Street separation is in the Oxnard General Plan.</p> <p>These are not new proposals. Oxnard Public Works evaluated several grade separation options about ten years ago. Because of the high water table, the separations would likely involve elevating the UPRR tracks and passing numerous homes and businesses, or elevating the street and impacting a significant number of businesses, schools, and homes. The noise impacts are obvious from an elevated train. The City would like to continue discussing grade separation options with SCAG or other agencies in an effort to protect public safety and ensure significant engineering, environmental, and environmental justice concerns are adequately addressed. Early consultation and engagement with the City is appreciated.</p>	Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Please work with Ventura Transportation Commission to include the projects during the next amendment to the RTP and/or FTIP.

ID	Comment	Response
<i>Submitted by</i>	City of Oxnard	Submittal 0001373 Related Documents Link
0001373.01	<p>Comment 4 of 10Demographics and Growth ForecastThe Oxnard population, household/units, and employment forecast within Table 14 are consistent with numbers the City provided to SCAG in 2018: 238,100 population, 61,600 households, and 76,100 jobs. The forecasts remain unchanged. As stated above in general comment No. 2, we question how the 2021-2029 RHNA Allocation can use all of our projected 2045 growth by 2029 while the RTP continues to use 2045 as the out-year for the same forecast. Even accepting an argument that adding housing units for existing need does not create growth and, therefore, the population and jobs forecasts remain unchanged, the households and unit forecasts cannot be internally consistent.</p>	Please see Master Response #1.
0001373.02	<p>Comment 5 of 10Environmental Justice (EJ)This chapter recognizes that Oxnard has a sizable disadvantaged population and considerable exposure to a range of environmental hazards that lead to several census tracts being ranked among the top 5% and 10% of CalEnviroScreen impacted statewide census tracts. Exhibit 33 indicates that the Oxnard/Ventura HQT/C area is about half within 500 feet of the 101 Freeway and impacted by noise and vehicle emissions, supporting our general comment No. 1 as to the wisdom of this designation. Table 49, although summary data, certainly includes the Oxnard EJ population likely to be impacted by at least two of the proposed UPRR grade separations within central Oxnard. We suggest that SCAG include a policy recommendation that a jurisdiction with EJ populations be allocated EJ-related planning and project funding on a formula basis rather than competitive basis. The formula grant would include a range of criteria that, although implementing worthwhile goals such as Greenhouse Gas (GHG) reduction and reduced Vehicle Miles Travelled (VMT), take considerable staff time to complete. Oxnard already has a relatively low VMT per capita and short intracity commuting. In several EJ-related competitive grant applications, we could not document VMT and GHG reductions because it is just not possible when both metrics are already low. Yet, we have many worthy EJ-related project needs such as street realignment improvements to allow two-way transit use on arterials rather than residential streets. Please consider a policy that some portion of EJ-related set-asides should be formula based.</p>	Comment noted. A recommended practice or approach regarding project funding based on a formula as opposed to competitiveness will be added in the “Other Policy Recommendations for EJ Impacts” of the EJ Toolbox. The EJ Toolbox is meant to be a dynamic resource document that changes with time so it will have the most relevant information for readers and EJ stakeholders to use.

ID	Comment	Response
<i>Submitted by</i>	City of Oxnard	Submittal 0001373 Related Documents Link
0001373.03	<p>Comment 6 part 1Highways and ArterialsThe City supports the proposed widening of the 101 Freeway to four lanes through Ventura County. Oxnard, partly at our own expense, has already added a fourth through-merge lane between three new 101 intersections (Oxnard Blvd., Vineyard, and Rose Avenue) and the City’s 2030 General Plan supports a fourth lane through the Rice Avenue (State Highway 1) and Del Norte Blvd. intersections. There are two four-lane flyover (an elevated bridge over a roadway or railroad) proposals on City streets that the City has not proposed and are not identified improvements in the 2030 Oxnard General Plan: 1) Gonzales Rd/Victoria Ave. (5A0401), and Rose Ave./Gonzales Road (5A0402). The Rose Ave./Gonzales Road is especially problematic as there are numerous businesses and a hospital on the four corners and a flyover would involve expensive takings. This flyover was removed from the City’s prior General Plan (2020 General Plan), as were several other street widening projects which resulted in the removal of homes or businesses. The Gonzales Rd/Victoria Ave. improvement appears to be in tandem with proposals that widen Victoria Avenue to six lanes from the Ventura city limits to Gonzales Road, within the City of Oxnard (known as projects “5A0722 and 5A0726”). The City will need to be actively involved in these projects. While we have not studied the improvements nor discussed them with our residents, we are concerned regarding the potential impact these improvements may have. Early consultation with the City is necessary. A third major proposed highway widening is the widening of Harbor Blvd. from Oxnard city limits to Ventura city limits (known as project project “5A0720”). This description may be in error as Oxnard city limits extend to the north end of the Harbor Blvd. bridge over the Santa Clara River estuary. Does the project include widening the Harbor Blvd. bridge? That would seem to be a major undertaking given consideration of sea-level rise and sensitive habitats. The City has no position at this time on the proposed widening, we just want to make SCAG aware of significant engineering, environmental, and environmental justice concerns and ask for early consultation.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>
0001373.04.1.1	<p>Comment 6 part 2Project VEN34095, titled “In Oxnard Colonia Rd/Camino Del Sol Oxnard Boulevard (Rt 1) To Entrada Dr Construct 4 Lanes” is unknown to the City and is an incorrect reference to Rt. 1. Oxnard Blvd. has not been Rt. 1 since 2012. Widening of Colonia Rd. is essentially not possible as the community is fully developed to the existing right of way. Please delete this project from the RTP Project List.</p>	<p>Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. If further revisions are needed, please coordinate with your county transportation commission, in this case Ventura County Transportation Commission, to incorporate revisions in a future amendment to the RTP and/or FTIP.</p>
0001373.04.1.2	<p>Finally, the City does support the proposed widening of Hueneme Road to four lanes to Rice Avenue (project “VEN011202”). We urge SCAG to prioritize this project as a much-needed improvement that facilitates diverting Port of Hueneme truck traffic off of City streets and onto Rice Avenue, which is State Highway 1.</p>	<p>Comment noted. VEN011202 featured in the Project List Technical Report was provided by Ventura County Transportation Commission (VCTC). A decision to prioritize the project is the result of a coordinated inter-agency effort and must come through VCTC.</p>
0001373.05	<p>Comment 7 of 10Avoiding Conversion of Natural and Farmland AreasThe City welcomes SCAG’s continued support for the preservation and non-conversion of Ventura County agricultural industry and natural habitat areas. Ventura County voters extended the Save Open Spaces and Agricultural Resources (SOAR) initiatives to the year 2050 that places the conversion of agricultural and open space land to urban uses with the voters, with certain exceptions. About 25% of Oxnard’s economy is based on agricultural and related services.</p>	<p>Comment noted.</p>

ID	Comment	Response
<p><i>Submitted by</i> City of Oxnard Submittal 0001373 Related Documents Link</p>		
0001373.06	<p>Comment 8 of 10 Passenger Rail The City's questions and concerns regarding the rail operations, both commercial and passenger, were stated earlier with regard to grade separations. In general, the City supports increases in Metrolink and Amtrak services and encourages a commuter service to Santa Barbara.</p>	<p>Connect SoCal supports improvements in Metrolink and Amtrak/Los Angeles-San Deigo-San Luis Obispo (LOSSAN) services throughout the SCAG region including Ventura County.</p>
0001373.07	<p>Comment 9 of 10 Transit Numerous projects and policies support the expansion of transit and improvement of the transit experience. The City works closely with GCT in planning local routes and bus stops, and with VCTC for intercity routes. As stated in general comment No. 1, the designation of the HQTAs implies significant expansion of GCT service in the mapped area, possibly at the expense of other areas that are waiting for transit, such as service to beach areas and tourist-oriented transit. We are concerned that SCAG's emphasis on journey-to-work transit as a path to GHG and VMT reduction is preventing and discouraging other valid routes and transit applications. The efficacy of the mapped HQTAs to reduce work trips and VMT is questionable, as the HQTAs omits most of northeast Oxnard where most existing and over 15,000 future jobs are located. The HQTAs does appear to include Naval Base Ventura County at its south end and link through the Ventura County Government Center, which makes sense. Again, we have not evaluated the HQTAs designation in conjunction with GCT and reserve making additional comments.</p>	<p>SCAG worked closely with local cities including the City of Oxnard and transit agencies, including Gold Coast Transit District (GCTD), to identify existing and future HQTAs and HQTAs for Connect SoCal. Should GCTD make future adjustments to planned transit services that result in changes to HQTAs, SCAG will reflect this in the next cycle.</p>
<p><i>Submitted by</i> City of Palmdale Submittal 0001532 Related Documents Link</p>		
0001532.01	<p>Dear Connect SoCal Team: Thank you for allowing the City of Palmdale to review and comment on the Draft Connect SoCal Plan. Please find attached Staff comments.</p>	<p>Thank you for your comment. Comment noted.</p>
0001532.02	<p>Please include the new RHNA allocations within the document as the housing numbers considered throughout are not what was allocated by HCD.</p>	<p>See Master Response #1.</p>
0001532.03	<p>ROW for the financially constrained RTP/SCS for the HDC rail portion should be included, please revise.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>
0001532.04	<p>City Staff highly encourages SCAG to reach a resolution on the EMFAC model as soon as possible to ensure that new projects can be listed on the FTIP.</p>	<p>Comments noted.</p>
0001532.05	<p>Page 60 Please provide AM Peak Speed Map in addition to the PM Peak Speed Map.</p>	<p>The PM peak speed maps were selected for inclusion in the Performance Measures Technical Report because the PM peak period typically represents the most congested period of the day on freeways in the SCAG region. Your request for the addition of AM peak speed maps will be reviewed, pending resource availability.</p>
0001532.06	<p>Page 4 Please consider adding California High Speed Rail to the "Existing & Near-term Emerging Technologies."</p>	<p>While High Speed Rail will be a new addition to our transportation system, the technology itself has existed for decades and is not emerging in the way that we typically use the term at SCAG.</p>

ID	Comment	Response
<i>Submitted by</i>	City of Palmdale	Submittal 0001532 Related Documents Link
0001532.07	Page 4Please consider the addition of Boring Co. to the Medium to Long Term Technologies.	Thank you for your comment. The Boring Company and SpaceX are under the Tesla umbrella. The former is relevant to our plan, but its product is a refinement of a technology which is already in practice. We look forward to continuing to work with The Boring Company and recommending their technology refinements when appropriate.
0001532.08	Page 8Please be consistent in the display of acronym MAAS vs MaaS.	Thank you for your comment. "MaaS" is used in every instance except in headers, when all letters are capitalized.
0001532.09	Page 9 Please explain that PHEVs could be charged and please prioritize the electric motor as opposed to vice versa with regular hybrid vehicles.	Thank you for your comment. The document is not intended to discuss the prioritization of different engine types.
0001532.10	Page 14 Please consider distracted driving.	Thank you for your comment. Distracted driving is discussed in the Transportation Safety and Security Technical Report.
0001532.11	Page 14 AVAQMD also offers \$500 - \$1,000 per AB-1236.	While this section of the technical report is not meant to include a full list of all such incentives, a regional EV incentive strategy would augment existing programs such as the one described.
0001532.12	Page 19 Please consider discussing Green Commuter as they also provide a program.	Unfortunately, although relevant, we could not include examples of all programs.
0001532.13	Page 26 Please consider adding a discussion about injuries to users and pedestrians. Also, it should be noted that some cities are trying to outlaw smart parking.	Thanks for your comment. While the Emerging Technology Technical Report discusses safety ramifications of new mobility options, the Active Transportation Technical Report provides further discussion of pedestrian safety issues.
0001532.14	Exhibit 7 and 8 Palmdale is shown as having "Less than or Equal to 500 jobs per Square Mile" in both 2106 and 2045, please update to reflect current and future projected information provided during the RTP/SCS process.	Per the Local Input Growth Forecast found in Table 14 of the Demographics & Growth Forecast Technical Report, Palmdale's employment total in 2016 is 36,700 and in 2045 is 45,900. With a land area of 106 square miles, Palmdale's employment density would be at this level.
0001532.15	Exhibit 1Please display the bottleneck at SR 14 and I-5.	Thank you for your comment. The I-5/SR 14 interchange did not qualify to be within the top 100 bottlenecks in the SCAG region based on the Caltrans PeMS data.
0001532.16	Page 45 Please clarify and be consistent throughout the document if the Palmdale Transit Center is considered a High Quality Transit Corridor and Major Transit Stop.	Comment noted. The Palmdale Metrolink station, being a rail station, meets the criteria established under applicable state law to qualify as a major transit stop. Major transit stops and high quality transit corridors are discussed in further detail in the Transit Technical Report.
0001532.17	Exhibit 2 Please verify that this standard is per FHWA.	Exhibit 2 is consistent with the Federal Highway Administration's Functional Classification System.
0001532.18	Exhibit 6 and 7 Please provide information about the modeling input values used.	Comment noted. There are a considerable amounts of inputs that go into model runs. It was impractical to highlight all of the model inputs in this report.
0001532.19	Exhibit 1 Please update "Palmdale Air Terminal" to read "Regional Airport PMD."	Comment noted. Exhibit 1 will be changed from "Palmdale Air Terminal" to "Palmdale Regional Airport".

ID	Comment	Response
<p><i>Submitted by</i> City of Palmdale Submittal 0001532 Related Documents Link</p>		
0001532.20	General Please add discussion about the Regional Airport PMD to the document.	Comment noted. Palmdale Regional Airport (PMD) is included (with corrected name) on Exhibit 1 "SCAG Region Airports" map, Table 3 "General Aviation and Reliever Airports in the SCAG Region," Table 12 "SCAG Region Airport Passenger Forecast for Connect SoCal," and mentioned in the discussion in the last paragraph of the "air passenger demand forecast" section. Unfortunately, due to editorial considerations and constraints (e.g. page limits for the technical report and Connect SoCal), the decision was made not to go into detailed description for the general aviation and reliever airports contained in Table 3. Once scheduled commercial passenger service is secured at Palmdale Regional Airport, the discussion and description of PMD will expand along with the other commercial scheduled passenger service airports in the region.
<p><i>Submitted by</i> City of Palmdale Submittal 0001533 Related Documents Link</p>		
0001533.01	Page 14 Please update the EIR/EIS dates for the "Bakersfield to Palmdale", "Palmdale to Hollywood Burbank Airport", "Hollywood Burbank Airport to Los Angeles", "Los Angeles to Anaheim."	Thank you for your comment. Page 14 of the Passenger Rail Technical Report will be edited per the comment.
0001533.02	Exhibit 3 Please also show IOS.	Comment noted. The California High Speed Rail system's Initial Operating System (IOS) is not located within the SCAG region.
0001533.03	Page 17 Please revise this section as: The City of Palmdale is currently preparing a CHSRA TOD Specific Plan, the Palmdale Transit Area Specific Plan (PTASP). The study focuses on the Palmdale Transportation Center (PTC), a multi-modal center that serves Metrolink, Amtrak, Greyhound, VTUSA, and several Antelope Valley Transit Authority lines and the future CA HSR and potential....PTC. The PTASP also includes a real estate and market analysis, value capture, connecting transit and first/last mile facilities.	Page 17 of the Passenger Rail Technical Report will be edited per the comment.
0001533.04	Page 31 The first bullet should be revised as 1A versus 1a.	Thank you for your comment. Page 31 of the Passenger Rail Technical Report will be edited per the comment.
0001533.05	Page 33 Please revise the paragraph beginning with "PMD" to include the existing PTC as well as the future VTUSA and CA HSR station.	Page 33 of the Passenger Rail Technical Report will be edited per the comment.
0001533.06	Page 42 Please update the "Victorville to Las Vegas HSR" section as the bonds have been approved.	This section of the Passenger Rail Technical Report will be edited to reflect the conditional approval by the California Debt Limit Allocation Committee of the XpressWest request for a qualified private activity bond allocation.
0001533.07	Page 42 Please clarify the year the \$45 million was granted under the "California/Nevada Super-Speed Train."	Thank you for your comment. The statement regarding the planning study is an error and will be corrected in the Passenger Rail Technical Report.
0001533.08	Page 24 Please clarify if the PTC is included as a TPAS.	Thank you for your comment. The Palmdale Transportation Center is a Major Transit Stop and High-Quality Transit Area.
0001533.09	Page 77, Table 12Please update Palmdale's ATP to be 2019.	Thank you for your comment. Update will be reflected in Table 12.

ID	Comment	Response
<i>Submitted by</i>	City of Palmdale	Submittal 0001533 Related Documents Link
0001533.10	Exhibit 16 Please include Palmdale within this exhibit.	Thank you for your comment. Through the Local Input and Envisioning Process SCAG attempted to collect updated network data for all member jurisdictions. We would be happy to update our database with the complete network when that information is shared.
0001533.11	Page 132 The boundary of RTP ID 1H0101 should be Palmdale Boulevard.	Please see comment #0001311.01 and linked attachment. Per the public comment submitted by Los Angeles County Metro, the project was requested for removal from the Connect SoCal 2020 RTP financially constrained project list (table 2) and added to the Strategic project list (table 3). See S1H0101 in Table 3 of the Project List Technical report for the listing. Please work with Los Angeles County Metro if revisions need to be made.
0001533.12	Page 133 Please confirm for RTP ID LA962212 that 100th Street is the correct location.	The description for LA962212 has not changed from the 2016 RTP/SCS. 100th Street remains one of the termini for the project. If a revision is needed, please work with Los Angeles County Metro to implement any changes.
0001533.13	Future Project to be included if EMFAC model is not approved:Avenue Q from Sierra Highway to 20th Street East Complete Streets Project - project will focus on multi-modal connectivity to the PTC and future roadway improvements along Avenue Q. \$10-15M.	Comment noted. Please work with your county transportation commission, in this case, Los Angeles County Metro, to incorporate the project in a future RTP and/or FTIP amendment.
0001533.14	Future Project to be included if EMFAC model is not approved:State Route 14 Chokepoint Relief Project - several locations along the SR 14 freeway from Palmdale to Santa Clarita where the SR 14 narrows down. Scope is being determined between City agencies, Caltrans and Metro. Palmdale's intersection would be at Pearblossom Highway and SR 14. Cost is TBD.	Comment noted. Please work with your county transportation commission, in this case Los Angeles County Metro, to incorporate the project in a future RTP and/or FTIP amendment.
0001533.15	Future Project to be included if EMFAC model is not approved:Rancho Vista Blvd/Sierra Highway Railroad Crossing Improvements - project would upgrade the existing UPPR and Metrolink railroad crossing at Rancho Vista Blvd and Sierra Highway. Project is currently being scoped by the City and the CPUC (California Public Utilities Commission). Estimated cost is \$9 million. This project would provide enhanced transit at that intersection along with increased safety and circulation issues.	Comment noted. Please work with your county transportation commission, in this case Los Angeles County Metro, to incorporate the project in a future RTP and/or FTIP amendment.
0001533.16	Almost all of Palmdale is designated by the Federal Government as a Mental Health Provider Shortage Area as well as a Medical Health Provider shortage area east of SR-14. Please ensure that this information is considered as part of this technical study.	Comment noted. SCAG staff acknowledges that every region has unique Environmental Justice (EJ)-related issues and will continue to work with EJ stakeholders to improve on our EJ analysis and ensure that relevant information from each region is considered during the development process for future EJ analysis.
0001533.17	Please note that there was insufficient in-person outreach in the Antelope Valley area - only one meeting in Palmdale for the entire Antelope Valley - also didn't see any meetings in Santa Clarita. There were no local media outlets used for outreach - Antelope Valley Press is the Antelope Valley's only print news and was not on the utilization list, nor were any of the local Antelope Valley radio stations used for advertising or outreach - KMIX, KAVL AM (FOX SPORTS), KCEL (Spanish Language), KKZQ, KQAV, KTPI AM (news talk radio), KUTY AM (Hermosa Spanish music/talk/news).	Comment noted. The outreach conducted after the release of the draft Connect SoCal was done with a mix of briefings and workshops across the six counties (the majority were held in conjunction with Councils of Governments and Transportation Commissions existing meetings). In addition SCAG held three public hearings, a webinar, and Tele Town Hall for public comment. There were representatives from Santa Clarita, Palmdale, Lancaster, as well as local chambers of commerce in attendance. SCAG also had postings in the Antelope Valley Press in the month of December post the release of Connect SoCal. SCAG will take into consideration aforementioned media sources for the next RTP/SCS cycle.

ID	Comment	Response
<p><i>Submitted by</i> City of San Marino Submittal 0001378 Related Documents Link</p>		
0001378.01	<p>The City of San Marino appreciates the opportunity to comment on the draft of the 2020-2045 Connect SoCal plan prepared by the Southern California Association of Governments."Huntington Drive Multimodal Capacity Enhancements" FTIP ID No. LAF7119 is in conflict with the policies previously adopted by San Marino City Council, most recently in August 2019. The project is wholly inconsistent with the City's goals of ensuring a healthy community, safety of San Marino schools, and high quality residential neighborhoods. Consequently, the City of San Marino objects to the project's inclusion in the SCAG 2020-2045 Regional Transportation Plan, and requests its elimination from the Connect SoCal plan and all future iterations of the plan, as well as from the 2020-2045 Regional Transportation Plan and all future iterations of that plan.</p>	<p>Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP update processes. Decisions to delete, replace or modify a project undergo a coordinated process involving the affected county transportation commission and lead agency. Please work with LA Metro to request any changes to LAF7119.</p>
<p><i>Submitted by</i> City of South Gate Submittal 0001318 Related Documents</p>		
0001318.01	<p>Can SCAG provide a presentation on the Connect SoCal Plan at our city to inform local stakeholders?</p>	<p>SCAG staff are available to provide presentations to city staff, constituents, and others about the Connect SoCal.</p>
<p><i>Submitted by</i> City of South Pasadena Submittal 0001534 Related Documents Link</p>		
0001534.01	<p>The City of South Pasadena (City) appreciates the opportunity to review and comment on the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) and associated Programmatic Environmental Impact Report (PEIR).</p>	<p>Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments.</p>
0001534.02	<p>In October 2019, Governor Newsom signed Assembly Bill 29 (Holden) and Senate Bill 7 (Portantino) to remove the State Route 710 (SR-710) freeway stubs located north of Interstate 10 and south of Interstate 210 from the State Highway Code. In addition, AB 29 and SB 7 declared that "any other freeway or tunnel alternative to close the Interstate 710 North Gap shall no longer be deemed as feasible alternatives for consideration in any environmental review process for the Interstate 710 North Gap Closure project..."</p> <p>Furthermore, the Los Angeles County Metropolitan Transportation Authority (Metro) and California Department of Transportation (Caltrans) decision to adopt the Transportation System Management/Transportation Demand Management Alternative for the SR-710 North Project further emphasizes the fact that the SR-710 Freeway Alternative is dead. The City is pleased to see that the description for Federal Transportation Improvement Program (FTIP) project LA710NB and RTP project 1M0101 has been updated to include the TSM/TDM Alternative in the RTP project list. The City recognizes that S1120082 was included in the Strategic Plan to reflect additional projects that have been proposed as SR-710 Mobility Improvement Projects.</p>	<p>Comment noted.</p>

ID	Comment	Response
<p><i>Submitted by</i> City of South Pasadena Submittal 0001534 Related Documents Link</p>		
0001534.03	<p>However, the City is concerned by the inclusion of FTIP/RTP project 18790 (please refer to the below table). The project is described as an “Alternative Analysis, Engineering and Environmental Studies to close 710 freeway gap...” As described, this project is contrary to the Metro and Caltrans decision to move forward with the TSM/TDM Alternative and recent state legislation deeming any freeway alternative for the SR-710 North Project as infeasible. To ensure consistency with state legislation and the Metro and Caltrans decision to move forward with the TSM/TDM Alternative the City requests that project 18790 be removed from the RTP project list. See attached for project list comments.</p>	<p>Project 18790 was submitted by Los Angeles County Metro. SCAG cannot unilaterally remove a project submitted by Metro without their concurrence. Please coordinate with Los Angeles County Metro to delete the project in future amendments to FTIP and/or RTP/SCS.</p>
<p><i>Submitted by</i> City of West Hollywood Submittal 0001416 Related Documents Link</p>		
0001416.01.1	<p>Thank you for the opportunity to provide input on the Draft Connect SoCal plan. The City of West Hollywood is supportive of the Southern California Association of Governments’ (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) vision to promote sustainable development in the region.</p>	<p>Thank you for your comment. Comment noted.</p>
0001416.01.2	<p>To that end, the City of West Hollywood encourages SCAG to actively support our ongoing work with Metro and the City of Los Angeles to accelerate delivery of the Northern Extension of the Crenshaw/LAX transit line through some of the densest and most congested parts of the region including Mid City Los Angeles, West Hollywood, and Hollywood. The Northern Extension project will transform regional mobility by forming a new north-south regional connector enabling tens of thousands of transit riders to avoid the need to travel downtown to transfer by linking five existing Metro Rail lines from the South Bay to the San Fernando Valley. This level of connectivity and access to opportunity will benefit several underserved communities; link countless major employment, entertainment, medical, and cultural centers; and generate ridership in excess of 90,000 daily riders—higher than any light rail line in the Country. Because of these and other project benefits, the Northern Extension project will help the region achieve the RTP’s stated goals of reducing greenhouse gas emissions and vehicle miles travelled while locating employment and density near transit.</p>	<p>The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects. Currently the Crenshaw/LAX line is not expected to be completed until after the 2045 horizon of Connect SoCal. Should Metro identify additional funding to advance the project schedule, SCAG will work with Metro to update Connect SoCal or a future Regional Transportation Plan appropriately.</p>
0001416.01.3	<p>In addition, the City of West Hollywood has revisions to the Draft Technical Report Project List: •FTIP ID LAF9623 – This project is Phase I in a multiphase design district program including several other projects that should also be included. See enclosed Attachment 1 for a revised list of projects to be included in the final RTP/SCS. •FTIP ID LAOG1052 – Remove this project as Metro has selected and is constructing an alignment along Wilshire Boulevard. •Attachment 1 includes a revised list of additional projects to be included in the Final RTP/SCS to reflect our upcoming transportation investments. If you have any questions, please contact Bob Cheung, Senior Transportation Planner, Long Range Planning Division.</p>	<p>Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Please work with your county transportation commission, in this case Los Angeles County Metro, to incorporate the requested modifications in a future RTP and/or FTIP amendment.</p>

ID	Comment	Response
<i>Submitted by</i>	City of Yorba Linda	Submittal 0001557 Related Documents Link
0001557.01	<p>The City of Yorba Linda appreciates the opportunity to review and provide feedback on the draft Connect SoCal Plan and its accompanying Program Environmental Impact Report (PEIR). We especially appreciate the opportunity SCAG provided through the Bottom-Up Local Input and Envisioning Process during 2017-2018. We recognize the significant amount of time, effort, and coordination it takes to put together a plan of this magnitude. Our primary concern with the Connect SoCal Plan is its inconsistency with the draft Regional Housing Needs Assessment (RHNA). Specifically, the City offers the following public comments on Connect SoCal and its PEIR. We recognize that some of our comments are directly related to the draft RHNA methodology; however, we believe that these comments are relevant to Connect SoCal since SB 375 requires that SCAG "identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584." We also recognize that although neither Connect SoCal nor the RHNA have been adopted, as proposed these two plans will be inconsistent with one another. This is significant because Government Code 65584.04(m) requires that RHNA "allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy."</p>	<p>See Master Response #1 regarding the RHNA. For responses related to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001557.02	<p>1) The growth and need forecasted in RHNA is dramatically inconsistent with the draft Connect SoCal growth forecast Section 3.14.1.1 of the draft PEIR defines household as "all the people who occupy a housing unit." This definition includes related and unrelated persons sharing a housing unit, including individuals living in overcrowded conditions. Table 14 of the Demographics and Growth Forecast Technical Report identifies a projected household growth for the City of Yorba Linda of 900 households between 2016 and 2045 (or 31 households per year). However, the draft RHNA projects the need for an additional 2,322 housing units between 2021 and 2029 (290 housing units per year). If RHNA is supposed to be consistent with the development pattern of Connect SoCal and SCAG only projects an additional approximately 250 households (31 units x 8 years) over the eight-year RHNA period for the City of Yorba Linda, why would RHNA project the need for 2,322 housing units over the same eight-year period? Even if it is assumed that all 900 projected households from Connect SoCal would happen by 2029, why would RHNA project the need for 2,322 housing units? Furthermore, according to the 2019 Department of Finance Population and Housing Estimates, the City of Yorba Linda has 861 vacant housing units (3.6% vacancy rate). The City could easily accommodate the projected household growth of 250 households over the eight-year RHNA period through its existing vacant housing units and still have over 600 vacant housing units available without constructing any additional housing units. In other words, the proposed RHNA would essentially require the City to construct an additional 2,322 housing units plus utilize its 861 vacant housing units (a total of 3,183 housing units) to accommodate a projected population growth of 1,644 people and a projected household growth of 250 for the eight-year RHNA period. This is in direct conflict with Government Code Section 65080(b)(2)(B) and Government Code Section 65584.04(m) that require that Connect SoCal and RHNA be consistent with one another. Ironically, it is actually the SCAG staff recommended RHNA methodology from November 7, 2019, that much more closely aligns with the growth forecast and development pattern found within the Connect SoCal Plan.</p>	<p>See Master Response #1. For responses related to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	City of Yorba Linda	Submittal 0001557 Related Documents Link
0001557.03	<p>2) It is also important to point out that Section 3.14.1.2 (Existing Population, Housing, and Employment) of the draft PEIR identifies four guiding principles that were not properly updated to reflect the latest draft from the October 17, 2019 Technical Working Group (TWG). The first principle should state, "The preferred scenario will be adopted at the jurisdictional level, and directly reflects the population, household and employment growth projections that have been reviewed and refined with feedback from local jurisdictions through SCAG's Bottom-Up Local Input and Envisioning Process. The preferred scenario maintains these locally informed projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction." The draft RHNA differs from the Connect SoCal growth forecast. As proposed, the projected household growth from Connect SoCal will be redistributed from one jurisdiction to another through the RHNA methodology, which conflicts with SCAG's guiding principle of not reallocating growth from one jurisdiction to another.</p>	<p>See Master Response #1. For responses related to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001557.04	<p>3) Sections 3.11.2.2 and 3.14.2.2 of the PEIR are incorrect in the explanation of RHNA. Pages 3.11-33 and 3.14-14 both state, "The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment." Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." Furthermore, one of the five objectives of RHNA is "promoting infill development. . . the encouragement of efficient development patterns . . ." (see Government Code Section 65584(d)(2).4) Pages 3.11-33 and 34 and page 3.11-15 of the PEIR state, "Per SB 375, the projected need's portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period." SB 375 requires that the RHNA, which includes both existing and projected housing need, be consistent with the Connect SoCal for the comparable period (see Government Code Section 65584.04(m)). RHNA should "allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy." Please revise the explanation to state that the RHNA (including existing and projected need) will be consistent with the Connect SoCal.</p>	<p>See Master Response #1. For responses related to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001557.05	<p>5) Page 3.14-16 of the draft PEIR states, "The SCS must accommodate the projected need portion of the 6th Cycle RHNA." This statement is misleading in that Government Code 65080 states that the SCS must "identify areas within the region sufficient to house an eight-year projection of the regional housing need[existing and projected need] for the region." The PEIR also states, "While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process." While the development pattern for the projected need portion of the RHNA (approximately 505,000 housing units) is clearly outlined in the PEIR and Connect SoCal Plan, the development pattern for the remaining approximately 835,000 housing units for "existing need" (approximately 62% of the total housing need) is not addressed in any specificity in the PEIR. For the City of Yorba Linda, it is completely unreasonable to assume that 2,322 new housing units are necessary to accommodate approximately 250 households through the upcoming RHNA cycle, or even to accommodate 900 households through 2045.6) If the PEIR is supposed to evaluate the 'overall impacts of transportation projects and land use strategies described in the Plan' and to evaluate reasonable alternatives, the RHNA methodology is a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing. The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the 'Residual' in the RHNA calculations. Therefore, wouldn't the draft RHNA methodology need to be evaluated as a reasonable alternative within the PEIR?</p>	See Master Response #1.
0001557.06	<p>7) Exhibit 1 of the Sustainable Communities Strategy Technical Report is described as "the growth vision and the forecasted regional development pattern." This exhibit is confusing and needs a better explanation. For example, do darker shades of blue represent higher priority growth areas?8) Page 48 of the draft Connect SoCal Plan describes "absolute constraint areas" but the term is not defined within the glossary. Please include a definition for this term.</p>	Comment noted. A more detailed explanation of Exhibit 1 has been added to the text in the Growth Vision section of the Sustainable Communities Strategy Technical Report. The term "absolute constraint area" has been added to the glossary.
0001557.07	<p>9) Several exhibits throughout the Plan and Technical Reports show the 1-5 corridor between Anaheim and Mission Viejo as a High Quality Transit Area (HQTA); however, that corridor does not currently have any HQTA. Furthermore, the proposed Bus Rapid Transit (BRT) has not even had specific stop locations identified or evaluated by Orange County Transportation Authority (OCTA). Therefore, referring to the entire corridor as a HQTA is not appropriate. Please remove this from all exhibits.</p>	Thank you for your comment. The I-5 BRT project was identified to SCAG by the Orange Country Transportation Authority as a future high quality transit corridor consistent with the applicable statutory definitions provided under the California Public Resources Code. The Final Connect SoCal will reflect HQTA maps that do not include QTAs along freeway segments that do not have transit stops and are not accessible to transit riders. The definition of QTAs will be updated in the Final Connect SoCal to clarify that freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTA.

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0001557.08	<p>10)The City also supports the comments made by the Orange County Council of Governments and Cal State Fullerton's Center for Demographic Research.The City recognizes and appreciates the time and effort provided by everyone on this important and complex issue and for your consideration of these items. As far as we understand, this will be considered by the Regional Council on March 5, 2020. We also understand that at this same meeting the Regional Council will be discussing the RHNA methodology and RHNA appeals procedures. It is absolutely imperative that there is sufficient time for the Regional Council to discuss any questions or concerns with the Planand its PEIR as well as the RHNA methodology and appeals. In order to avoid another rushed meeting agenda where Regional Council members are denied the opportunity to ask questions and provide comment, we strongly encourage SCAG to either reschedule the RHNA discussion to another date or extend the length of the meeting.</p>	See Master Response #1.
<i>Submitted by</i>	Climate Resolve	Submittal 0001558 Related Documents Link
0001558.01	<p>Re: Aerial Rapid Transit - SUPPORTTo Whom It May Concern:The Draft Connect SoCal plan continues the work Southern California Association of Governments ("SCAG") began in 2011 with the development and eventual adoption of its first combined Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") in 2012, and an update adopted in 2016. Those two precedent documents provided an assessment of our region's ability to meet its greenhouse gas emission reduction targets. However, as the Connect SoCal plan ("Plan") makes clear:"...we may potentially fall short of our 2020 target for greenhouse gas emission reductions, the core metric by which our region's sustainability is judged. Transit ridership is falling, despite billions of dollars in investment and increased development in station areas."Indeed, despite billions in capital spending transit ridership continues to fall and automobile ownership continues to rise. Yet, strategically, there are examples of projects that embody the needed connectivity and choice ridership the Plan calls for:"...our 2018 transit ridership study with the University of California Los Angeles Institute of Transportation Studies found that if one out of every four people (who rarely ride transit) took transit just twice a month, it would more than make up for the region's lost ridership."</p>	Thank you for your comment. Transit agencies have already been implementing service changes and other strategies to improve transit ridership, such as OCTA's Transit Master Plan and OC Bus 360, and Metro's NextGen Study. Connect SoCal identifies significant investment across all transit modes, including increased transit service levels supported by \$173.9 billion in operations and maintenance investment and \$66.8 billion in capital projects, as described in Chapter 3 of the Connect SoCal main report.

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<i>Submitted by</i>	Climate Resolve	Submittal 0001558 Related Documents Link
0001558.02	<p>One of the “Key Connections” moving forward in our region is the Aerial Rapid Transit (“ART”) project, the aerial gondola that will connect Los Angeles Union Station (the region’s transportation hub) to Dodger Stadium and the surrounding communities and environs. This fully privately funded project is truly the “...intersection of land use, transportation and technology...” SCAG calls upon to “...close the gap and reach our greenhouse gas reduction goals.”The ART can carry 5,000+ people per hour per direction on this transit system and can do so quietly and without carbon emissions as the ART is electric, and located in LADWP service territory which is rapidly moving to 100% renewable sources. The ART sponsor, Aerial Rapid Transit Technologies LLC (“ARTT”) is fully funding the ART and has entered into an agreement with the Los Angeles County Metropolitan Transportation Authority (“Metro”) to process environmental clearance for the Project. Under the current timetable, the ART can be operational by 2023 and anticipates removing over 3,000 cars from Dodger Stadium events. That equates to a roughly 20-25% reduction in existing automobile trips per average Dodger Stadium event.The ART will also provide presently non-existent transit access to surrounding communities and to a major recreational asset in this part of the region: Elysian Park. Indeed, the ART is a proven technology, is “clean and green”, and provides a prototypical opportunity for replication in certain parts of the SCAG region where connectivity and access are lacking. It is, indeed, one tool in our toolkit that should not be ignored and specifically referenced in the Connect SoCal plan.Last, we wish to include an illustration, see attachment, which presents two future visions of Los Angeles. One scenario projects a city cursed with extreme heat and rotting infrastructure, while the other is lively, pedestrian and park friendly, with aerial rapid transit deployed as a means to moving Angelenos around the region. We hope SCAG selects this more hopeful vision.In sum, Climate Resolve urges that the ART be profiled in the Connect SoCal plan as an innovative connector, and that the TPA and HQTAs designations apply to the property.</p>	<p>Thank you for your comment. SCAG supports innovative transportation solutions such as the ART project, as well as public/private partnerships (PPPs) to delivering these transportation solutions. SCAG coordinated with the county transportation commissions to identify projects for consideration in Connect SoCal and will continue working with Metro to consider projects such as ART for inclusion in future updates to Connect SoCal.</p>
0001558.03	<p>Finally, based on SCAG’s criteria for a Transit Priority Area (“TPA”) and for a High Priority Transit Area (“HPTA”) of a fixed-guideway, high-capacity transit stop, the ART to Dodger Stadium meets the definitional criteria of both TPA and HQTAs given the direct connection of the ART to Union Station. Moreover, when coupled with the extension of the Figueroa Street multi-modal (transit, bicycle, pedestrian) corridor north to Dodger Stadium that is already included in the RTP per amendment submitted by Metro, this further underscores the viability of both expanded TPA and HPTA designations. More and more, our sports and entertainment venues need to be viewed with an eye towards multi-modality and land use/transportation integration as they are major opportunities to address the choice rider.</p>	<p>Thank you for your comment. SCAG coordinated with the county transportation commissions to identify projects for consideration in Connect SoCal and will continue working with Metro to consider projects such as ART for inclusion in future updates to Connect SoCal. At such time ART would be assessed with respect to the methodology for identifying major transit stops and high quality transit corridors, which form the basis for HQTAs.</p>

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<i>Submitted by</i>	Diamond Bar Pomona Valley Sierra Club Task Force	Submittal 0001543 Related Documents Link
0001543.01	<p>Thank you for the opportunity to comment on the Southern California Association of Governments 2020 Regional Transportation Plan and Sustainable Community Strategy, collectively called Connect SoCal. The Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter, has worked since 2018, to recognize, conserve and restore wildlife habitats, corridors and natural resources in the City of Diamond Bar and surrounding areas. We wholeheartedly believe in first, “doing no harm” to existing natural lands conditions, whilst prioritizing “natural climate solutions” through the conservation and restoration of local green belts, watersheds, residential landscapes, parks and open spaces. Our task force is proud to participate in the growing SCAG plan coalition in 2020. The Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter, is a community service/public benefit non-profit group, serving Los Angeles County, and the cities of Diamond Bar, Pomona, Walnut, Rowland Heights, La Verne, Claremont, San Dimas, Glendora and Chino Hills. Our mission is to educate, advocate environmental literacy and ecological integrity at the local level in conserving wildlife habitats, natural landscapes, watersheds, wetlands, California Native residential gardens, public parkland and natural open spaces. We have had important successes since our inception, including the official mapping of rare and endangered species (California Gnatcatcher, Cactus Wren, Golden Eagle) in the City of Diamond bar, and creating a conservation element report: City of Diamond Bar Biological Resources Report by Hamilton Biological, which informs the city’s 2040 General Plan update.</p>	<p>Thank you for your comment. SCAG will continue to work with this important stakeholder group in order to implement conservation strategies listed in Connect SoCal.</p>
0001543.02	<p>We offer the following comments on the Natural and Farmland policy, goals, and next steps. Natural Communities Map Correctives At reviewing the PEIR and Natural & Farmlands habitat, special status species and wildlife movement maps, we noticed your data does not include the latest, updated biological information for the City of Diamond Bar, SEA 15 and the surrounding natural land areas. We request that your drafts be corrected and updated by referring to the attached biological report and map, “City of Diamond Bar Biological Resources” report and “City of Diamond Bar, Natural Communities” map, dated February 25, 2020. These documents are referred to in the city’s recently adopted General Plan 2040 and are on record with the California Dept. Fish Wildlife Region 5 and the United States Fish and Wildlife Service.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001543.03	<p>Most notable updates should include the special status species “California Gnatcatcher,” which maps an old, established populations distributed throughout the city due to its quality coastal scrub habitats.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	Diamond Bar Pomona Valley Sierra Club Task Force	Submittal 0001543 Related Documents Link
0001543.04	<p>Prioritizing Natural Climate Solutions We are pleased to see conservation of our natural and agricultural lands as one of the 10 main policies of Connect SoCal. Land preservation not only reduces greenhouse gas (GHG) emissions, but also sequesters carbon. Any investment in habitat restoration improves this sequestration potential as well. Natural lands (green infrastructure) are a proven “natural climate solution” and key to preserving quality of life and authentic community sustainability. We believe including land conservation is a step in the right direction. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.</p>	Thank you for your comments.
0001543.05	<p>Mechanisms for Saving Natural Open Spaces – Wildlife Habitats Our organization supports the idea that as new growth occurs it should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe. However, the Plan fails to outline precisely how (or with what conservation mechanism) these fringe lands (or any lands) will actually be protected. Relieving pressure by focusing development elsewhere, does not automatically conserve or protect natural lands. A growing alliance of numerous organizations, including ours, focus work on protecting important habitat lands. Much time, energy, money, strategy, and political will are combined to create a successful conservation transaction that leads to permanently-conserved lands. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.</p>	Thank you for your comment. Suggested mechanisms for conservation are listed in Chapter 3 of Connect SoCal as well as in the Natural & Farmlands Conservation Technical report. Additionally, Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and support long-term management and stewardship of mitigated properties.
0001543.06	<p>The Benefits of Conservation Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, protection of cultural and archeological sites, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands also filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water resources.</p>	Comment noted.

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<i>Submitted by</i>	Diamond Bar Pomona Valley Sierra Club Task Force	Submittal 0001543 Related Documents Link
0001543.07	Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain ecological functions, be sustainable over the long term, and include plans for long-term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Natural landscapes are neglected due to regarding landscapes from only “aesthetic uses” attitude. Realizing the big picture by ensuring open spaces are connected to one another is essential for species survival and building authentic, sustainability. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as drought, fire, flood or landslide, and improve the resiliency in the face of climate extremes impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors prior to commencing impactful projects.	Thank you for your comment. SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Furthermore, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."
0001543.08	Coastal & Riparian Assets Many non-profits are working to ensure additional bays, estuaries, wetlands, bluffs, and beaches are preserved forever. Additionally, one way our coasts are connected to inland areas are through our watersheds, rivers and streams. These riparian areas serve as recreational trail corridors, water recharge and infiltration locations, and serve as places our wildlife use for watering sources. However, transportation and land use generated urban runoff are still problems. Our beaches and coastline are inundated with pollution. Litter, debris, and pollutants should be decreased prior to reaching the coast. Ensuring everyone has a positive experience on the sand and in the surf should be our goal, but we need to address Southern California’s trash problem.	Thank you for your comment. Comment noted.
0001543.09	The Benefits of Habitat Restoration California is one of 36 biodiversity hotspots on earth! This means, the unique ecosystem diversity of our state is rare and one of the most threatened by human activities. The health of California ecosystems affects the globe for good or ill, as well as local communities. One key way to improve the environment is through restoration projects. These can be on land, in riparian areas, and even in the ocean. Restoration provides benefits by adding native plants, removing the non-native plants and their seedbank, as well as increasing carbon storage, and providing improved habitats for our wildlife. Our environment benefits from these improvements, as do our watersheds, our air, and our communities. Having improved habitats means that our water is cleaner, our soils won’t erode as easily, it creates jobs for local residents, and our unique biodiversity is maintained. Further, the many endemic and threatened/endangered plants and animals benefit from these restoration projects as well. Thank you for including restoration as a key component in the natural lands and agricultural policy.	Thank you for your comment. Comment noted.
0001543.10	Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix.	Thank you for your comment.

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001535 Related Documents Link
0001535.01	<p>Friends of Harbors, Beaches and Parks (FHBP) has been engaged with the Southern California Association of Governments (SCAG) for many years—most recently through its ongoing Natural Lands Working Group. In 2012, we formed a coalition that promoted open space policies and regional advance mitigation programs (RAMPs) at the SCAG level. These policies were ultimately adopted by SCAG leadership in the 2012 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This was done a second time with the 2016 RTP/SCS. We are pleased to gain a broader, more inclusive, and geographically diverse coalition for the 2020 Plan (Connect SoCal) and though we have substantive comments below, we are supportive of the 2020 Connect SoCal Natural and Farmlands policies. While FHBP mainly focuses its work in Orange County, we have been able to relay our experiences with the successful RAMP under the Orange County Transportation Authority’s (OCTA) Renewed Measure M to other county transportation agencies in California. Measure M2’s Environmental Mitigation Program has permanently protected 1,300 acres and restored nearly 350 acres throughout Orange County. This innovative program enables 13 freeway projects to collectively mitigate impacts with large landscape-level mitigation, instead of small individual project-by-project mitigation efforts. It streamlines the environmental review and permitting process, allows projects to come in under budget, builds a positive working relationship with resource and permitting agencies, allows more thoughtful science-based conservation planning to occur, and is supported by many conservation and community organizations. This, and our involvement in the creation of the Natural Lands Policy in the 2012 Orange County SCS, drew our attention and focus to the SCAG RTP/SCS and opportunities for a more regional effort there. We are grateful to be involved in the process and to have developed an excellent working relationship with SCAG leadership and staff.</p>	Thank you for your comment.
0001535.02	<p>We support the focus of “Fit it First” and encourage local transportation agencies to stop building new roads. History has shown that building new roads or widening freeways and roads does not solve the traffic problem—it simply allows more single occupant vehicles to be on the road, which SCAG is trying to avoid to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).</p>	Comment noted.
0001535.03	<p>It is exciting to see new tools such as tax increment financing included in the plan. However, there was a missed opportunity in the Executive Summary and throughout the Plan itself. We believe that tax-increment finance districts can and should be used to fund open space conservation. Our parks and open spaces are part of the community infrastructure that our taxes support—as the cities grow, so will our need for more parkland. Further, most cities do not meet the requirements of the Quimby Act. The 1975 Quimby Act established a statewide requirement that developers set aside land, donate conservation easements, or pay fees for park improvements (called park in lieu fees). Many jurisdictions have enacted local ordinances that require the maximum number of park acres per person under the Quimby Act - or 5 acres per 1,000 residents. As more houses are built and more land is used, more parkland will be needed as well.</p>	Thank you for your feedback. SCAG recognizes that one of the strengths of tax increment financing is the ability to fund public facilities - parks and conservation lands, specifically. To help fulfill the Core Vision of Connect SoCal, SCAG is actively working to promote the use of Neighborhood Infill Finance Transit Improvements Act (NIFTI #2) districts, which require a set aside for parks and open space.

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0001535.04	Proposed Policy Modification (Plan, Pg. 49) Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure, including parks and open space, and development projects.	Thank you for your suggestion. SCAG included Enhanced Infrastructure Financing Districts and other tax increment financing tools as a "Key Connection" under the category of Housing Supportive Infrastructure. To help implement the Core Vision of Connect SoCal, SCAG will be providing technical assistance and resources to expand activities to support local agencies in establishing self-help tax-increment financing districts.
0001535.05	Similarly, the comment about value capture tools and financing also applies to the "Support Implementation of Sustainability Policies" in the SCS (Pg. 27 & 29), as parks are part of our community infrastructure. Proposed Modification (SCS, Pg. 27) Support cities in the establishment of EIFDs, CRIAs, or other tax increment or value capture tools to finance sustainable infrastructure, including parks and open space, and development projects. Proposed Modification (SCS, Pg. 29) TIF is an important tool in the creation of sustainable communities, and NIFTIs specifically can fund multifamily affordable housing, transit capital projects, transit-oriented development, complete-streets capital projects, parking, parks and open space, and programs to reduce GHG emissions and VMT within TPAs.	Comment noted. Please see the Sustainable Communities Strategy Technical Report for updated text.
0001535.06	We appreciate the effort to locate housing, jobs, and transit closer together and in priority growth areas, while simultaneously preserving natural resources and farmlands. It was great to see this consistent thread woven throughout the document.	Thank you for your comment.
0001535.07	When reviewing the 10 priorities of the Connect SoCal Plan, we noticed that the preservation of natural resources and farmlands actually aligns well with several other goals including: 1. Encourage regional economic prosperity and global competitiveness. 5. Reduce greenhouse gas emissions and improve air quality. 6. Support healthy and equitable communities. 7. Adapt to a changing climate and support an integrated regional development pattern and transportation network. Often one policy can support another, and this can be accomplished with the goal of conservation.	Thank you for your comment.
0001535.08	As the Plan was being developed, participants (FHBP included) in the planning workshops were asked to review four potential growth scenarios and strategies that go with those scenarios. Unfortunately, we found this exercise inequitable because not all growth scenarios apply to every geography in the SCAG region and therefore the strategies cannot apply equally across the region either.	Comment noted.
0001535.09	For example, in a very urban area, creating an urban growth boundary or setting aside land for conservation is not feasible or realistic. However, those actions could work in areas that are still bordered by natural lands and are more suburban or rural. Different geographies need different strategies and different conservation tools. We hope that, in the next scenario development exercise in 2023, this will be considered and therefore make the exercise more realistic.	Thank you for your comment. Your suggestion for will be taken into consideration for the Final Connect SoCal.

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<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001535 Related Documents Link
0001535.10	Accordingly, we make the following suggestion: Solution for Future Plan ExercisesBe cognizant of the tools provided and how they will or will not apply to each land use type. For example, tools used in an urban geography are likely not the same as those used in a rural geography.	Thank you for your comment. Your suggestion will be taken into consideration for the Final Connect SoCal.
0001535.11	We appreciate acknowledgement in the document that our habitat lands face severe development pressure and that those same lands are a valuable asset to our region, residents, and visitors. However, the document implies that construction, infill, and other “development based” activities are the only activities to generate economic growth. It is important to note that our natural lands and agricultural industry are also economic engines for the region. For every dollar invested in conserving natural lands, an estimated \$2.37 is generated through local sales, recreation purchases, gas, and snack/food purchases from outdoor enthusiasts. This is significant in its own right	Thank you for your comment. Connect SoCal points to the importance of natural and agricultural lands to the region's economy in Chapter 2 of Connect SoCal as well as in the Natural & Farm Lands Technical Report.
0001535.12	We commend cities and counties that prioritize conservation of our open spaces. Between acquisitions, policy adoption, mitigation measures, and public-private partnerships, local and regional governments have been successful at adding natural lands to the inventory.	Thank you for your comment.
0001535.13	Here are a few of those examples:• Laguna Beach residents (Orange County) taxed themselves decades ago to fund what essentially became an urban growth boundary around the city to protect their quality of life by purchasing hillsides. • In San Bernardino County, efforts are currently underway to create a Regional Conservation Investment Strategy that closely links appropriate development locations with priority conservation areas. • In Los Angeles County, a newly updated ordinance focuses on areas in need of more protection due to sensitive natural resources through an updated Significant Ecological Area layer. • In Ventura County, residents passed Save Open Space and Agricultural Resources (SOAR), which includes a series of eight voter initiatives that require a majority vote of the people before agricultural land or open space can be rezoned for development. • Both Riverside and Imperial Counties have implemented thoughtful conservation plans that aim to protect thousands upon thousands of acres as development and transportation projects advance.	Comment noted.
0001535.14	While cities and counties participated in land preservation, conservation based non-profits have also contributed, delivering numerous park bonds, public and private conservation dollars, and acquisition and restoration projects that benefit our region. It is a disservice to limit acknowledgement of the conservation efforts to only municipalities.	Thank you for your comment. SCAG acknowledges the contributions to conservation made by non-profit entities. SCAG will continue to work with stakeholders in order to implement conservation strategies listed in Connect SoCal.
0001535.15	Proposed Modification (Plan, Pg. 36) Many counties, cities and conservation groups in Southern California have excelled in their work to protect these vulnerable lands, but few plans or policies have been enacted to preserve habitat and farmlands on a regional scale.	Appropriate edits are reflected in the Final Connect SoCal to address this comment.
0001535.16	Proposed Modification (N&FL Appendix, Pg. 4) For the past several years, many of the SCAG region’s local governments, public agencies and conservation groups have taken action to conserve natural and farmlands through a number of policies and programs.	Appropriate edits are reflected in the Final Connect SoCal to address this comment.

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001535 Related Documents Link
0001535.17	<p>We hope that the Sustainable Community Strategies, specifically those listed in the Green Region, can be implemented across the Southland. The Plan’s goal is to “avoid growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas, and flood plains” (Pg. 55). We fully support this, but remind SCAG that all of Southern California is part of the California Floristic Province—making the entire geography a “biodiverse area” that is threatened with development.</p>	Thank you for your comment.
0001535.18	<p>Further, many of our state and federally listed threatened and endangered species reside in our (protected and unprotected) natural areas. Decisions about what happens to the landscape (land use conversion) where these sensitive species live starts with local land use planners. Efforts are underway to list additional species on the California endangered species list, including the subspecies of mountain lion found in the Santa Ana Mountains. Without connections between open spaces, this local cougar population will face the genetic consequences of inbreeding and will eventually the population will die out. Again, these connections between open spaces come back to land use decisions.</p>	<p>Thank you for your comment. SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Additionally, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to: "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation." For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001535.19	<p>While we appreciate the link this plan provides between environmental mitigation and transportation planning (Pg. 58)—it is high time that all infrastructure projects provide that link. RAMPs should also be incorporated for water, electric, solar, wastewater, natural gas, and other infrastructure. All of these projects have environmental impacts. As an example, the Central Valley and Sacramento Valley RAMP Pilot Program linked both road and water projects in a RAMP. We are asking SCAG to expand the list in this section to more than just transportation projects so that the impacts of all projects are thoughtfully and comprehensively mitigated.</p>	This suggestion will be considered as the Regional Advance Mitigation Program (RAMP) is developed.
0001535.20	<p>Accordingly, we propose the following modifications: Proposed Modification (Plan, Pg. 58)</p> <p>Advance mitigation also benefits all agencies with a more efficient permitting process, as well as reduced cost escalation and project delay. Regional advance mitigation planning takes this concept further and establishes inventories of anticipated impacts from infrastructure projects across the region.</p>	Thank you for your comment. Appropriate changes are reflected in the final Plan to address this comment.

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001536 Related Documents Link
0001536.01	We agree with the statement made on page 150: “Real progress can be made towards sustainable results over the next twenty-five years if cities and counties are equipped with sufficient resources and practical tools.” Unfortunately, we have found in our interactions with local cities and the County of Orange, that not only do their general plans not support this concept, but neither do the zoning codes. Further, in many instances, the planners, planning commissions, and city councils/boards of supervisors do not have a clear understanding of what “sustainable” actually means. SCAG is in a perfect position to serve as a clearinghouse for innovative policies, programs, sustainability efforts, etc., through its Toolbox Tuesday webinars or other training opportunities. As they say, “you don’t know what you don’t know.” We strongly recommend that SCAG use its regional leadership position and resources to teach, train, and educate.	Comment noted.
0001536.02	We agree that development is occurring at the fringes of the urbanized region and in many instances these are places that (1) burn frequently, (2) lack appropriate infrastructure for houses, and (3) promote the single occupant vehicle habit. We suggest providing information to local cities and counties about how these fringe developments add GHG and VMT and that conservation of that land reduces those impacts. A landowner’s decision to sell their land for conservation supports private property rights and local control.	Thank you for your comment. SCAG is currently developing a Regional Climate Adaptation Framework to help our member cities plan and prepare for the effects of climate-related issues such as increased wildfires. If you are interested in learning more about the framework, adaptation planning, and upcoming events please reach out to us at adaptation@scag.ca.gov to be added to our list.
0001536.03	As it relates to the climate change issues raised (Pg. 3)—we appreciate your acknowledgement of these issues (extreme heat, sea level rise, wildfire frequency, and changing rainfall levels). However, we are concerned at how the NIMBY (Not in my Backyard) and public opposition to projects was framed in the SCS. While we are aware that residents may oppose projects for any number of reasons, but finger pointing to NIMBYs as the problem isn’t helpful.	Comments noted.
0001536.04	Trust in government is at an all-time low, and yet resident engagement is increasing. Any local opposition is tagged NIMBYism. And, the connotation behind the word “public” remains negative. Often times, residents’ main goal is to achieve a balanced policy solution to their concerns, and local activism on a controversial project should be seen as an opportunity for convening a public policy discussion on key issues. It appears that what decision makers perceive as frustration by the public is really a lack of tools deployed to resolve the issues. Training opportunities for decision makers exist that could help bridge this gap are offered by the Public Policy Institute of Pepperdine, as one example.	Comment noted. SCAG refers to "NIMBYism" (Not-in-my-backyard) in the context of challenges raised by stakeholders.
0001536.05	Further, every city in the SCAG region should have a goal to become a “responsive government” that pays attention to the residents, businesses, and visitors. Engaging the residents in goal setting is essential to creating a shared outcome that aligns the community, business, and city’s interests—a view everyone can support. A good public process includes not only results in a cost effective, timely, and goal-oriented process, but it also considers the culture and history of the topic. The latter seems to be consistently missing from the dialogue. Further, adhering to the policies set in the general plan or zoning code need to be followed or the expectations about a project shift based on the whim of the project applicant.	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001536 Related Documents Link
0001536.06	<p>Residents, businesses, developers, decision makers, and staff all use the governing general plan as tool for understanding what is in store for the community now and in the future. This “rule book” is like a compact between developers, the local government, and residents. It sets the stage for future development and change and offers predictability. Residents often find themselves at odds with projects because developers ask for modifications to the “rule book.” In other words, what the developer wants is not what is codified in the general plan, and so they opt to change the plan—instead of changing the project. This changes the playing field for every project and makes the work that has gone into the general plan moot. Perhaps more importantly, the community’s compact with the governing agency is broken and trust can be lost.</p>	Comment noted.
0001536.07	<p>There are many instances where we (the “public”) provide numerous solutions to the problems a particular development faces—and when it comes time to vote on a project, our leaders ignore those suggestions. If there were better training for elected officials on how to interact with the public, address concerns, and listen—many of the issues could be resolved. This type of “blind eye” mentality only perpetuates the “blame game” that public involvement is bad and only leads to opposition.</p>	Thank you for your feedback. Comment noted. SCAG continues to assess how to better engage its elected membership through SCAG’s Regional Council and various Policy Committee activities and presentations.
0001536.08	<p>Within the “Final Growth Vision” (Pg. 22) the SCS states: “ ...decisions about how growth will actually occur are up to each local jurisdiction.” In other words, the cities can ignore the goals of this plan and do what they want. This is why our point about educating the local jurisdictions about opportunities related to transportation, housing, land use, and conservation are so very important. It is more difficult to ignore good policy when you understand it and its impacts.</p>	Comment noted.
0001536.09	<p>One of the items that seems lacking from the “Protect the Environment and Conserve Natural Resources” section (Pg. 24) is that when land is consumed (converted from greenfield to urban uses), GHG emissions and VMT are increased. This should be acknowledged—or alternatively state that leaving natural lands in their existing state sequesters carbon instead of emitting carbon. We suggest the following modifications: Proposed Modification (SCS, Pg. 24) By contrast, a pattern that places a greater share of new growth in dispersed standard development patterns consumes more greenfield land. Additionally, converting greenfield and agricultural lands typically adds GHG and VMT to the region.</p>	Thank you for your comment. Connect SoCal recognizes the importance of conservation for preserving carbon sequestration opportunities. The Natural & Farm Lands Technical Report addresses carbon sequestration on page 3.
0001536.10	<p>We support the approach to this plan to avoid high hazard areas for wildland fires, sea level rise, flooding, etc. The less we build in those locations, the less we have to defend them and rebuild them in the future. Within the “Promote a Green Region” (Pg. 27), “reducing consumption of resource areas, including agricultural areas” does not actually protect the land. The conservation mechanism is missing.</p>	Thank you for your comment. Suggested mechanisms for conservation are listed in Chapter 3 of Connect SoCal as well as in the Natural & Farmlands Conservation Technical report. Additionally, Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and support long-term management and stewardship of mitigated properties.
0001536.11	<p>Proposed Policy Modification (SCS, Pg. 27) “Protect resource areas, including agricultural land.” This gets at the same intent (not converting it to urban uses), but actually takes the step forward of protecting it so the possibility of future potential conversions never has to happen again</p>	Thank you for your suggestion.

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001536 Related Documents Link
0001536.12	Page 29 covers the “Tools” that can be used to help with sustainable placemaking, specifically urban heat island reduction. This component easily benefits disadvantaged communities throughout the Southland and should be incorporated as a tool for the Environmental Justice Appendix. Inclusion of trees makes urban areas cooler, provides more shade for those on bike or foot, improves the sense of community, and cleans the air.	Comment noted. Similar strategies and tools listed in the Sustainable Community Strategies Technical Report are also presented in the Environmental Justice (EJ) Toolbox of the EJ Technical Report. For example, recommended practices and approaches regarding heat island effect can be found in two sections of the EJ Toolbox: Active Living, Active Transportation, and Physical Activity and Climate Vulnerability and Resiliency. However, because the EJ Toolbox is meant to be a dynamic document, it will change over time to include relevant practices and approaches and stakeholder input.
0001536.13	FHBP supports, in full, the absolute constraint (Pg. 32) that growth cannot or should not occur in existing open spaces or on conserved land. We would urge that easement lands and mitigation sites also get included in this list. As for the variable constraints, we agree with this list as well— especially the inclusion of wildland-urban interface and wildfire prone areas (Calfire Very High Fire Severity Zones). Proposed Policy Modification (SCS, Pg. 32): Conserved and easement lands, as well as mitigation site.	Comment noted. SCAG will consider revisions to the constraints for future plans and will seek feedback from the regional planning working groups to further refine these data sets and policies.
0001536.14	On Page 33, the list of Data and GIS Maps referenced in this document are helpful. We’d offer the California Conservation Easement Database (CCED) as a future tool. It can be found at: https://www.calands.org/cced/ .	SCAG is familiar with the CCED and has referenced it for other efforts. It was decided not to be used for Connect SoCal, because while it is a useful tool, accuracy of the data varies greatly because many private holdings cannot be verified.
0001536.15	Within the Demographics and Growth Forecast Appendix, it states: “Following public input and SCAG’s analysis of the GHG/VMT benefits of the alternative scenarios, a preferred growth forecast scenario was chosen which prioritizes growth in areas such as job centers and transit priority areas which have regional transportation benefits. (see EXHIBITS 1-9).”	Thank you for your comment. Comment noted.
0001536.16	Exhibits 1-9 appear in conflict with the description of the “absolute constraints.” For example, the absolute constraint of not building in existing open spaces or on conserved lands (as described in the SCS, Pg. 32) conflicts with the growth forecast areas. We recognize these growth forecasts were built using the transportation area zones (TAZ) and those zones that do not necessarily align with boundaries of conserved lands, but, these maps provide a false projection of growth in the region and within specific TAZs. The map should depict what is and is not an area of absolute constraint to align with what has been stated previously about where growth can and cannot occur.	Thank you for your comment. Maps in the Demographics & Growth Forecast Technical Report are presented as jurisdictional totals only, reflecting the Guiding Principles (see page 27) which state that Connect SoCal is adopted at the jurisdictional-level only. More detailed maps of constraint areas are provided in Chapter 3 of the document’s main book.
0001536.17	FHBP supports the inclusion of natural and farmland preservation as a tool to reduce GHG and VMT. However, we are concerned that the goal of “Promote conservation of natural and agricultural lands and restoration of habitats” lacks the specific actions needed to actually conserve land.	Thank you for your comment. Land use planning tools that promote conservation including Transfer of Development Rights (TDR) are included in Chapter 3. Moreover, development of a future Regional Advance Mitigation Program (RAMP) is a specific suggested action to promote conservation.
0001536.18	We suggest an action-oriented emphasis like “conserve” or “partner to conserve...” as follows: Proposed Modification (N&FL Appendix, Pg. 2) “Conserve natural and agricultural lands and restoration of habitats.”	Comment noted.
0001536.19	Proposed Modification (Plan, Pg. 9) “Conserve natural and agricultural lands and restoration of habitats.”	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001536 Related Documents Link
0001536.20	Further, FHBP just completed a yearlong study of restoration projects and their rate of success or failure. What we found was that most projects struggled to meet the mitigation measure requirements necessary under the California Environmental Quality Act (CEQA). In several instances (Pg. 2 & 11), the Appendix mentions removing non-native plants. Our study shows that this goal was part of the restoration project too, but the non-native seed bank was able to outcompete the native plants and dominate the landscape after the restoration. So, while improving habitats through removal of non-native plants is a commendable goal, it can be difficult for some to achieve without the proper site preparation, funding, experience, long-term stewardship, etc.	Thank you for your comment. We encourage Friends of Harbors, Beaches and Parks to bring attention to its study and other studies like this to appropriate venues at SCAG, such as the Natural & Farm Lands Conservation and Sustainable Communities Working Groups.
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001537 Related Documents Link
0001537.01	Since restoration is a possible focus of this policy, we encourage SCAG to review the information and recommendations from our study. It can be accessed at: https://www.fhbp.org/resources/studies-reports/ceqa-mitigation-study/ .	Thank you for your comment, and for providing the referenced study.
0001537.02	As noted previously under Chapter 2 (the Plan), it is not prudent to rely on cities and counties (1) to protect our natural lands, or (2) to develop plans and policies to conserve them. Specific actions must be taken to ensure the preservation happens in perpetuity—acquisition and ownership by a park/non-profit, a conservation or agricultural easement, or enrollment in a Conservation Plan.	Comment noted.
0001537.03	De-emphasizing growth in wetlands, wildlife corridors, and wildfire prone areas is a great step in identifying areas of regional importance. SCAG should consider supporting local, regional, and statewide efforts already underway in the conservation arena—especially where broad coalitions already exist.	Thank you for your comment. SCAG has and will continue to collaborate with state and local agencies on existing projects. One example is the Regional Conservation Investment Strategies (RCIS) Program, where SCAG has participated on the state level as well as supporting San Bernardino County with developing an RCIS. SCAG is also collaborating with the California Strategic Growth Council on securing resources for Southern California agencies through a Sustainable Agricultural Lands Conservation Program.
0001537.04	Proposed Modification (Plan, Pg. 9) “To further prioritize natural habitat areas and avoid impacts to the environment, Connect SoCal will seek to deemphasize growth in wetlands, wildlife corridors, high-biodiversity areas, wildfire prone areas, and floodplains. Aligning SCAG’s role and support with those of local, regional, and statewide conservation efforts is another opportunity. This approach intends to focus regional growth in existing communities, and reflects various goals of the plan such as adapting to a changing climate and promoting conservation of agriculture and natural lands.” For example, the Coast to Cleveland Connection focuses on connecting the 22,000+ acres of the Laguna Coast to the Santa Ana Mountains. Efforts are underway with the resource agencies, cities, transportation agencies, non-profits, and park managers to make this happen. When these partnerships are available, SCAG should support them.	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001537 Related Documents Link
0001537.05	Another example is the Hillside Open Space and Education Coalition, which, in 2004, united the cities of Brea, La Habra, La Habra Heights, and Whittier and the unincorporated communities of Hacienda Heights and Rowland Heights. The goal was to seek ways to preserve strategic hillside parcels in the Puente-Chino Hills and to mobilize public resources to preserve and acquire the parcels threatened by development. This Coalition is working with State Parks, local cities, residents, and non-profits. Again, this is another opportunity to support an existing effort—if and when the need arises.	Thank you for your comment. We encourage your agency to bring attention to projects like these at appropriate SCAG venues, such as the Natural & Farm Lands Conservation and Sustainable Communities Working Groups.
0001537.06	We were pleased to see the addition of Agrihoods, the Liberty Canyon Wildlife Crossing, and Ventura County Habitat Connectivity and Wildlife Corridor Ordinance in the lineup of new activities being undertaken in the SCAG region.	Thank you for your comment.
0001537.07	For the Orange County Transportation Authority (not Association as listed on Pg. 14 of the N&FL Appendix), it may be helpful to provide context that the funding available in the Environmental Mitigation Program is five percent of the freeway revenues, which in 2005 dollars was \$243.5 million. Proposed Modification (Plan, Pg. 9) “Thirty million dollars for approximately 1,300 acres of land and \$10 million on 350 acres of habitat restoration have been funded through Measure M2. The Measure provides five percent (\$243.5M in 2005 dollars) of the freeway revenues to fund this program.”	Appropriate edits are reflected in the Final Connect SoCal to address this comment.
0001537.08	On Page 16 the first paragraph indicates there are five adopted major conservation plans, but actually demonstrates in the text there are six. This should be corrected as follows: Proposed Modification (N&FL Appendix, Pg. 16) “Currently, there are five six adopted major conservation plans made up of multiple jurisdictions within SCAG’s boundaries (EXHIBIT 5).”	Thank you for your comment. Appropriate edits are reflected in the final Plan to address this comment.
0001537.09	Within the OCTA Measure M2 NCCP/HCP, there have actually been 12 restoration projects funded. The addition of dam removal projects within the Cleveland National Forest were approved by OCTA’s Environmental Oversight Committee in May 2016 and the full OCTA board in February 2017.	Thank you for your comment. Appropriate edits are reflected in the final Plan to address this comment.
0001537.10	Proposed Modification (N&FL Appendix, Pg. 16) “Since the initial funding round in 2010, 1,300 acres of natural lands have been acquired and eleven twelve restoration projects have been funded.” Exhibit 5 fails to include the Southern HCP in Orange County. Since the OCTA Plan overlays the entirety of both the Central-Coastal and Southern Plans, it may be helpful to have the OCTA plan displayed in a patterned texture on top of the other Orange County plans.	Thank you for your comment. Appropriate edits are reflected in the final Plan to address this comment.
0001537.11	We are pleased to see the inclusion of an opportunities section within the Appendix (Pg. 18). However, we’d like to see this section expanded to more than just the Greenhouse Gas Reduction Fund (GGRF) Resources—there are many other tools, strategies, and techniques that can be utilized to conserve natural lands and simultaneously reduce GHG and VMT. Some other funding sources to conserve natural lands are listed in the Environmental Coalition letter to be submitted January 23, 2020.	Comment noted. Additional text has been added to clarify the section : "Although not an exhaustive list of resource opportunities, the following are programs that are often offered through the greenhouse gas reduction fund:"

ID	Comment	Response
<i>Submitted by</i>	Friends of Harbors, Beaches and Parks	Submittal 0001537 Related Documents Link
0001537.12	<p>Additionally, FHBP completed a study of innovative ways to link housing, transportation, and conservation through policies and funding mechanisms. This study is available for download at: https://www.fhbp.org/resources/studies-reports/healthy-communities-toolkit/. The tools mentioned include items such as: • Urban Growth Boundaries • Crowdfunding • Social Impact Bonds • Real Estate Transfer Fees • Community Benefit Fees • Landfill Tipping Fees • Differential Development Fees We recommend extending past the GGRF as the only listed source to support the conservation of natural resources—as there are many others that currently exist at the local, regional, state, and federal level.</p>	Thank you for your suggestion.
0001537.13	<p>We have been a supporter of SCAG and its efforts to include natural land preservation in the RTP/SCS. However, we were disappointed to see that of the 10 policies recommended in the Natural and Farmlands Appendix all 10 policies were replicated word for word from the 2016 Appendix. It is as if no further thought into how the natural world has changed or where the locations of intense development pressure now exist. In the four years since the last plan, new policy recommendations could have been created and incorporated. New policies could be pulled from the list above described in the Opportunities section. We recognize that there may be an internal issue with adding “new” policies in an appendix that aren’t captured in the RTP or SCS itself. One solution to this is to rename the section “Strategies” because what is included in the list are actually implementation strategies for achieving a reduction in GHG and VMT using land conservation and restoration as a tool.</p>	Thank you for your comment.
0001537.14	<p>Of the five “Next Steps” described in the Appendix, three of them were from the 2016 plan. The only creative next step is the development of the regional greenprint, as SCAG is already engaging stakeholders via the Working Group. What we would have expected from the Next Steps section is a forward advancement of the 2016 activities. Our suggestions are below.</p>	Comment noted.
0001537.15	<p>“Encourage Advance Mitigation Programs” could have forward motion by: • Identifying infrastructure agencies about to adopt major programs/policies that could incorporate these advance mitigation programs. • Working to retroactively adopt mitigation programs or policies within existing transportation measures.</p>	The language regarding RAMPs in the “Next Steps” section of the Natural & Farm Lands Conservation Technical Report is intentionally broad to provide flexibility in future RAMP design.
0001537.16	<p>“Align with Funding Opportunities and Pilot Programs” could have forward motion by: • Assisting local agencies with tax increment financing measures that include conservation and parks as a key goal. • Apply for state or federal conservation funding to complete projects of regional and/or statewide significance. • Launch a pilot program that advances sustainable activities like water quality improvements, natural land acquisition, agricultural easement purchases, or restoration project implementation. • Feature conservation funding in a Toolbox Tuesday for how local jurisdictions and/or non-profits can fund local projects.</p>	Thank you for your comment. SCAG will continue to work with stakeholders on addressing these specific suggestions about funding strategies in the next planning cycle.
0001537.17	<p>“Provide Incentives for Jurisdictions to Work Across County Lines” could have forward motion by: • Engaging with cross-jurisdictional conservation alliances to add support, value, and funding to the effort. • Focus SCAG grants on conservation projects of regional significance as a tool for connecting habitat lands together cross-jurisdictionally. • Identify locations where cross-jurisdictional alliances should exist and bring the parties together.</p>	Thank you for your comment. SCAG will continue to work with stakeholders on addressing these specific suggestions about cross-jurisdiction regional planning in the next planning cycle.

ID	Comment	Response
<p><i>Submitted by</i> Friends of the Whittier Hills Association Submittal 0001541 Related Documents Link</p>		
0001541.01	<p>Dear Connect SoCal Team: Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Friends of the Whittier Hills is now a part of this growing coalition in 2020. Citizens created the Friends of Whittier Hills Association in 1984 after the successful Save Our Hills and Save Our Hills Again Referendums. We represent citizens of Whittier, La Habra Heights, Hacienda Height and other neighboring communities that are dedicated to education about the hills and continued protection of the habitat and the bio-diversity of its wildlife. We offer the following comments on the Natural and Farmland policy, goals, and next steps.</p>	<p>Thank you for your comment.</p>
0001541.02	<p>Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long-term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The plan would be stronger if it supported the enhancement and/or protection of documented wildlife corridors prior to commencing impactful projects.</p>	<p>Thank you for your comment. SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included in the final growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Furthermore, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>
0001541.03	<p>Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I can be reached at 626 622-6541. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to jb123kelly@earthlink.net.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of conservation strategies. Your group is encouraged to participate in the effort, and we will send notifications about upcoming opportunities to the provided email address.</p>
<p><i>Submitted by</i> Have A Go Submittal 0001306 Related Documents</p>		
0001306.01	<p>As I was looking over the report I had a few thoughts and recommendations: First, in the executive summary I didn't see traffic as one of the reasons for investing in active transportation. Traffic is often a big motivator for cities and elected officials. Active transportation can move many, many more people per hour per lane compared to automobiles. Because the difference is quite overwhelming, it would provide an additional compelling reason for investing in active transportation. This information regarding traffic mitigation would be helpful to encourage investment in active transportation.</p>	<p>Comment noted. The positive impacts of active transportation on congestion reduction are included throughout the Active Transportation Technical Report, and the executive summary has been edited to include reference to this. Additionally, the impacts of active transportation on traffic/congestion is described in more detail in the Highways and Arterials Technical Report.</p>

ID	Comment	Response
<i>Submitted by</i>	Have A Go	Submittal 0001306 Related Documents
0001306.02	<p>The other thing I noticed was there was a goal of equity on one hand, yet for bicycling infrastructure, there was no mention about how to improve equity, how to increase the balance of ridership to include women, children, seniors, minorities. The different classes of bike lanes were noted in the report. However there was no analysis of the comfort and safety of each kind which makes a big difference between seeing mostly young men in bike lanes vs an equitable mix of riders. And given recent research showing that automobile passing distances of class II bike lanes is actually less than where no lanes exist, classifying painted lanes as bike lanes now seems counterproductive to safety, equity, and overall adoption. Unsafe and uncomfortable class II and III bike lanes pose an additional level of danger in that mapping smartphone apps recommend riders use those paths, causing even more dangerous and inequitable trips. This echoes the standards laid out by Enterprise with 25mph streets and above requiring class IV lanes.</p>	<p>Comment noted. Language has been added to the bikeways classifications discussion in the “Current Bikeway Network” section to address Level of Traffic Stress for each bikeway class as noted in Table 2. Please refer to Table 2 Cyclist Classification – Level of Traffic Stress (LTS) and the “Existing Conditions; Bicycling” section for additional detail on impacts of LTS on different riders. Additionally, strategies to improve access for people of all ages and abilities are outlined in the “Implementation Strategies; Local Bikeway Infrastructure” section where the specific need for complete networks of separated facilities is highlighted.</p>
0001306.03	<p>Micromobility such as shared scooters and bicycles is noted in the plan as modes that help reduce car trips. However if micromobility is to be considered a potential for real citywide usage as true transportation vehicles, the artificial caps placed on providers by cities must be addressed. With millions of automobiles on the road and only about 30,000 micromobility devices allowed due to LA city caps, shared bikes and scooters will always remain a tiny portion of vehicle miles traveled without addressing the goals of climate, equity, etc. As the representative from Alta planning share noted (at the Active Transportation working group meeting), the more people see bikes, the more they’ll use them. It’s stunning to see our millions of 4-6000 vehicles moving at deadly speeds on our roads while on the other hand hearing concerns of safety of a few thousand 15-20 lb vehicles moving at a maximum of 15 mph.</p>	<p>Comment noted. SCAG has begun the early stages of developing a regional framework and guidance for regulation of micromobility devices and services. Individual cities in the region regulate the devices on their streets, consistent with state and federal law. Certainly, automobiles, SUVs and trucks pose a far larger threat to safety on our region's streets than scooters or electric bicycles, and SCAG is eager to continue work with cities, partners and stakeholders in the region to reduce single-occupancy vehicle use and increase the use of safer vehicles.</p>
0001306.04	<p>While city bike sharing is often paid for by cities, presumably due to their civic, climate, and equity benefits, dockless bike and scooter sharing is not only not subsidized but are charged with fees. These fees have partly resulted in the higher prices of micromobility making them often inequitable, the opposite of their original intent of providing easy and affordable mobility. SCAG should recommend, at minimum, removing the per scooter/bike fees from providers. And if we’re serious about active transportation, should view scooters/bikes as vital transportation services and consider subsidizing these vehicles, as LA does for Metro Bike Share.</p>	<p>Comment noted. Please refer to the Emerging Technologies Technical Report for SCAG recommendations for micro-mobility administrative and operational procedures. The Emerging Technology Technical Report recommends that “as county transportation commissions develop MaaS [Mobility as a Service] platforms, they should pursue the option of adding micro-mobility services to the universal fare media.”</p>

ID	Comment	Response
<i>Submitted by</i>	Have A Go	Submittal 0001306 Related Documents
0001306.05	<p>To achieve the desired outcomes of climate goals, equity, safety, and active transportation adoption, the technical report should include in its recommendations section a recommendation of complete protected bike and micromobility networks. A complete network is required to achieve the “transportation” portion of active transportation. Dismembered bike lanes only serve casual, local rides. Transportation requires access to most parts of a city. Highways or roads with significant gaps would not be considered acceptable transportation solutions. Complete a bikes and micromobility network is even more important considering the exposed nature of their riders and our goals of increasing adoption. Think of bike sharing as transit service. A transit service with very, very limited routes is not really a transit service. SCAG should look to what other cities have boosted active transportation adoption. For example London and Paris, both large metropolitan cities that had very low bike ridership have successfully and significantly created active transportation adoption. How did they manage to create such significant shifts to active transportation and how can cities in Southern California learn from them?</p>	<p>Comment noted. The Active Transportation Technical Report does recommend complete networks for both bicycle and pedestrian infrastructure in the “Implementation Strategies” section. Additionally, the strategies for first-last mile to transit infrastructure include “complete station area pedestrian, bicycle and micro-mobility improvements to improve station access and safety.” Throughout the Technical Report, SCAG highlights the utilization of active transportation best practices to inform the plan. These best practices include strategies used successfully in other cities.</p>
<i>Submitted by</i>	Hills for Everyone	Submittal 0001539 Related Documents Link
0001539.01	<p>Hills For Everyone (HFE) is an organization dedicated to the protection of the rare, unique, and disappearing landscapes of the Puente-Chino Hills Wildlife Corridor. We are writing to express our support for the natural and farmland policies included in the Draft Connect SoCal Plan. By way of background, regional efforts to save the Puente-Chino Hills have been underway for more than four decades. Conservationists have been remarkably successful. In the western part of the Corridor, nearly 4,000 acres have been purchased mostly as mitigation lands. In the east, 14,000 acres have been set aside as Chino Hills State Park. The entire hillside system is now connected to the Cleveland National Forest at Coal Canyon under the 91 Freeway. The Corridor spans Los Angeles, Orange, Riverside, and San Bernardino Counties. Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). Since 2012, with release of the prior RTP/SCS, we’ve been part of the regional conservation coalition organized by Friends of Harbors, Beaches and Parks. Our collective goal was the inclusion of natural lands mitigation and policies within that SCAG plan.</p>	<p>SCAG will continue to work with this stakeholder group in order to implement the conservation strategies discussed in Connect SoCal.</p>

ID	Comment	Response
<i>Submitted by</i> Hills for Everyone Submittal 0001539 Related Documents Link		
0001539.02	<p>As it relates to the Plan, we have comments on the following items:Wildlife Corridors HillsFor Everyone partnered with California State Parks and numerous other entities to ensure permanent preservation of Coal Canyon Biological Corridor along the 91 Freeway. Without the Coal Canyon connection at the northern end of the Santa Ana Mountains, the entire Puente- Chino hillside system would have become “an island” and, over time, a steep decline in native species would have occurred due to a limited gene pool and loss of large predators. According to Drs. Reed Noss, Paul Beier, and Bill Shaw:“Restoring a natural linkage in what is now a roaded underpass would set a global precedent. We are aware of no other restored biological corridor of this type and scale. Conservation-minded citizens throughout the world could look to Coal Canyon as an inspiring example of how an ecological error was corrected through thoughtful public action.”This was a monumental effort, but our work is not done. Recent efforts to protect the Pechanga Corridor at the southern end of the Santa Ana Mountains is now at risk. Conservation groups and agencies are partnering to make this connection realized. Without this connection to the south, the top predator, the mountain lion, will become extinct in our area. Additional efforts are underway to protect the sub-species of mountain lion found in these and other local Southern California mountains. This is part of the reason why SCAG’s plan to de-emphasize growth in wildlife corridors (Appendix, Page 4) and policy to improve natural corridor connectivity (Appendix, Page 21) is so important to our region.</p>	Thank you for your comment.
0001539.03	<p>Significant Ecological AreasAdditionally, 3,000 acres of land in the unprotected middle of the Puente-Chino Hills Wildlife Corridor are an important connection needed to preserve the integrity of the 18,000 acres already protected. These 3,000 acres lie at the juncture of Orange and Los Angeles Counties. As noted in the draft Plan (Appendix, Page 14) Significant Ecological Areas (SEA) are a recently updated conservation strategy and policy in the region. Based on the Los Angeles County Board of Supervisors Resolution (from December 17, 2019), Conceptual SEAs have been eliminated as a category. As of January 16, 2020 (30 days after the ordinance was passed) the resolution is in full effect. This means all Conceptual SEAs are now simply considered adopted SEAs. See Item 3 under the Board of Supervisors Resolution from December 2019 (Attachment 1).Further because the resolution is now implemented, Exhibit 4 on Page 15 of the Appendix is inaccurate. The two Conceptual SEAs are now SEAs and should be displayed as such.</p>	Thank you for your comment. Appropriate edits have been made to reflect this comment.
0001539.04	Thank you for the opportunity to comment on this Plan.	Thank you for your comments.
<i>Submitted by</i> Imperial County Transportation Commission Submittal 0001338 Related Documents		
0001338.01	<p>Just appreciative of all the work that SCAG staff has done to help us meet our air quality conformity requirements and our revenue-constrained elements of our projects in the plan. And we -- you know, we're a small -- one of your smallest populations. But, you know, we certainly agree with all the guiding principles and goals of the plan even for us in Imperial. So thank you for all the effort.</p>	Comments noted and acknowledgements appreciated.

ID	Comment	Response
<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.01	<p>Thank you for the opportunity to provide comments on the Draft 2020 RTP/SCS, or Connect SoCal (Draft Plan). Leadership Counsel has worked in the Eastern Coachella Valley (ECV) for over six years, advocating at the local, regional, state, and federal levels on the overlapping issues of land use, transportation, climate change, safe and affordable drinking water, affordable housing, government accountability, and equitable investment in disadvantaged communities. We seek to advance environmental justice in some of the most vulnerable communities in California and we do so in partnership with frontline communities and community residents.</p>	Thank you for your comments.
0001544.02	<p>Southern California is home to a diverse geographic landscape with a population just as diverse. It's a region with immense opportunity and unique challenges. Planning, therefore, is an integral tool to ensuring a just and thriving region for all people. Through our comments, we seek to strengthen Connect SoCal's policies to create sustainable, equitable, and effective transportation that directly benefit all of SCAG's residents, regardless of race, socioeconomic status, language, or place. At the forefront of such a plan, SCAG must acknowledge the distinct issues faced in different parts of the region and assess the specific solutions needed to solve them. In our letter, we hope to provide such insight on rural, agricultural, and unincorporated communities that most face hardship with transportation, housing, and the impacts of climate change. This letter also provides specific insight on the particular issues faced in the Eastern Coachella Valley (ECV) in Riverside County. Our comments to the Draft are informed and motivated by our work directly with low-income communities and communities of color in the ECV. Leadership Counsel works to ensure that the ECV receives the benefits of equitable investment and healthy development in order to enjoy healthy and safe places to live. Our direct partnership with community residents helps inform our approach with regional transportation planning. We have thus worked to elevate the prominent issues in the ECV with respect to mobility, safety, connectivity, access, and overall infrastructure deficiencies that can be seen throughout different unincorporated, rural, agricultural, and low-income communities and communities of color. We commend the staff for their continued engagement and efforts to connect with community-based and non-profit organizations, particularly in disadvantaged communities. We look forward to continued collaboration with staff and partners to ensure that Connect SoCal includes a comprehensive and equitable set of policies to address transportation, sustainability, and housing across the region.</p>	Thank you for your comments. SCAG also looks forward to our continued collaboration. Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.03	<p>Community Outreach and Engagement Strategy recommendations: a.Include stronger practices for meaningful community outreach and engagement. We appreciate the level of engagement that staff conducted with community-based and nonprofit organizations working with environmental justice communities. These efforts should continue and can be improved upon with more direct partnerships. Organizations working on the ground are capable of having much more capacity by working together, especially if they work within the same region. Helping organizations build capacity and cross-sector collaborations can help advance the work much further. SCAG can help advance this by working with organizations and encouraging partnered outreach efforts to better reach community residents. This has worked with us in the ECV and we’ve been able to build our relationships with partners and align our efforts between organizations for one united cause. Overall, SCAG is encouraged to rely on the support and guidance of community-based and non-profit organizations, but should still employ their responsibility as the region’s Metropolitan Planning Organization to lead an effective and meaningful community engagement process. This includes conducting public community workshops and meetings that provide background information, full context, public comment and design opportunities, as well as follow-up opportunities with residents to maintain engagement throughout the entirety of the planning process. In addition, these policies and practices should be outlined in the Draft for jurisdictions and planners to follow as they work to implement the vision of Connect SoCal through a community driven process.</p>	<p>Comment noted. In this RTP/SCS plan cycle, SCAG worked with 18 community-based organizations (CBOs) across the region, to engage populations that have traditionally been underrepresented in formal planning. The CBOs engaged the public at approximately 30 events in early summer. This collaborative outreach strategy is aligned with SCAG’s “Bottom-Up Local Input and Envisioning Process” for Connect SoCal, fulfilling the goal of engaging a “broad range of stakeholder groups” to “evaluate potential region-wide integrated land use and transportation planning strategies.” As a result, SCAG developed a Public Engagement guide to provide a model and recommendations for further engagement of CBOs and underrepresented populations for future RTP/SCS cycles. Concurrently, SCAG held a series of 28 open house-style workshops, a telephone town hall and a survey offered in 17 languages to gather input from the public. These efforts resulted in the collection of more than 12,000 unique comments and more than 4,000 survey completions. Stakeholders were communicated with via email up to and following release of the draft RTP/SCS. During this plan review phase—SCAG held three public hearings, 21 public briefings, a telephone town hall and a webinar to communicate the components of the plan.</p>

ID	Comment	Response
<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.04	<p>a. Reinforce the importance of inter-agency and cross-sector collaboration to better facilitate project development, funding, implementation, and operations and maintenance. To better support the community and Connect SoCal’s vision, there needs to be stronger collaboration and overall communication practices between the different agencies responsible for executing projects. It is equally important to integrate these efforts within the community engagement process to ensure that residents are a part of the conversation every step of the way.</p>	<p>SCAG recognizes the importance between inter-agency and cross sector collaboration in its six-county region in order to facilitate the best practices for regional planning. SCAG meets regularly with our County Transportation Commissions (CTCs), Caltrans, local transit agencies, and other partner agencies throughout the development of Connect SoCal. SCAG held monthly presentations to our Technical Working Group (TWG), which is comprised of SCAG's partner agencies to provide critical feedback and vet technical matters as they relate to SCAG’s development of its regional plans and other planning studies. This group acts as an advisory committee to the Connect SoCal, facilitating important discussion between the partner agencies. The feedback discussed in these meetings is verified and incorporated into various stages of the development of Connect SoCal which then goes through a public review process in the form of workshops and public hearings, communicating results to the general public. In accordance with state law, AB 1246, SCAG is also required to meet with representatives from the commissions and Caltrans to review the major components of Connect SoCal.</p> <p>Additionally, SCAG also has formed seven Regional Planning Working Groups including, Active Transportation, Environmental Justice, Mobility Innovations, Natural and Farms Lands Conservation, Public Health, Transportation Safety, and Sustainable Communities. SCAG uses these Working Groups to communicate with broader cross sector groups that may not be included in the normal planning process throughout the region.</p> <p>SCAG also interacts with member cities, counties, business leaders, organized labor, environmental groups, and other key stakeholders through its Global Land Use and Economic Council (GLUE). The GLUE Council advises SCAG staff on the economic implications of SCAG’s planning activities and further engages key public and private stakeholders. These technical working groups each met multiple times throughout the development of the Draft Connect SoCal. Descriptions and the dates of each of their meetings are located in the Public Participation Technical Appendix. SCAG continue to asses and improve on stronger collaboration and overall communication practices to our stakeholders and the general public.</p>
0001544.05	<p>Environmental Justice and Public Health We appreciate that environmental justice is being increasingly acknowledged by SCAG in this years update as playing a vital role in all sectors of planning, as has long been advocated by environmental justice communities and organizations. We are glad to see that an environmental justice toolkit has been developed and included in the Draft and that it draws from additional resources like the California Environmental Justice Alliance SB 1000 toolkit which was developed with the expertise of several environmental justice leaders from across the state.</p>	<p>Thank you for your comment.</p>

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<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.06	<p>Strategy recommendations: a. Ensure a better understanding and inclusion of the serious needs and deficiencies of rural and unincorporated communities in the Draft. Rural communities provide a unique landscape for planning and development. Given SCAG’s vast geography and growing needs in more densely populated areas, rural communities and subregions tend to see less investment and prioritization. Nonetheless, such communities, like those located more inland, play an important role in the character and economy of SCAG and the State of California. It is incredibly important to understand the unique challenges faced in rural communities, especially ones in unincorporated and environmental justice areas. As such, unique solutions are necessary to ensure that communities are not being left behind, ignored, or further burdened by the growing need for transit, housing, and impacts of climate change. Connect SoCal should independently discuss rural, unincorporated, and agriculturally rich communities and how this plan will help advance their specific community priorities through 2045.</p>	<p>Comment noted. SCAG acknowledges that different communities, like rural communities, face different Environmental Justice (EJ)-related issues throughout the region and will continue to work with stakeholders through the EJ Working Group to ensure your comments and concerns are addressed in future plans and analyses.</p>
0001544.07	<p>b. Directly address urban greening deficiencies in environmental justice communities and transit access to parks and green spaces. As stated in the Environmental Justice Technical Report, “not all parks are created equal, however, and many neighborhoods do not have access to a variety of public resources” (pg. 73). This is particularly true for rural communities. Green spaces in the ECV are almost nonexistent and any new park projects that are planned and developed, they’re done so with a minimal capacity for carbon sequestration. SCAG should outline a strategy to incentivize jurisdictions to prioritize green space development and access to parks that have significant carbon sequestration potential and minimal impacts to the region’s water supply.</p>	<p>Thank you for the comment. The Environmental Justice (EJ) Technical Report has included analysis about the accessibility to local parks and regional open spaces in the region by different ethnicity and household income level groups for both automobiles and transit. The analysis has thoroughly analyzed the level of accessibility for each mentioned socioeconomic group in EJ communities to assess potential disproportionate impacts from the implementation of Connect SoCal. In addition, the EJ Tool Box also provides an extensive list of recommended practices and approaches to maximize park accessibility. SCAG will continue to work with EJ stakeholders through the EJ Working Group to include additional recommendations like strategies to incentivize local jurisdictions to prioritize green space access. The Connect SoCal main book and Natural and Farm Lands Technical Report also provide goals and strategies related to park accessibility.</p>
0001544.08	<p>Climate Change and Air Quality Strategy recommendations: a. Incorporate a “Just Transition” strategy to ensure compliance with the statewide efforts of reducing greenhouse gas emissions. A Just Transition framework is an approach to shifting from an extractive and polluting economy to a more equitable, sustainable, and renewable one. This emphasizes the process of electrification while eliminating the reliance of traditional fossil fuels, including petroleum, natural gas, and coal. While certain fuels may be known to produce less GHGs, their reliance and usage, however, still contribute to climate change and the very issues that Connect SoCal is created to solve. Policies and strategies that contribute to such a vision can better meet the goals of a Sustainable Communities Strategy and take the vision of Connect SoCal a step further than just meeting the State’s requirements.</p>	<p>Comment noted. Please see the "Accelerated Electrification" strategy in Chapter 3, which offers a holistic and coordinated approach to de-carbonizing or electrifying passenger vehicles, transit and goods movement vehicles. Through greater coordination and deeper collaboration, this strategy aims to go beyond benefits achieved through state mandates alone.</p>

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<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.09	<p>b.Support air quality mitigation strategies to protect public health in addition to emission reduction efforts. As noted in the Draft Plan and Technical Reports, the SCAG region is designated as a federal non-attainment area, meaning that it fails to meet National Ambient Air Quality Standards (NAAQS) for criteria air pollutants that are harmful to human health. Areas like the Coachella Valley have also received this designation, not only because of its own local stationary and mobile sources of emissions, but also because of the high levels of emissions travelling to the area from the South Coast Air Basin. Through our advocacy with South Coast AQMD and the Community Air Protection Program (AB 617) we've been told that reducing emissions at the source is the only priority and way to reach attainment. Connect SoCal should acknowledge that such emissions are coming from a wide range of sources and there should be a mitigation strategy in place to assist communities that are also being impacted, even if the emissions are not being locally produced.</p>	<p>Comment noted. SCAG will consider your recommendation wherever applicable.</p>
0001544.10	<p>c.Incorporate effective preventative and response measures to unauthorized dumping and fires in EJ, unincorporated, and Tribal communities. Illegal dumping and burning is a common practice in desert, unincorporated, and Tribal lands. This has led to the spread of mulch fires and other types in the ECV. Fires and poor air quality greatly impact the residents in this region, especially because they don't have the necessary measures to protect them from harmful air. Mobile homes are poorly weatherized, farmworkers receive no protection, and children and seniors are seriously affected. From recent events, residents have asked for a stronger community engagement and communications plan, a stronger protocol for responding to such hazards, and for more government accountability and preventative measures to both the illegal dumping and burning, and other environmental hazards that happen in the community, including tribal land.</p>	<p>Thank you for your comment. SCAG staff will consider the issue of unauthorized dumping and fires in the SCAG region, especially Environmental Justice communities, unincorporated, and Tribal communities and work with appropriate stakeholders to help address these concerns in the future.</p>
0001544.11	<p>Active Transportation and Public Transit Active transportation and public transit infrastructure is highly important for residents to better navigate their communities, improve their health and safety, and to more effectively reduce their contributions to greenhouse gas emissions.</p>	<p>Thank you for your comment. SCAG supports active transportation and public transit infrastructure development and encourages development of robust first-last mile infrastructure to help people better access transit stations.</p>
0001544.12	<p>Strategy recommendations: a.Provide stronger solutions and policies for improving transit, mobility, and infrastructure in underdeveloped regions. Communities like the Eastern Coachella Valley have greatly lack the necessary infrastructure for residents to travel within the area in a safe and easy way. Effective transit, mobility, and other supporting infrastructure is nearly nonexistent in the majority of the region and residents' quality of life and health are greatly impacted.</p>	<p>Thank you for your comment. Connect SoCal supports increasing connectivity, access, frequency and greater service hours with public transit in the SCAG region including the Coachella Valley. SCAG worked with the Riverside County Transportation Commission and SunLine Transit Agency to identify transit improvements within available funding constraints.</p>

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<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.13	<p>b.Prioritize funding projects that most benefit DACs and DUCs. Projects that help increase access to active transportation infrastructure and public transit heavily rely on population density and other urban characteristics of a community to receive grant funding. Some of these projects, as a result, don't benefit the most vulnerable communities. CV Link is an example of how communities in the ECV are always the last to receive investment and infrastructure. Connect SoCal should do better by elevating true community-led and driven efforts on mobility justice. The current projects that are listed for the ECV region do not include any significant investments for active transportation or other mobility projects that have been identified by community residents. Please refer to the ECV Regional and Neighborhood Mobility Plans that we have been developing with residents for over two years.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.</p>
0001544.14	<p>c.Support appropriate mobility options that best fit the community. Mobility in rural areas looks much different than urban areas. Therefore, Connect SoCal should better support diverse, environmentally friendly mobility options that are appropriate to the community. This includes more zero-emission cars, e-scooters and e-bikes, micro-transit, and all the supporting infrastructure needed to support these alternatives. Such infrastructure should also make sure to address and mitigate the impacts of any extreme weather conditions experienced in a community.</p>	<p>Thanks for your comment. We agree that mobility options will look different in every community. We look forward to working with rural areas on finding the best combination of policies and programs to sustainably move people where they need to go.</p>
0001544.15	<p>d.Align your transportation expenditures to meet the needs of low-wage workers and inclusion of public transit and active mobility projects. Although SCAG acknowledges that low-wage workers who experience longer distance commutes, especially in the inland region, the investments outlined in your financing and expenditure plans are not reflective of the need to improve public transit and alternate modes of transportation. Rather, SCAG prioritizes highway expansions and undermines the potential for disadvantaged communities to receive stronger mobility investments. SCAG should make a better effort at ensuring that investments are directed towards more mobility projects, especially in transit deficient and disadvantaged communities, that are frequent, reliable, reduce emissions and people's reliance on personal occupancy vehicles. Such investments should prioritize zero-emission transit and supporting infrastructure projects.</p>	<p>Comment noted. Connect SoCal is the result of a bottom-up local input process. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency.</p>
0001544.16	<p>e.SCAG should implement the strategies above to frontload these projects and prioritize these investments in the early stages of implementing Connect SoCal. With this strategy, Connect SoCall will be able to better meet it's GHG reduction goals as well as other climate targets faster. It will also support more equitable planning and land use practices that are drastically needed in rural and underdeveloped communities.</p>	<p>Comment noted. SCAG worked closely with the six county transportation commissions to identify and prioritize the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to modify project priorities would need to undergo a similar coordinated process involving the affected county transportation commission and lead agencies. Therefore, as a practical matter, substantive changes to project priorities could only be considered in the next update cycle.</p>

ID	Comment	Response
<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.17	<p>Land-UseStrategy recommendations: a.Enhance the inclusivity of rural communities in your TOD and HQTa framework. Similar to the first strategy recommendation under Environmental Justice, a specialized analysis of rural needs and conditions should be developed to better prioritize investments in rural communities and develop specific policies and strategies tailored to such communities. Connect SoCal should identify ways in which to address this. Chapter 3 emphasizes that “priority must be placed...on urban and suburban infill” (pg. 50, Connect SoCal). Areas that are identified for Transit Oriented Development and as High Quality Transit Areas, while beneficial to development in urban regions, still further perpetuates the lack of investment in rural communities that don’t already have good transit infrastructure. The current framework is set to continue the disenfranchisement and underdevelopment of communities across SCAG because of their given landscape and geography. One avenue includes strengthening the Neighborhood Planning Areas to be more inclusive and adaptable to the ECV communities while also adopting policies and actions to support the expected housing and job growth. This analysis, especially for your Neighborhood Planning Areas, should be matched with the appropriate investments for implementation.</p>	<p>Comment noted. While the transit oriented development (TOD) and high quality transit area (HQTa) frameworks do lend themselves more readily to urban and suburban applications, many of the similar principles can be applied to development in rural areas. In addition, rural communities are included in one of Connect SoCal's other priority growth areas, Job Centers.</p>
0001544.18	<p>b.Integrate stronger Connect SoCal should better outline anti-displacement policies and ordinances that can help prevent the negative outcomes of gentrification. Although the Draft acknowledges the possibility of gentrification with infill development, it doesn’t, however, outline practices or policies for jurisdictions to follow that clearly state how and why planners should more effectively prevent the process of gentrification.</p>	<p>Comment noted. The Environmental Justice (EJ) Toolbox includes recommended practices and approaches that can potentially be used to combat gentrification and displacement. However, because the EJ Toolbox is meant to be a dynamic document, SCAG staff will continue to work with our EJ stakeholders to further improve the toolbox with relevant best practices and recommended approaches so that it can be a resource to local jurisdictions and EJ stakeholders.Also see the Sustainable Communities Strategy Technical Appendix.</p>
0001544.19	<p>c. Emphasize the protection of natural lands to deter unwanted and unnecessary luxury development that does not address the housing crisis in California or other EJ priorities. Under the Natural Lands section of the Draft Plan presents the fact that such lands exist only in “remote desert areas far from incorporated areas” therefore reducing the concern of natural lands for urban areas (pg. 32). This type of language is another example of how disregarded rural areas are in such significant plans. Given the significance of natural lands in the desert region, the Draft Plan should also develop an analysis of existing habitat and conservation plans and more effectively promote policies that help deter unwanted luxury development that don’t serve nearby environmental justice communities. Farmlands in the ECV are extremely vulnerable to rezoning in order to allow more development into the area, but these changes have never been for the purpose of increasing affordable housing development, but rather exclusive and luxury developments for more affluent communities.</p>	<p>Thank you for your comment. The Natural & Farm Lands Technical Report considers conservation policies and plans throughout the SCAG region, including desert areas. Moreover, Connect SoCal's regional Sustainable Community Strategy seeks to promote diverse housing choices by preserving and rehabilitating affordable housing and preventing displacement, and by identifying opportunities for new workforce and affordable housing development. Also see the Final Sustainable Communities Strategy Technical Report.</p>

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<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001544 Related Documents Link
0001544.20	<p>d.SCAG should be more inclusive of indigenous and Native American communities and the role they play in land-use planning and decision-making processes. Increasing inclusivity will all members of a region is highly important, especially with the various Tribes in the SCAG's geography. First and foremost, Tribal sovereignty and autonomy should be fully respected, but SCAG should also identify ways in which it is engaging with Tribal communities. The ECV, for example, is home to the Torres Martinez Desert Cahuilla Indians who are extremely engaged in different community efforts to advance environmental justice. SCAG should identify a protocol for how to engage with support indigenous communities in environmental justice communities.</p>	<p>Comment noted. Connect SoCal - the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, CTCs, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. In order to inform and collect input from local jurisdictions, SCAG has conducted the Local Input Process starting in 2017 and ending in 2018; tribal governments were among the contacted stakeholders and informed about the process. SCAG also conducted numerous Environmental Justice Working Group meetings and targeted outreach to provide information and engage stakeholders like tribal governments. SCAG will continue to value inclusivity and informational transparency.</p>
<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001545 Related Documents Link
0001545.01	<p>Goods Movement Strategy recommendations: a. Better highlight the impacts that the goods movement industry has on environmental justice communities and include mitigation measures. While the goods movement does provide some economic benefits to workers in the industry, the Draft Plan's tone, specifically in the Goods Movement Technical Report, on this topic minimizes the public health impacts that it has on people and the environment at every point of the freight transportation system. Although we commend the Draft Plan's path to electrification of the industry, there are still land-use and planning practices that facilitate goods movement and the siting of warehouses that consequently harm and impact people's health. The Draft should clearly prioritize public health over profit and economic development, but also propose creative solutions for residents to be able to have clean air and clean jobs. Stronger and more thorough mitigation and adaptation policies should also be developed to address the existing on ongoing impacts of the freight and logistics industry until a fully electric system has been implemented.</p>	<p>SCAG strongly agrees that mitigation of freight impacts, especially for environmental justice communities, is a critical. Included in the section titled Goods Movement Environmental Strategy and Technology Advancement Plan, SCAG identifies a phased strategy to address the negative impacts of freight. For more information on SCAG's strategies regarding environmental justice communities, please see the Final Environmental Justice Technical Report. Also, please note that SCAG is currently undertaking efforts to develop an environmental justice toolbox for disadvantaged communities disproportionately affected by goods movement, and will more thoroughly explore environmental justice concerns through its updated Comprehensive Regional Goods Movement Strategy and Implementation Plan.</p>
0001545.02	<p>b. Create a precedent for good land-use policies and practices. Warehouses can be primarily found in low-income communities and communities of color that face a number of other EJ issues. The placement of warehouses in their communities demonstrates a long history of environmental racism and although this industry helps strengthen the region's economy, it has in fact been a major contributor to the declining air quality in the region, and one of the responsible entities for the growing percentage in respiratory illnesses in neighboring communities. An example to follow would be the General Plan Guidelines for Economic Development created by the Office of Planning and Research. The Economic Development chapter includes good language on how to ensure that economic development aligns with the objectives of creating healthy communities.</p>	<p>Comment noted. The California Air Resources Board will be developing a series of freight handbooks to assist local jurisdictions in guiding the development of freight facilities and empower environmental justice groups to participate in the decision making. The first module of the freight handbook will be focused on warehouses and will likely be released in 2020. Please refer to the Related Regulatory Initiatives section of the Goods Movement Technical Report for more information.</p>

ID	Comment	Response
<i>Submitted by</i>	Leadership Counsel for Justice and Accountability	Submittal 0001545 Related Documents Link
0001545.03	<p>Funding and Resources: Strategy recommendations: a. Create a technical assistance guide that captures all available funding programs to assist jurisdictions in the application process. Jurisdictions are often hesitant or reluctant to applying for planning or infrastructure implementation grants for disadvantaged and environmental justice communities. This often attests to the lack of capacity, limited political will, or the belief that a project, especially in a rural community, would never be competitive enough to be awarded. Connect SoCal can help change this narrative by creating a detailed technical assistance guide to all available funding programs -- including local, regional, state, and federal -- for jurisdictions to better identify opportunities for their region and implement Connect SoCal policies. This can create a simplified pathway for jurisdictions to better follow Connect SoCal's vision.</p>	<p>Comment noted. SCAG will take your comments into consideration.</p>
0001545.04	<p>b. Utilize additional tools and resources to more equitably identify and assist environmental justice (EJ) communities. The ECV is a unique region that is not well represented due to a lack of data and a population that is considered "hard to count" and therefore poorly represented on data tools like CalEnviroScreen 3.0. Communities should be able to provide supporting documentation like studies, reports, community science data, and other resources that will help elevate the EJ issues in their communities to better capture the impacts they face.</p>	<p>Comment noted. Your comments will be considered for improvements to future Environmental Justice technical analysis and regional transportation plans.</p>
0001545.05	<p>c. Provide guidance on how jurisdictions can better plan and address operations and maintenance costs for projects. One of the reasons jurisdictions often don't push for projects is because they are concerned about the high costs of operations and maintenance a project would incur. Similar to the first recommendation under this section, a resource or technical assistance guide should be developed to identify opportunities that jurisdictions can leverage to better address the high costs of operations and maintenance.</p>	<p>Operations and maintenance costs are important items to consider in project budgets. SCAG will consider these suggestions for the future.</p>
0001545.06	<p>Again, we thank you for the opportunity to comment on the Draft Connect SoCal 2020 Plan (RTP/SCS), for the continued partnership with SCAG, and for Staff's receptiveness to previous comments and recommendations we've made throughout the development of the Draft Plan. We look forward to working with you all on the inclusion of these recommended policies and strategies and their implementation.</p>	<p>Thank you for your comments. Comments noted.</p>

ID	Comment	Response
<p><i>Submitted by</i> Los Angeles County Bicycle Coalition Submittal 0001310 Related Documents</p>		
0001310.01	<p>Since increasing transit and active transportation mode share helps to achieve several of the goals and performance outcomes in the Plan, language should be inserted throughout that planners and transportation engineers should for all projects explicitly assess opportunities for promoting those transportation modes. Currently such considerations are too often lacking entirely or added as an afterthought.</p>	<p>The Implementation Strategies section of the Active Transportation Technical Report outlines strategies and actions that SCAG will undertake to encourage the implementation of Complete Streets throughout the region. SCAG does not have the authority to place requirements on every funded project. However, we are committed to working with local, state and federal partners in implementing the Active Transportation component of Connect SoCal with a focus on Complete Streets. SCAG supports an approach that would make complete streets treatments a default unless deemed truly impractical. Additionally, SCAG supports and champions a robust and meaningful approach to public engagement through the Go Human campaign as well as through requirements in SCAG-funded programs. Language has been added to both the Technical Report and the main book of Final Connect SoCal to make clear SCAG's recommendation that Complete Streets be implemented on all non-limited-access streets in the region.</p>
<p><i>Submitted by</i> Los Angeles County Business Federation Submittal 0001524 Related Documents Link</p>		
0001524.01	<p>On behalf of BizFed, a grassroots alliance of more than 190 business organizations representing 400,000 employers with over 3.5 million employees in Los Angeles County, we want to thank SCAG for the great work in presenting this plan to many diverse stakeholders in Southern California.</p>	<p>Thank you for your comment. Comment noted.</p>
0001524.02.1	<p>We see great things in the plan that we strongly support, such as increasing housing production, leveraging investments from enhanced infrastructure financing districts (EIFD), supporting 5G Smart Cities, and supporting increased public transit and Metrolink service. However, we heed caution to the calls for imposing vehicle miles travelled (VMT) reduction targets and the fees attached to them as a strategy for greenhouse gas (GHG) reduction. This strategy and its fees have negative impacts on disadvantaged communities. We view this as counterproductive to BizFed's anti-poverty goal of lifting one million persons in Los Angeles County out of poverty over this decade.</p>	<p>Thank you for your comment. Your comments will be considered for areas of improvement in future Environmental Justice analyses and regional transportation plans.</p>
0001524.02.2	<p>California ranks at the top in the United States for poverty and homelessness – both of which are attributable directly to the housing supply shortage, high housing prices that are nearly three times above the national average, and longer commutes where working families are “driving until they qualify” for housing that they can rent or buy.</p>	<p>Connect SoCal prioritizes future growth in job centers, high quality transit areas (HQTAs), neighborhood mobility areas and livable corridors with transportation options. Regional initiatives focused on supportive infrastructure for housing in these areas seek to incentivize infill housing production. In addition, recent legislation (e.g., AB 101 and SB 2) has increased funding to support local planning to accelerate housing production to implement the 6th Cycle RHNA allocation which is supportive of Connect SoCal goals, strategies and policies.</p>
0001524.03.1	<p>The call for user based vehicle mileage travel fees - in Chapter 5 of the Environmental Justice section of the plan - will hurt the very people who are most disadvantaged. These workers are paying more as they travel farther to work at a good paying job and afford a place to live, thereby spending more of their income on basic necessities such as transportation and shelter.</p>	<p>Comment noted. The mileage-based user fee approach does impact low income populations but as suggested in the analysis results, the mileage-based user fee is less "regressive" as compared to the traditional gasoline tax because it allows lower income households to pay the same price per mile as other groups. In addition, it also removes the advantages that middle and higher income households have due to their access to relatively new and more fuel efficient vehicles and promotes more equity in the funding of the region's transportation system.</p>

ID	Comment	Response
<p><i>Submitted by</i> Los Angeles County Business Federation Submittal 0001524 Related Documents Link</p>		
0001524.03.2	<p>BizFed recognizes the call for increased public transit service and multi-family transit-oriented housing production as a strategy to mitigate those concerns. We believe the implementation of these goals will be hampered by CEQA lawsuit abuses. Since 2013, over 70% of these CEQA lawsuits are targeted at stopping infill, multi-family, and transit-oriented housing. According to CARB, these are housing types are needed to invest and support our environmental goals.</p>	<p>Comment noted.</p>
0001524.04	<p>In 2012 and 2016, SCAG's two prior RTP/SCS met the required GHG reduction targets. The RTP/SCS were the result of local input on land use planning, full respect for voter-approved funded transportation infrastructure projects as required by longstanding laws for efficient transportation and goods movement solutions. These voter approved transportation projects are mostly funded from sales taxes which can be volatile to outside triggers such as the recession of 2008-10, resulting in a decrease of sales tax receipts. If these assumptions on VMT reductions, in the RTP/SCS, are to be delivered, we may see dramatic reductions in goods movement infrastructure and sales tax receipts, which are critical to the state's economy. The last time a significant reduction in VMTs occurred was during the recession of 2008-2010. However, with the current trends in e-commerce as well as alternative transportation mobility options such as Uber and Lyft, we have seen VMT's increase.</p>	<p>Comment noted. Connect SoCal's goals include encouraging regional economic prosperity and global competitiveness; and improving mobility, accessibility, reliability, and travel safety for people and goods. The greenhouse gas (GHG) reductions achieved in Connect SoCal are not dependent on a reduction in goods movement infrastructure or a decline in economic growth. See the GHG Reduction Approach section of the Sustainable Communities Strategy Technical Report for more information on how the Southern California region is meeting the GHG reduction target.</p>
0001524.05	<p>BizFed believes there is an opportunity to include in this plan strategies that will help deliver our housing and mobility goals. We want to partner with SCAG in making these goals a reality. We believe that policy tools such as; the return of community redevelopment agencies, leveraging tax increment financing to invest in affordable housing projects, and CEQA reforms against lawsuit abuses for transportation infrastructure projects and housing developments of all kinds both urban and rural, are essential to the conversation that will successfully implement this bold, economically and environmentally sustainable vision SCAG has laid out in the plan. We appreciate SCAG's steadfast efforts to assure that SB 375 can be implemented, complying with its statutory protections for a healthy economy and growing population. BizFed will help SCAG with the above solutions to truly connect all Southern Californians.</p>	<p>Thank you for your comment and support. An important element of Connect SoCal is the Housing Supportive Infrastructure Key Connection, which will expand SCAG's activities to support local agencies in establishing self-help tax-increment financing districts - with the goal of reducing the cost for housing construction to make it quicker for local jurisdictions to produce critically-needed housing. The costs of building parking, and sewer/water infrastructure through Development Fees can range from 10% to nearly 25% of construction costs. By implementing tax-increment finance districts, jurisdictions can plan and implement housing supportive infrastructure. With the increase in use of ridesourcing, right-sizing parking strategies, enabled by technology, can reduce the overall cost of housing construction in Connect SoCal's Priority Growth Areas.</p>
<p><i>Submitted by</i> Los Angeles County Metropolitan Transportation Authority Submittal 0001311 Related Documents Link</p>		
0001311.01	<p>Please see attached spreadsheets for project change submittals. All changes are in red, and for Highway projects, please refer to the RTP comments on the far right column. There are some Strategic Unfunded project changes in separate tabs of the spreadsheet.</p>	<p>Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.</p>
0001311.02	<p>Also, the attached PDF is a page from SCAG's Connect SoCal doc for Transit Capital Projects. Could you please verify who the project sponsors are for the two projects in question: • Red Line Extension to Hollywood Burbank Airport • Los Angeles Slauson Light Rail – Crenshaw/LAX Transit Corridor to Blue Line These are not Metro funded projects.</p>	<p>Thank you for your comment. The Slauson Light Rail and Red Line extension to Hollywood Burbank airport are regional initiatives and assumed to be funded by innovative sources identified in the Connect SoCal financial plan, and not through Metro's traditional funding sources.</p>

ID	Comment	Response
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001312 Related Documents Link
0001312.01	As mentioned, the following is the revision needed for RTP ID 7120010 project description:“Phase A would include construction of the full viaduct structure over the US-101 freeway that accommodates up to nine (9) new run-through tracks with two (2) run-through tracks in the interim, track, signal and communication work in the throat area, run through platform, quiet zone ready improvements at Main Street grade crossing and active transportation improvements.”	Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. RTP ID7120010 has been updated accordingly.
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001344 Related Documents Link
0001344.01	Could you please include the project described below [in attachment] to be included in the Unfunded Strategic list in the RTP?	Comment noted. The unfunded strategic project has been included in Table 3 of the Project List Technical Report.
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001347 Related Documents Link
0001347.01	The RTP IDs listed below are for program amounts designated to subregions (1162S013 – San Gabriel Valley COG, 1162S014 – Las Virgenes Malibu COG and 1162S016 – South Bay COG). Each subregion goes through individual procedures that either; have allocated or will allocate funds from the program amounts to individual projects and their respective city.Hence our recommendation is that Metro not be listed as the lead, but that COGs/various cities be identified as lead.	Comment noted. The requested changes to lead agencies for projects 1162S013, 1162S014 and 1162S016 have been made in the Project List Technical Report.
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001450 Related Documents Link
0001450.01	The Los Angeles Metropolitan Transportation Authority (Metro) appreciates the opportunity to review and comment on the draft Connect SoCal plan. The Connect SoCal plan aligns closely with many Metro plans and policies, including Metro' s Vision 2028 Plan and 2020 Long Range Transportation Plan (LRTP). Collectively, our plans share many of the stated goals of Connect SoCal to improve mobility, accessibility, safety and resiliency of our transportation system while reducing greenhouse gas emissions (GHG) and supporting healthy equitable communities. As the largest provider of public transportation in the Southern California Association of Governments (SCAG) region, Metro recognizes the critical role we play as a partner in achieving the ambitious GHG and vehicle miles travelled (VMT) reduction targets identified in the Connect SoCal plan. Metro is fully committed to supporting SCAG in reaching these targets through the investment and deployment of mobility solutions.	Thank you for your comments. Comments noted. SCAG appreciates Metro's support and commitment towards achieving the region's greenhouse gas emissions reduction targets.

ID	Comment	Response
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001450 Related Documents Link
0001450.02	<p>Cities, through their public engagement processes, land use authority and management of their street network, similarly will be critical to achieving the targets set in the Connect SoCal plan. To this end, Metro recommends that SCAG consider a more robust plan to support cities with SB 743 implementation. As you are aware July 1, 2020 is the statewide implementation date for public agencies to adopt VMT as a metric for identifying and mitigating transportation impacts within CEQA. To date, very few cities in Los Angeles County have adopted the required changes. SCAG should consider providing technical assistance to cities directly, or at the subregional level, regarding the assessment of VMT, the development of thresholds of significance and mitigation measures. A regional approach to SB 743 implementation would not only provide consistency but may also support the further development of a quantifiable set of mitigation measures over time that reliably reduce VMT. Thank you again for the opportunity to comment. I look forward to our continued collaboration in advancing sustainable mobility strategies throughout the region.</p>	<p>Recognizing the potential impact SB 743 may have on reducing regional GHG emissions, SCAG is committed to providing the needed technical assistance to ensure its successful implementation at the local level throughout our region. In addition to the multiple workshops and stakeholder meetings hosted by SCAG throughout the SB 743 development process, SCAG has included SB 743 implementation assistance among the eligible project types for our Sustainability Grant Program (SGP). Three such grants were awarded by SCAG for SB 743 implementation projects for the City of Temecula, the San Bernardino County Transportation Authority (SBCTA), and the City of Los Angeles Department of Transportation (LADOT). These grant-funded efforts seek to ease the transition to the VMT assessment methodology for our local jurisdictions and to provide an implementation template for other local agencies throughout our region. In addition to the SGP grants, SCAG, in collaboration with LADOT, has been awarded a \$500,000 Caltrans Sustainable Communities grant to establish a pilot demonstration for a VMT Mitigation Exchange or Bank program. This pilot program seeks to evaluate the viability of implementing a regional or subregional VMT mitigation mechanism that would permit project-level VMT impacts to be counterbalanced by equivalent VMT mitigation activities in other areas of that region.</p>
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001454 Related Documents
0001454.01	<p>Page 10, Consider revising to include "reduced recurrent and non-recurrent congestion" under the Connect SoCal Guiding Principles.</p>	<p>Comment noted. Goals and guiding principles were developed through a comprehensive process engaging stakeholders, SCAG policy committees and Regional Council. Any changes proposed to goals and guiding principles will need to go through a similar process. However, SCAG will be happy to consider your suggestion in future plan updates.</p>
0001454.02	<p>Page 10, Consider emphasizing the role and connection between zero-emission/near-zero-emission technologies & reducing GHG emissions.</p>	<p>Thank you for your comment. Additional discussion on this topic is included in mode-specific technical reports such as Transit and Goods Movement, and in the Sustainable Communities Strategy Technical Report.</p>
0001454.03	<p>Page 28, Consider breaking out "transit" into bus and rail modes so as to show how much the roadway network is depended on e.g. 3.3% by bus and 0.5% by rail.</p>	<p>Comment noted.</p>
0001454.04	<p>Pages 28, 30, 31, 37, 39- Consider adding sources and years for each slice of data/statistics. Is the "existing" or "now" 2019? Or 2015? Unclear.</p>	<p>Comment noted. SCAG will add sources and years for each data/statistic to make the referenced information more clear.</p>
0001454.05	<p>Page 37 - Consider including other reasons for collisions along with their respective percentages. Also consider adding what type of collisions result in fatalities and serious injuries, consistent with MAP-21/FAST Act requirements.</p>	<p>Comment noted. In the SCAG region about 30 percent of all collisions are due to unsafe speed, exceeding the other top contributing factors, automobile right-of-way (20 percent) and improper turning (18 percent). A detailed breakdown on primary collision factors in the region is included in the Transportation Safety and Security Technical Report.</p>

ID	Comment	Response
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001454 Related Documents
0001454.06	Page 38 - Consider the future effects of connected and automated vehicles in improving safety.	Comment noted. Anticipated emerging technology impacts, including safety, are referenced in a subsequent section, "Planning for Disruption," as well as the Emerging Technology Technical Report.
0001454.07	Page 38, Consider adding "strategic" before "complete streets". Not every street within the roadway network is a viable or logical candidate for complete streets concepts.	Comment noted. The Plan has been updated.
0001454.08	Page 40, Consider adding the date of SB-1 passage (2017).	Comment noted. Suggested changes will be incorporated into the Final Connect SoCal.
0001454.09	Page 42, Consider adding a source for the claim that "ride-hailing and automated vehicles, will increase VMT and GHG emissions if their business models do not adapt". Both have a possibility of reducing VMT (as first-last mile options) and emissions (zero-emission/near-zero-emission technologies and slipstreaming/platooning). Additionally, consider explaining what their business models are, supporting the claim for their need to adapt, and what they will need to adapt to.	Thanks for your comment. Recent studies, including one from San Francisco, show that ride-hailing has increased congestion in the city. Additionally, by design, many or most ride-hailing trips include a portion with zero passengers, known as "deadheading." The paragraph will be amended, per your comment, to make this clearer.
0001454.10	Page 48, Revise to read "in areas vulnerable to rising seas."	Comment noted. The edit has been made to the referenced text.
0001454.11	Page 48, This draft plan will be adopted in 2020. Consider adding actual GHG reductions, if any, for the first target year given the goal of 8 percent per capita by 2020.	Comment noted. Achievement of the 2020 target is based on modeled data. Direct observed data on vehicle miles traveled or greenhouse gas emissions data is not yet available. SCAG has added clarification text to discussions about the 2020 target.
0001454.12	Page 51, Consider adding what trip purposes are associated with the "three miles or less" statistic, why "78 percent of these short trips [three miles or less] are made by driving", and why these trips may not be able to be effectively accommodated by "foot, bicycle, micro-mobility devices and slow speed electric vehicles..."	Comment noted. Figure 2 in the Active Transportation Technical Report provides Trip Purpose by Distance information. Without further research it would be speculative to detail why these trips may not be more effectively accommodated by modes other than driving.

ID	Comment	Response
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001454 Related Documents
0001454.13	Page 54, Consider explaining why "increased density at nodes along key corridors" is related to "Livable Corridors". Does higher-density development necessarily lead to "Livable Corridors"? Is the concept and definition of "Livable Corridors" universal to all residents within the SCAG region? How is "under-performing auto-oriented retail" defined and substantiated?	<p>Former US Transportation Secretary Ray LaHood defined livability as "a community where you can take kids to school, go to work, see a doctor, go to the grocery store, have dinner and a movie, and play with your kids in a park, all without having to get into a car." -Oct 25, 2016. Based on Corridor Planning studies funded by the SCAG Sustainable Communities Program (formerly Compass Blueprint), increased density at key nodes along major arterials facilitates more locally serving retail establishments that residents can walk or use other slow speed modes to access. This strategy is applicable anywhere in the SCAG region where there are major arterials with current or planned service by frequent, reliable transit. In those same studies under performing retail uses occur where there is an over-supply of retail. This is a function of retail square footage by type relative to residential population within a pre-determined driving distance. Where this oversupply occurs, there is too much competition within retail categories, thus driving individual stores' prices down and total retail sector revenue down as well. This can lead to degraded retail environments as property owners extract rents but do not re-invest in their properties. This negative feedback loop can result in lower sales tax collected, which is the opposite of the city's intent. Due to the increase in e-commerce this condition may be increasing in the region.</p> <p>Auto oriented uses are any retail locations with drive-thrus, parking in the front, and/or frequent curb cuts. This style of design increases turning movements for vehicles which increases conflict points, and decreases the comfort level of walking and biking.</p>
0001454.14	Page 56, Consider the effect "Parking Requirements Reform" will have on automotive idling, deadheading, and street parking.	Comment noted. Reducing parking requirements does not necessarily anticipate elimination of parking; rather, it provides flexibility to allow for improved coordination between the public and private sectors to consider a broad range of options. Reducing parking requirements has positive effects on housing affordability, induced demand, vehicle miles traveled generated by projects, usage of more sustainable modes of transportation and urban form.
0001454.15	Consider further quantifying the economic benefits and disbenefits of implementing cordon/area pricing.	Comment noted. SCAG plans to pursue further research on Go Zones, as described on Page 62.
0001454.16	Page 61 - Consider adding sources for each study included to support the implementation of user-fees and pricing strategies. Additionally, with the assumed future implementation of user-fees and pricing strategies, will SCAG advocate for the corresponding rescission of gas taxes and SB-1 given their ability to "more easily address the actual cost of driving"?	Comment noted. The Plan includes the conversion of the federal and state gas tax to a mileage based user fee beginning in 2030. The conversion will help address the revenue shortfall due to the increasing fuel efficiency and market penetration of alternative fuel vehicles.
0001454.17	Page 74 -Consider adding "Improve economic productivity" and "Increase freight mobility" under the "Focus on adding capacity" bullet point.	Comment noted. SCAG believes improving economic productivity and increasing freight mobility is adequately acknowledged and addressed in the plan.
0001454.18	Page 76, Consider adding I-710 Corridor Project to the list.	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001454.19	Page 78 - Consider adding "Add strategic highway operational and capacity improvements" under the "Truck Bottleneck Relief Strategy" bullet points.	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001454 Related Documents
0001454.20	Page 129 - Consider the effect that zero-emission/near-zero-emission technologies will have on SB 743 objectives of reducing VMT as a proxy to GHG emissions.	GHG emissions reduction is a cornerstone objective of Connect SoCal. The statewide implementation of the CEQA transportation impact assessment provisions of SB 743 will undoubtedly generate substantial VMT reduction benefits which will reduce GHG emissions produced by motor vehicles throughout the state. While technical discussion of zero emission vehicles and other alternative vehicle technologies is beyond the scope of the Performance Measures chapter, the Final Emerging Technology Technical Report includes detailed information regarding near-term and longer term technological innovations in transportation that will serve to reduce GHG emissions, improve safety, and modify travel behavior. The Final Sustainable Communities Strategy Technical Report includes a discussion of how technological innovations, including alternatively fueled vehicles, contribute toward achievement of the GHG emissions reduction and community sustainability goals of the SCAG region.
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001559 Related Documents Link
0001559.01	<p>1. Page 25 - Consider removing the DCCM initiative if it is not in operation. 2. Page 25 - "Consider revising the sentence on Metro TSP to: ""Metro implemented its first Metro Rapid lines in 2000 that use transit signal priority (TSP) technology in City of Los Angeles and other agencies in Los Angeles County""Metro TSP is not only provided by ATSAC, but by other agencies in Los Angeles County. In addition, other transit agencies in the Los Angeles County primarily use Metro's TSP (known as Metro Countywide Signal Priority) standards. Please contact Eva Moon, Metro Countywide Signal Priority Program Manager at PanMoonE@metro.net, for further information."3. Page 25 - Consider revising the sentence regarding TMCs: "In addition, the four Caltrans Districts (7,8,11, and 12) and most medium to large sized jurisdictions have Traffic Management Centers (TMCs) to monitor its traffic signal systems and ITS devices, and to manage natural and manmade disasters if that need were to arise."4. Page 25 - Didn't SCAG update its Regional ITS Architecture in 2018? The last update in the text said 2011. 5. Page 25 -"Please note that "Connect-IT" is Metro's/Los Angeles County ITS Architecture. It is not just a website, but the ITS Architecture available via website. Consider revising:"A more exhaustive list of ITS Examples in the SCAG region can be found in county's ITS Architectures. For example, Los Angeles County's ITS Architecture, named ""Connect-IT""", has been updated and posted on a website for easier access to agencies."6. Page 26 - Traffic Signal Priority/Preemption: This section sounds more "preemption" than priority. This section needs to separate "Transit Signal Priority" and Signal Preemption to not confuse the readers of the two strategies. 7. Page 26 - Typo on acronym: "STSP" should be "TSP"8. Page 27 -Instead of focusing on ATSAC, this bullet point should focus on "Central Traffic Control Systems" since most counties and cities in the SCAG region have these systems in place, not just LADOT.9. Page 27 - May want to include County of Los Angeles Information Exchange Network (IEN) as an Arterial, Highway and Freeway ITS Strategy. Several Los Angeles County agencies are connected to IEN to share traffic control data. Please contact Eva Moon, Metro IEN Project Manager at PanMoonE@metro.net, for further information.</p>	Thank you for your comment. These sections of the Congestion Management Technical Report will be updated per the comments.

ID	Comment	Response
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001559 Related Documents Link
0001559.02	<p>10. Page 28 -Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.11. Page 29 - Roadways: This section is titled "Roadways", however, it discusses more the freeway system and how information is fed to Caltrans and CHP TMC. There are other agencies and jurisdictions that operate and maintain TMCs along roadways and freeways. Consider changing this section to reflect both the local roadways and freeways.</p> <p>12. Page 29 - Transit: Other transit operators that have TSP on local lines, and are not necessarily "Rapid Lines". Consider removing "Rapid lines" or differentiating between "local" and "rapid". Metro and Torrance Transit are "rapid", Foothill Transit and Culver City Bus is "local" 13. Page 29 -Please add G-Trans (Gardena) and Pasadena Transit to the list of TSP (in development) as local lines. These agencies are using Metro's signal priority standards.14. Page 34 -"Table 4: Metro project. Please remove FRATIS Expansion and replace with the following:""Drayage, Freight, and Logistics Exchange (DRAYFLEX) - Development of a goods movement optimization tool to improve container movements. In addition, the development of a freight travel application for real-time route guidance and congestion alerts.""Project Status - Existing, Timeframe: Short"15. Page 37 -"Table 4: RIITS should be ""Existing"" and not ""Planned""In addition, RIITS should be included in the body of the text in this document. Consider adding RIITS to the Arterial, Highway, and Freeway ITS Strategies section.Please contact Kali Fogel, RIITS Program Manager, at fogelk@metro.net to verify the language."</p>	Thank you for your comment. The terminology will be reexamined and corrected based on your suggestions.

ID	Comment	Response
<i>Submitted by</i>	Los Angeles County Metropolitan Transportation Authority	Submittal 0001559 Related Documents Link
0001559.03	<p>1. Page 15 - "Integrated Corridor Management: Please consider adding towards the end of the paragraph as Metro has completed a regional study for future ICM strategies.</p> <p>""Metro prepared the Regional ICM Assessment that analyzed all freeways and adjacent arterials in Los Angeles County for potential ICM implementation. This study is being further evaluated by Caltrans District 7 for prioritization of future ICM corridors."" "2. Page 17 - I-105 ATM Congestion Relief Analysis Study (2014): With the I-105 Expresslane in the environmental phase, it is highly unlikely that the I-105 ATM strategies would be implemented based on the footprint of the Expresslanes project.3. Page 26 - Adaptive Traffic Control Systems: This section tends to focus on Caltrans, when other local agencies have deployed adaptive systems with different vendors. Caltrans and LADOT are running the same adaptive system. Other agencies have deployed adaptive systems from other vendors like Econolite and McCain. This section may want to focus more on the overall concept of Adaptive Traffic Control, as well as Traffic Responsive Strategies, and mention Caltrans and LADOT as implementers. In addition, the statistics shown for the benefits of ATCS are over 10 years old. With traffic volumes increasing, are these numbers still accurate?4. Page 2 -Consider deleting "reduce the number of single occupancy vehicle (SOV) trips on our roadways so that we can" and identify the reduction of SOV trips as a bullet below as a strategy for reducing congestion. 5. Page 3 - Operational Improvements narrative is not included or discusses, as there are significant advances that are/continue being analyzed and made to improve efficiency and safety of travel trips, which is inclusive of all modes of transportation. Consider including narrative for Operational improvements, may be inclusive of auxiliary lanes, appropriate curb turning radii, sight distance and ramp configuration corrections.6. Page 4 - Consider renaming the header "Regional Significance" with Highway and Arterial Regional Significance". This paragraph discusses importance of highway/arterial backbone significance for mobility in LA County. However, after this paragraph there is no mention of highway/arterials, it goes straight to transit and other modes of transportation. Transit and other modes of transportation rely on the highway/arterial infrastructure.</p>	Comment noted. Proposed revisions will be considered in the Final Connect SoCal.
0001559.04	7. Page 5 - Consider rephrasing or deleting "Active Transportation is low-cost" 8. Page 5 - Consider rephrasing or deleting "active transportation infrastructure also improve safety for all roadway users"	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001559.05	1. Page 72-91 - For Table 9, please ensure consistency with formal comments submitted on complete project list. 2. Page 90 - Table 9: Goods Movement Project List - Please remove I-105 ICM/ATM Elements from the list as this is not a Goods Movement project. This project will be led by Metro. 3. Page 90 - Table 9: Goods Movement Project List - Please update FRATIS to DrayFLEX. DrayFLEX is a Metro-led project. FRATIS is an old program from Federal Highway Administration.	1. SCAG will ensure consistency with these comments. 2. SCAG will remove the project referenced. 3. FRATIS has been updated to Drayflex.

ID	Comment	Response
<p><i>Submitted by</i> Los Angeles County Metropolitan Transportation Authority <i>Submittal</i> 0001559 Related Documents Link</p>		
0001559.06	<p>1. Page 9 - Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.2. Page 9 & 19 -Consider renaming "Advanced ITS" to just "Connected Vehicles"3. Page 19 -Advanced ITS: Please remove the projects being conducted by Metro. Some of these are conventional traffic engineering practices and ITS strategies.4. Page 19 - Advanced ITS: Please replace with: "Some of the projects conducted by Metro and local agency partners include: Drayage, Freight, and Logistics Exchange (DrayFLEX); Signal Phase and Timing (SPaT) pilot demonstrations (Eco-Drive, Metro OrangeLine); Partial Automation of Truck Platooning; and Predictivce Data-Driven Vehicle Dynamics and Powertrain Control." 5. Page 19 - Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.6. Page 23 - Table 2: Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.7. Page 25 - Consider renaming "Advanced ITS" to just "Connected Vehicles"8. Page 25 - Industry standard has used "Connected/Automated Vehicles" instead of "Automated/Connected Vehicles". Please consider changing globally throughout the RTP.</p>	<p>Thank you for your comment. The terminology will be reexamined and corrected based on your suggestions.</p>
0001559.07	<p>Page 52 - The paragraphs and language that describe Metro and LADOT TSP are not accurate and needs to be updated. Please contact Eva Moon, Metro Countywide Signal Priority Program Manager at PanMoonE@metro.net, to clarify the technologies between the two systems.</p>	<p>Thank you for your comment. Page 52 of the Transit Technical Report will be edited per the comment.</p>
<p><i>Submitted by</i> Natural Lands Coalition <i>Submittal</i> 0001519 Related Documents Link</p>		
0001519.01	<p>Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) called Connect SoCal. In 2012, with release of that RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and associated policies within the SCAG plan. This 2020 Coalition was specifically formed to focus on the natural and farmland policies within Connect SoCal and the associated Natural and Farmland Appendix. This year, the Coalition is more diverse, more inclusive, and more geographically distributed than the 2012 and 2016 Coalitions—with every county being represented. Our 48-member alliance includes unincorporated community groups at the local level all the way up to national conservation non-profits.</p>	<p>Thank you for your comment. SCAG appreciates and commends the contributions to conservation made by non-profit entities. SCAG will continue to work with this important stakeholder group in order to implement conservation strategies listed in Connect SoCal.</p>
0001519.02	<p>We are pleased to see SCAG advancing the preservation of natural and farmlands by including it as one of the 10 goals for the plan for the first time in your organization’s 55-year history. We believe this is a step in the right direction. We’ve reviewed the RTP/SCS and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify or strengthen the language in Plan and/or the Appendix, as well as link the goals of the RTP to SCAG’s aim of reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT).</p>	<p>Thank you for your comment.</p>

ID	Comment	Response
<i>Submitted by</i>	Natural Lands Coalition	Submittal 0001519 Related Documents Link
0001519.03	<p>SUCSESSES SINCE 2016 AND LOOKING AHEADMuch work has been done over the last four years by the SCAG and consultants as it relates to the Natural and Farmlands Program—thanks to the staff’s attention and the continued efforts of the Working Group. We are excited to see The Nature Conservancy begin its work to develop a six-county wide GreenPrint that focuses on important natural resource, climate, and risk areas. We stand ready to assist in this effort when the need arises.SCAG has a tremendous opportunity with the 2020 Plan. The state has provided ambitious reduction targets for both GHG emissions and VMT for passenger and light duty vehicles. Conservation of our natural lands can have a significant role in both. Converting land from its natural state to more urban uses increases GHG emissions—while leaving land as is, allows the vegetation and soil to sequester carbon. Further, most greenfield developments are at the urban fringe—far from services, transit, and amenities, thus increasing both GHG emissions and VMTs. Preservation of those fringe greenfield sites will eliminate the need for any VMT for projects that could have been built. In other words, conservation of natural and farmlands can reduce both GHG and VMT to help SCAG achieve its mandate.Further, we appreciate SCAG’s recognition of areas that should not be developed. Specifically, the language on Page 47 that states Connect SoCal will “de-prioritize growth on lands that are vulnerable to wildfire, flooding and near term sea–level rise.” Building in locations with these significant vulnerabilities ignores public safety, the human and financial costs, and the realities that face our region.Much of the last four years has been spent researching, gathering and vetting the data, surveying local jurisdictions, and preparing for the regional GreenPrint. The Coalition continues to believe SCAG has the leadership in place, the right staff at the helm, the homework done, the support by the conservation community, and the interest and attention of the natural resource agencies to now transition to actually implementing conservation activities. This is your opportunity to walk the walk, instead of simply talking about it. Again, we stand ready to help conserve land throughout Southern California for the benefit of its millions of residents.</p>	Thank you for your comment.
0001519.04	<p>CHAPTER 2: SOCAL TODAYWe acknowledge the regional challenge associated with needing new affordable housing to accommodate our growing population, and the simultaneous challenge with making sure those new units are built near transit areas, is city-centered, and does not build on greenfield sites or high risk areas (like those prone to wildfires or sea level rise).We concur with the Plan’s conclusion that our natural and farmlands are under severe development pressure. However, it worth noting that for every dollar invested in conserving natural lands, an estimated \$2.37 is generated through local sales, recreation purchases, gas, and snack/food purchases from outdoor enthusiasts. Therefore, conservation is an economic pump too.</p>	Thank you for your comment.
0001519.05	<p>We agree that many counties and cities have done commendable activities to preserve natural and farmlands within the region. However, one key element missing from this equation is the conservation community. There are scores of non-profits, community groups, and land trusts that have preserved thousands upon thousands of acres across the Southland. Acknowledgement of the contributions of the non-profit world have been completely omitted from the SoCal Connect Plan. And, as you know, the mission of our cities and counties is not to protect land, and that’s why the need for the conservation non-profits is so important. Please don’t ignore our work.</p>	Thank you for your comment. SCAG appreciates and commends the contributions to conservation made by non-profit entities. SCAG will continue to work with this important stakeholder group in order to implement conservation strategies listed in Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	Natural Lands Coalition	Submittal 0001519 Related Documents Link
0001519.06	Further, it seems rather naïve to believe that plans and policies preserve habitats or farmlands over the long term as the document indicates (Page 36). Plans and policies change at the whim of the elected body. The only way to have land permanently preserved is through acquisition, easements, or enrolling it in a state/federally adopted Conservation Plan.	Thank you for your comment. SCAG acknowledges the importance of acquiring land for permanent conservation. Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and support long-term management and stewardship of mitigated properties.
0001519.07	CHAPTER 3 – A PATH TO GREATER ACCESS, MOBILITY & SUSTAINABILITY On page 47, the Plan notes that regional challenges are being addressed to identify opportunities and barriers to development. Since conservation is now in the top 10 goals, we’d ask that you also identify the opportunities and barriers to conservation. For example, the strategies identified in the document to promote a Green Region could be expanded to include Enhanced Infrastructure Finance Districts (EIFD). EIFDs can also be used to conserve natural lands—open space is part of the public infrastructure as well as roads, libraries, and transit centers—all of which provide a community-wide benefit.	Thank you for your comment. SCAG is presently expanding our efforts in Tax Increment Financing for Sustainable Growth as a Key Connection within Connect SoCal - specifically to support the infrastructure needed to expedite housing construction and reduce costs. SCAG will consider your suggestion to support the use of tax increment financing tools for conservation in addition to housing.
0001519.08	CHAPTER 5 – MEASURING OUR PROGRESS Within Chapter 5, the document concludes that greenfield development can be reduced by 36% (Page 118 and 128) by focusing development in higher density areas where infrastructure already exists. We agree, in part. Some formal conservation action needs to occur to those greenfield properties in order to permanently protect them (such as through acquisition or a conservation easement), otherwise the can is being kicked down the proverbial road where a new development project will be proposed for that greenfield land in the future.	Suggested mechanisms for conservation are listed in Chapter 3 of Connect SoCal as well as in the Natural & Farmlands Conservation Technical Report. One example included is Transfer of Development Rights (TDR), which can be an effective tool to achieve regional growth outcomes and conservation objectives by augmenting and leveraging available public funds and programs, providing permanent protections for important resources, and focusing development in areas that already have infrastructure capacity. Additionally, Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and support long-term management and stewardship of mitigated properties.
0001519.09	NATURAL AND FARMLAND APPENDIX Policies There are five policies included in the Appendix specifically related to natural and farmlands. On the whole, we are disappointed that three of the policies (3, 4, and 5) are repeated from the 2016 Plan. This implies that no progress has been made on them. If this is true, reflecting on the reasons for the lack of progress may be beneficial before suggesting a repeat of the same policies. Alternatively, adding language that implies forward progress would be an improvement. That said, the Natural Lands Coalition supports the inclusion and intent of natural and farmland policies, but offers the following suggestions on the existing policy language:	Thank you for your comment. The referenced policies in the Natural & Farm Lands Technical are carried forward because they are important for maintaining consistency while guiding SCAG's regional conservation strategies and programs through multiple RTP/SCS cycles.

ID	Comment	Response
<i>Submitted by</i>	Natural Lands Coalition	Submittal 0001519 Related Documents Link
0001519.10	<p>Policy #1 – Continue to Engage StakeholdersWe support expanding and deepening relationships and would suggest SCAG focus on innovative conservation acquisition, restoration, and funding activities being done throughout the state for inclusion in future Natural and Farmland Working Group meetings. For example, the creation of the Martis Fund near Lake Tahoe. The Fund’s primary role is managing and dispersing financial resources raised in connection with real estate sales at Martis Camp. The mission of the Fund is to support programs to conserve open space; manage and restore habitat and forest lands; and promote opportunities for workforce housing and related community purposes in the Martis Valley region. Other examples, are the use of EIFDs to fund conservation projects locally as part of the community-wide benefit or public-private partnerships to conserve and restore lands, like the newly created Los Cerritos Wetlands Fund. Therefore, we propose the following language be added to the first policy:• Provide substantive examples of conservation funding, public-private partnerships, and policies that promote adding lands into protected status, improving the ecological integrity of the land, and helping finance transactional and long-term management costs.</p>	Thank you for your suggestion. Appropriate edits have been made in the Plan to address this comment.
0001519.11	<p>Policy #2 – Develop Regional GreenPrintThis is a great next step to the 2016 Plan and we support this policy as is.</p>	Thank you for your comment.
0001519.12	<p>Policy #3 – Encourage Advance Mitigation ProgramsThis is a repeated policy from 2016’s Plan. No new transportation measures have been adopted since the last Plan, and based on the Connect SoCal document (Pages 99 and 100), all of the eight already adopted transportation measures have decades to go before they will sunset or be considered for renewal. Meanwhile other infrastructure projects and programs being developed could include a Regional Advance Mitigation Program (RAMP). Those opportunities need to be considered early (i.e., prior to adoption). Looking forward at other possible ways RAMPs can be included regionally would be a step forward—as opposed to repeating the same goal as 2016. Consequently, we propose the following language be added to the third policy:• Engage with agencies developing infrastructure plans to promote the inclusion of a RAMP prior to adoption.</p>	Thank you for your suggestion. The language regarding a Regional Advance Mitigation Program (RAMP) in the "Next Steps" section of the Natural & Farm Lands Conservation Technical Report is intentionally broad to provide flexibility in future RAMP design.
0001519.13	<p>Further, it is unclear how the RAMP initiative will “support long-term management and stewardship of mitigated properties.” In most instances, the lands acquired or restored are part of a Natural Community Conservation Plan and/or Habitat Conservation Plan and as such are required to provide a non-wasting endowment that covers stewardship, access, emergencies, and changed circumstances. Unless it is clarified and because this can be misconstrued as providing financial, management, or ownership support, we suggest deleting the sentence:• The initiative will also support long-term management and stewardship of mitigated properties.</p>	Thank you for your comment. To clarify the intent of the Regional Advance Mitigation Program, the referenced sentence has been changed in the Plan to: "The initiative can also support long-term management and stewardship of mitigated properties."

ID	Comment	Response
<i>Submitted by</i>	Natural Lands Coalition	Submittal 0001519 Related Documents Link
0001519.14	<p>Policy #4 – Align with Funding Opportunities and Pilot Programs This is a repeated policy from 2016’s Plan. How can this policy be reframed to be more future oriented? As mentioned above, local agencies are certainly not the only ones seeking funds for conservation activities—and sometimes conservation is not the local agency’s priority at all. Additionally, if we continue to “seek planning funds” conservation goals may never be achieved. We don’t have time to lose as development pressures continue to threaten important landscapes. Consequently, we propose the following language be modified in the fourth policy:</p> <ul style="list-style-type: none"> • SCAG aims to help local agencies and non-governmental organizations seek planning and implementation grants, including, but not limited to Cap-and-Trade auction proceeds that could advance acquisition and restoration projects locally and regionally. We suggest the following language be included at the end of the sentence above: • Support, such as letters and testimony, for agencies and non-governmental organizations applying for local, regional, state or federal funding to preserve lands through willing-seller acquisitions or by restoring ecosystems to their native habitat. 	Thank you for your suggestion. Appropriate edits are reflected in the Plan to address this comment.
0001519.15	<p>Further, the policy focuses on Pilot Programs and yet no commitment is made to that end. What exactly will SCAG do to launch a Pilot Program related to conservation of our natural and farmlands? Since we are unclear as to the intent, either the title needs to be adjusted or the policy language needs to be modified to capture the intent.</p>	Thank you for your comment. Appropriate edits have been reflected in the Plan to address this comment.
0001519.16	<p>Policy #5 – Provide Incentives for Jurisdictions to Work Across County Lines This is a repeated policy from 2016’s Plan. We’d like to understand how this policy can be reframed in terms of a “next step” for the 2020 Plan. Since the 2016 Plan, SCAG has publicly supported the Liberty Canyon Wildlife Bridge in Los Angeles County, and also benefiting Ventura County. Since then, several critical wildlife corridors are even more threatened with development pressure including the Pechanga Corridor in Riverside County, which if it lost to development, could impact conserved lands in Los Angeles, Orange, San Bernardino, Riverside and San Diego Counties. Additionally, the San Bernardino Mountain – San Jacinto Mountain connection across the 10 Freeway impacts multiple landscapes as well. We suggest the following language be included at the end of the fifth policy:</p> <ul style="list-style-type: none"> • Working collaboratively across jurisdictions with multiple agencies and stakeholders to identify the most important wildlife corridors is essential. 	Thank you for your suggestion. Appropriate edits are reflected in the Plan to address this comment.
0001519.17	<p>New Opportunities We were pleased to see the new section “Opportunities” in the Appendix. Based on the FY2020-2021 Governor’s Budget, it appears some funding is available statewide for natural lands in either the Cap and Trade funds or the Climate Resiliency Bonds. However, the Greenhouse Gas Reduction Fund is only one source and it isn’t a reliable funding source for conservation. Consequently, we hope SCAG considers bolstering this section to include other funding partners such as the Wildlife Conservation Board, California Department of Parks and Recreation, the Coastal Conservancy, Rivers and Mountains Conservancy, Coachella Valley Mountains Conservancy, etc. and their associated grant programs.</p>	Thank you for your comment. The referenced text has been revised to clarify that the list of funding opportunities is from the Greenhouse Gas Reduction Fund.

ID	Comment	Response
<i>Submitted by</i> Natural Lands Coalition Submittal 0001519 Related Documents Link		
0001519.18	<p>Our natural lands are among the most unique in the world. As a global hotspot of biodiversity—where our landscapes and the plants and animals in them are threatened with urbanization—time is of the essence to take action. We recognize the many co-benefits that come with land conservation, such as recreational opportunities, outdoor education, improved water quality, preservation of cultural resources, protection of habitat for threatened and endangered species, etc. And, similarly, preservation of our agricultural lands has many co-benefits as well, such as wildlife movement areas, pollinator habitat, local food supply, and 4-H type activities.</p>	Comment noted.
0001519.19	<p>We individually and collectively offer our assistance to SCAG as this process unfolds and as the Plan is considered for adoption. Similar to the letter submitted in 2016 from the Coalition, we urge SCAG to consider implementing a program like the One Bay Area Grant program to align conservation and development priorities across the region. Details have been included of that language as an enclosure. Again, thank you for the opportunity to comment and provide substantive input.</p>	Thank you for your comment and enclosure information regarding the One Bay Area Grant program.
<i>Submitted by</i> Omnitrans Submittal 0001280 Related Documents		
0001280.01	<p>In Figure 4.7 Growth in Transit Operating & Maintenance Costs, it is not possible to tell which agency is represented by which line on the graph because the blue and green colors in the graph are too similar.</p>	Proposed revisions will be considered in the Final Connect SoCal.
<i>Submitted by</i> Orange County Business Council Submittal 0001487 Related Documents Link		
0001487.01	<p>Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) Draft Connect SoCal Plan ("the Plan"). Orange County Business Council (OCBC) appreciates your consideration of all stakeholders' public comments. OCBC represents and promotes the business community, working with government and academia, to enhance Orange County's economic development and prosperity in order to preserve a high quality of life. OCBC serves as an influential voice for solving Orange County's transportation challenges in collaborative, effective ways. OCBC advocates for equitable funding from state and federal sources for highway and transit improvement projects, more efficient interoperability between transportation modes and other objectives that support Orange County's infrastructure. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) offers an excellent opportunity for SCAG's six counties to address the region's intersecting transportation, housing and climate challenges. OCBC is submitting the following comments.</p>	Thank you for your comments. Comments noted.

ID	Comment	Response
<i>Submitted by</i>	Orange County Business Council	Submittal 0001487 Related Documents Link
0001487.02	<p>OCBC applauds SCAG's attempt at reducing daily per capita vehicle miles traveled (VMT) by improving transit reliability and encouraging congestion pricing through express lanes and "go zones". Generally, OCBC is supportive of these strategies. The region needs a strong, aspirational vision for reaching VMT reduction targets, and the Plan provides that vision thoroughly. OCBC also commends SCAG for recognizing that, while building new roads is not a sole solution to congestion relief, ongoing maintenance and capital improvements for existing infrastructure are sorely needed throughout the region. OCBC agrees that gaps and choke points in the region's transportation infrastructure must be addressed. OCBC understands that SCAG must account for the needs of six counties when drafting the RTP. Each county has specific needs, and OCBC acknowledges that SCAG makes every effort to equitably support each county. While Los Angeles County is more populous, it is roughly three-fourths as dense as Orange County. Orange County is the densest county within SCAG's jurisdiction by a wide margin.</p>	Thank you for your comments. Comments noted.
0001487.03	<p>The upcoming Regional Housing Needs Assessment (RHNA) cycle will concentrate density in Orange County even further. OCBC recommends that SCAG reconsider any other qualifying transit capital projects in Orange County to ensure that funding is distributed as equitably as possible. considering its density. Furthermore, housing needs cannot be met by densification alone. Providing for just one percent more land in "edge development"-specifically in Inland Empire-must be reconsidered.</p>	<p>Thank you for your comment. SCAG remains committed to securing funding to achieve regional goals, such as those you describe. Furthermore, additional funding and supporting indirect financing mechanisms for housing development are key SCAG work programs going forward. The Inland Empire remains an area of future growth; however, in order to better align the 6th Cycle RHNA methodology with statutory requirements regarding low-wage jobs and affordable housing locations as well as to promote an equitable distribution of the state-mandated 1,341,827 housing units, job-rich areas including Orange County also see increases compared to past cycles. Also see Master Response #1 regarding RHNA.</p>
0001487.04	<p>The following are OCBC's comments on specific components of the RTP: Pages 65 to 69 detail the Plan's vision for regional transit. OCBC concurs with SCAG that mobility and sustainability goals depend on increasing transit accessibility and ridership. Regional agencies have invested billions into improving and expanding services to achieve this outcome. Yet, ridership continues to decline despite these investments. The RTP notes on Page 65 that first/last mile connections to rail stations, support for Metrolink's Southern California Optimized Rail Expansion, and extensive local investments in transit and rail networks are essential for transit to thrive. SCAG estimates that the Plan will increase transit use for work trips by three percent. OCBC applauds the Plan for reversing the trend of ridership decline and offers the comments below for SCAG's consideration to further enhance the Plan's impact on transit ridership:</p>	Comment noted.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Business Council <i>Submittal</i> 0001487 Related Documents Link</p>		
0001487.05	<p>Public Perception is a Root Cause of Ridership Decline: The aforementioned strategies are undoubtedly necessary, but OCBC recommends that SCAG evaluate other strategies to address the causes of ridership decline. Page 131 of the Plan states that better, more reliable transit service would encourage commuters to choose transit instead. However, there are significant cultural barriers that permeate throughout the region. The perception of transit as unreliable and unsafe-regardless of empirical data proving or disproving these perceptions-threatens to limit the effectiveness of accessibility and reliability improvements. Negative perceptions of transit persist despite ongoing, heavy investment in transit. Therefore, OCBC recommends that SCAG explore options to assist regional agencies and local governments in changing these perceptions through tangible safety improvements, public relations campaigns and innovative experimentation</p>	<p>Thank you for your comment. SCAG is conducting a number of studies regarding transit ridership as it relates to safety and neighborhood change. SCAG will continue to work with its transit agency partners to identify solutions and disseminate best practices to support improved transit and increased ridership.</p>
0001487.06	<p>Potential Grassroots Solution: OCBC and its partners have proposed a grassroots campaign titled "Just One Trip a Week". The campaign would be a new movement to encourage alternative modes of mobility, including transit and active transportation, in a new way. The campaign invites workers and residents to take just one trip a week with a different mode of transportation than their car. Importantly, cities could collaborate with the business community to implement an app-based, locally-centered rewards program for campaign participants. With proper marketing and implementation, the campaign offers an incentive to utilize alternative modes of transportation while promoting their environmental and societal benefits. A grassroots campaign like Just One Trip a Week is unprecedented in the SCAG region, but blueprints to model the program can be found in other parts of the nation and the world. OCBC encourages SCAG to further examine the program's potential to create a sizeable dent in VMT and greenhouse gas emissions reduction targets with technical and financial support. Attached is a summary of the program. OCBC appreciates the opportunity to offer input on the Draft Connect SoCal Plan. The RTP is the result of careful, comprehensive research. OCBC is proud to partner with SCAG on shared initiatives and looks forward to hosting Director Ajise in late February to discuss the Plan and RHNA further</p>	<p>Thank you for your comment. SCAG supports and Connect SoCal identifies programs and investments to increase multi-modalism in the region, promote Transportation Demand Management (TDM) strategies, and reduce vehicle miles traveled (VMT) and single-occupant vehicle (SOV) travel.</p>
<p><i>Submitted by</i> Orange County Council of Governments <i>Submittal</i> 0001465 Related Documents Link</p>		
0001465.01	<p>On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.</p>	<p>Thank you for your comments on the Connect SoCal and associated PEIR. Comments noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001465 Related Documents Link
0001465.02	<p>As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.</p>	<p>Comment noted. SCAG appreciates the time and effort expended by OCCOG and the member jurisdictions in reviewing and commenting on the Draft Connect SoCal. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001465.03	<p>The OCCOG TAC review and analysis was discussed by the OCCOG Board at the January 23, 2020 Board of Directors meeting and serves as the basis for OCCOG’s comments. The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.</p>	<p>Comment noted. The Final Connect SoCal will include a section under the Public Participation & Consultation Technical Report with all comments and attachments received during the comment period and respective responses. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001465.04	<p>1. Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research. The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.</p>	<p>Comments noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001465 Related Documents Link
0001465.05	<p>High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs) The alignment of SCAG’s Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating “transit access.” OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG’s definition for HQTAs. The draft RTP/SCS defines HQTAs as “generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.” The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are “corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The definition for HQTCs does not account for walkability. OCCOG recommends revising the identification of HQTAs to reflect the nuance with certain HQTCs that fail to meet the “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop). Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTCs segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.</p>	<p>The definition of HQTAs will be updated to clarify that freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTAs. The Final Connect SoCal will reflect HQTAs maps that do not include HQTAs along freeway segments that do not have transit stops and are not accessible to transit riders.</p>
0001465.06	<p>Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.</p>	<p>Comment noted. SCAG will consider your suggestions in future RTP/SCS update cycles.</p>
0001465.07	<p>Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.</p>	<p>Comment noted. SCAG will consider your suggestions in future RTP/SCS update cycles.</p>

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0001465.08	Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024 cycle to allow for a more robust review process that would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed prior to asking the Regional Council to adopt the final plan.	Comment noted. SCAG will consider your suggestion in future RTP/SCS update cycles.
0001465.09	Do Not Cut off Regional Council Discussion Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.	Comment noted.
0001465.10	Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.	Comment noted. SCAG will consider your suggestions for future RTP/SCS update cycles.
0001465.11	OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.	Thank you for your comment.

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0001465.12	<p>On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities. CDR requested a copy of the final draft growth forecast dataset to confirm that all the technical corrections had been included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.</p>	<p>Thank you for your input and partnership in development of the Growth Forecast, Forecasted Development Pattern and Growth Vision strategies for Connect SoCal. The final Connect SoCal growth totals reflect local input at the jurisdictional level in all cases. Prior to the release of Connect SoCal, SCAG initiated a peer review with jurisdictions to review the neighborhood level growth projections included in the Plan to ensure that development projects already underway (i.e. entitled projects) were captured in Connect SoCal's Forecasted Development Pattern and that locally planned capacities were adhered to for allocating growth. After reviewing this input and finalizing the Connect SoCal Forecasted Development Pattern, SCAG emailed a letter to each jurisdiction starting February 21 that included a detailed methodology document for SCAG's Growth Vision. Jurisdictions were also given access to their jurisdictional and neighborhood level Forecasted Development Pattern data via SCAG's Scenario Planning Model - Data Management Site. Throughout this effort, SCAG engaged with stakeholders from the Technical Working Group, and also provided an update on the peer review exercise to the Community, Economic, and Human Development Policy Committee.</p>
0001465.13	<p>We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001465.14	<p>Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).</p>	<p>Comment noted. Also see Master Response #1 regarding RHNA.</p>
0001465.15	<p>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.</p>	<p>Thank you for your comment. SCAG does not recommend specific companies be granted favor over others, but it is in the purview of SCAG to provide guidance regarding sustainability, safety, equity and other regional concerns that might arise from a category of technologies. For example, if a technology is proven to increase greenhouse gas or criteria pollutant emissions, it is our responsibility to advise our member agencies that such a technology is not in line with our state-mandated goal to reduce emissions.</p>

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0001465.16	Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG’s desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., “TNCs” not “Uber and Lyft” or “zero emissions” instead of “electrification”).	Comment noted. SCAG’s policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. In addition, SCAG communicates with Hydrogen Fuel Cell industry partners to exchange information and knowledge. Plug-in electric vehicles are specifically analyzed due to the transportation/land use policy nexus regarding charging station siting. Where it enhances understanding of a topic, specific providers may be named. In the Emerging Technology Technical Report, SCAG identifies various new innovations that show promise in meeting Connect SoCal goals.
0001465.17	Language throughout the draft Connect SoCal Plan and PEIR and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues, such as active transportation, public health, and land use policy. While these issues are important, using opinion-based and emotionally-charged language is inappropriate in this context.	Comment noted. SCAG will consider your suggestion in the Final Connect SoCal. PEIR related comments are addressed in Chapter 9.0, Responses to Comments and Chapter 10.0 Corrections and Revisions of the Final PEIR, as needed.
0001465.18	Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.	Comment noted.
0001465.19	As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies’ regulatory measures. OCCOG recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems inappropriate any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language “can and should” for mitigation measures addressed to local agencies is overreaching.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001465.20	Recommendation: Change language in all project level mitigation measures to read “can and should consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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0001467.01	<p>It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: "Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations." Similar language is included in some mitigation measures.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001467.02	<p>Throughout the 2020 RTP/SCS, PEIR, and associated appendices, there are references to "cities". Since the SCAG region also includes counties, it is recommended that references to "city" or "cities" are changed to "jurisdiction" or "jurisdictions" where appropriate. Recommendation: Change references to "city" or "cities" to "jurisdiction" or "jurisdictions" where appropriate.</p>	<p>Comment noted. SCAG will consider your suggestion wherever applicable in the Final Connect SoCal. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10.0, Corrections and Additions, of the Final Connect SoCal PEIR.</p>
0001467.03	<p>There are many different abbreviations used throughout the documents. To avoid confusion and help persons unfamiliar with technical jargon, spelling out the acronyms prior to using them for the first time is common; however, this is often missing in the Connect SoCal documents. Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.</p>	<p>Comment noted. SCAG will consider your suggestions wherever applicable.</p>
0001467.04	<p>When a report of such complexity as the Connect SoCal Plan is produced, it is common for tables, maps, and other graphics to be used or referred to in a manner that could divorce them from the context in which they are presented. For instance, someone may come upon a chart that explains a topic they are researching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without source information embedded in the graphic, information can be spread without proper attribution. We understand that it may "look cleaner" to not include a source, date, and citation for data but best practices for technical reports include adding sources to all graphics. Recommendation: Make it a SCAG style guide policy to include the source and date of all data used in tables, charts, maps, infographics etc., included in technical reports.</p>	<p>Comment noted.</p>

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0001467.05	Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, therefore, it should not be assumed that they will be approved. Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001467.06	The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.	Thank you for your comments. Comments noted.
0001467.07	We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels.	Comment noted.
0001467.08	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.	Comment noted. SCAG will consider such suggestions on a case by case basis.
0001467.09	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents	Comment noted. SCAG will consider your recommendation wherever applicable.
0001467.10	Review use of “cities”. Word “jurisdictions” should often be used to include counties and incorporated cities, not just incorporated cities.	Comment noted. SCAG will consider your recommendation wherever applicable.
0001467.11	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.	Comment noted. SCAG will consider your recommendation wherever applicable.
0001467.12	Clearly define what the development pattern is for the SCS.	Thank you for your comment. Please see the Growth Vision section of the Sustainable Communities Strategy Technical Report for this information.

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0001467.13	All maps growth. forecast data Add: "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."	Thank you for your comment. Please refer to the Guiding Principles used in developing the growth forecast, as described in the Demographics and Growth Forecast Technical Report. These include Guiding Principle #1 which provides that Connect SoCal is adopted at the jurisdictional level, and Guiding Principle #4 which indicates that TAZ level data or any data at a geography smaller than the jurisdictional level has been utilized to conduct required modeling analyses and is therefore advisory only and non-binding, given that sub-jurisdictional forecasts are not adopted as part of Connect SoCal.
0001467.14	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:- Technology and associated privacy issues, - Cost of implementation and administrative methods for fee collection/revenue allocation, - Equity concerns and exemptions/credits, as applicable, - Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and - Economic assessment. SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to source criteria to ensure equitable distribution of funds.	The Transportation Finance Technical Report specifies that return-to-source guarantees for federal and state programs is a guiding principle used to identify reasonably available revenues. SCAG will update the plan to clarify that this guiding principle applies to local funding programs as well.
0001467.15	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.	Thank you for your comment. SCAG is actively working with its rail partners, including CHSRA, the LOSSAN Agency and the Southern California Regional Rail Authority in the planning, coordination and funding of these critical rail projects to increase mobility in our region. SCAG also regularly updates its Regional Council and Transportation Committee on passenger rail updates.
0001467.16	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73,I-605, or north of I-605 on I-405 as depicted in the proposed regionalexpress lanes network. Furthermore, the 2020-2045 RTP/SCS shouldclearly recognize that the proposed regional express lane network issubject to further study to evaluate right-of-way impacts, communityissues, and overall feasibility.	Thank you for your comment. SCAG, in partnership with the California Department of Transportation (Caltrans), the Federal Highway Administration (FHWA), the Los Angeles County Metropolitan Transportation Authority (Metro), the Orange County Transportation Authority (OCTA), the San Bernardino Associated Governments (SANBAG), and the Riverside County Transportation Commission (RCTC) collaborated on the development of a regional concept of operations for a regional express lane network. The Concept of Operations provides a blueprint for a regional express lane network that integrates express lane facilities into a regional system with consistent or compatible operating, design and policy rules. This development process also resulted in the recommended regional express lane network identified in Connect SoCal and in the previously adopted 2016 RTP/SCS. SCAG recognizes that the network identified from this prior effort will continue to evolve as our respective partner agencies further study projects.
0001467.17	The 2020-2045 RTP/SCS should clearly state that the regional strategiessuggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.	Comment noted.

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0001467.18	Maps & other graphics- fonts need to be embedded in PDF to print properly.	Comment noted.
0001467.19	All tables, charts, graphics need to have sources and the document title.	Comment noted. SCAG will consider your recommendation wherever applicable.
0001467.20	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.	While SB 375 does not require addressing housing costs and homelessness, housing affordability is a factor shown to drive location choice which then impacts daily travel and related household greenhouse gas emissions. Additionally, this topic is relevant to the Connect SoCal Goal #9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001468 Related Documents Link</p>		
0001468.01	The growth forecast should be adopted at no lower than the jurisdictional level	The Growth Forecast Guiding Principles, found in the Demographics & Growth Forecast Technical Report indicate that the forecast will be adopted at the jurisdictional level, and not at any smaller levels.
0001468.02	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.	Comment noted. Your suggestion may be considered in future update cycle.
0001468.03	Add the following to the glossary; use definitions from PEIR -Households, Absolute constraints, Single-family, Multi-family, Constrained/strategic, Unconstrained plan	The requested terms have been added to the glossary.
0001468.04	pg. 61 What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region's 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.	Comment noted. A brief overview has been added to the "Linking Future Growth With More Transportation Choices" section of Chapter 2 and a more detailed discussion of 2016 RTP/SCS progress can be found in the Sustainable Communities Strategy Technical Report.
0001468.05	p. 2, column 2, paragraph 1 "...but also by bringing housing and jobs closer together, making commutes shorter and making it easier to get around without a car." [see redline in attachment pg. 13, #18]	Comment noted. Suggested edits will be incorporated in the Final Connect SoCal.
0001468.06	p.4, paragraph 3; All documents. PEIR ES-4, P2.0-10 PLAN p96, p113 Ensure revenue totals are consistent throughout all documents Expected revenues not consistently reflected in the Plan and PEIR. \$633.9 billion cf. \$638.6 billion	Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, and Chapter 10.0, Corrections and Additions, of the Final Connect SoCal PEIR.
0001468.07	p. 4, paragraph 1, last sentence. "We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces." Goals may conflict in coastal areas, e.g., San Clemente HQT. Clarify what the priority will be.	Connect SoCal is intended to provide a regional policy foundation that local governments may build upon and implement if they so choose. Local jurisdictions maintain local land use authority and discretion regarding priorities.

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0001468.08	p. 5; column 2; Connect SoCal. Plan Summary; Core Vision Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.	Suggested edits will be incorporated in the Final Connect SoCal.
0001468.09	p. 5; column 2; Connect SoCal. Plan Summary; Key Connections Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.	Suggested edits will be incorporated in the Final Connect SoCal.
0001468.10	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact - For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.	Comment noted. Suggested edits will be incorporated in the Final Connect SoCal.
0001468.11	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.	The performance results presented in the ‘Plan Benefits’ section of the ‘Connect SoCal Plan Summary’ will be reviewed to ensure consistency with the Final Performance Measures Technical Report.
0001468.12	p. 8; right column; Laws that guide the Plan; 1st bullet Verify that the reference be to U.S.C., as in United States Code.	Comment noted. Suggested edits will be incorporated in the Final Connect SoCal.
0001468.13	p. 10, column 2, paragraph 5 “The process was guided by the Connect SoCal Guidelines and Schedule...” [see redline edit #26 on pg. 14 of attachment]	Suggested edits will be incorporated in the Final Connect SoCal.
0001468.14	p. 11, column 1, paragraph 3 “This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.” Requested edits: “SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of regionally significant transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including applicable transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the list of programs and projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional initiatives that go beyond county-level commitments and are intended to address challenges that are uniquely regional in nature.” [see redline edit #27 on pg. 15 of attachment]	Comment noted. Suggested edits will be incorporated in the Final Connect SoCal.
0001468.15	p.11, column 1, paragraph 4; 5th line Replace “New Mobility” with “Mobility Innovations”	Comment noted. Suggested edits will be incorporated in the Final Connect SoCal.

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<i>Submitted by</i> Orange County Council of Governments		Submittal 0001468 Related Documents Link
0001468.16	p. 11, column 1, paragraph 4 "...SCAG's planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control." Define 'respecting local control'.	SCAG utilized feedback from jurisdictions and a broad range of stakeholders to develop the Growth Vision strategies and Forecasted Development Pattern for Connect SoCal. Local control is emphasized as forecasted growth at the jurisdictional level directly reflects input received from local jurisdictions. Further, in working to finalize the plan's Forecasted Development Pattern (a reflection of the Growth Vision's strategies and policies), SCAG initiated a peer review with local jurisdictions of population, household, and employment growth at the sub-jurisdictional level (i.e. transportation analysis zone (TAZ) level) prior to the release of the draft Connect SoCal. Focusing on jurisdictions individually, it was evident that many had visions for future development that were a better match with Connect SoCal's Growth Vision of regional policies and strategies. Accordingly, technical refinements were made to the Forecasted Development Pattern in Connect SoCal that included adjustments to growth due to entitlements and maximum planned capacities. "Locally envisioned growth" was used in some instances to further Connect SoCal's Growth Vision of reducing the need for residents to drive by locating housing, jobs and transit closer together - helping to assure that Connect SoCal's land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities. Additional information on the development and future use of the Growth Vision is available in the growth forecast Guiding Principles in the Demographics and Growth Forecast Technical Report.
0001468.17	p. 11, column 2, paragraph 2 "SCAG's 18 CBO partners represented constituents from..." In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation & Consultation Technical Report- state this as where to refer to.	Comment noted. Table 4 in the appendix of the Public Participation and Consultation Technical Report lists the CBOs and a description of each. More information can be found on page 6 of the report.
0001468.18	p. 11, column 2, paragraph 3 "Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies." [see redline edit #31 on pg.16 of attachment]	Comment noted. Suggested edits will be incorporated in the Final Connect SoCal.
0001468.19	p. 12, column 1, paragraph 3 "SCAG considered input gathered through the CBO engagement and public workshops..." [see redline edit #32 on pg.16 of attachment]	Comment noted. The edits have been made to text wherever applicable.
0001468.20	p. 13; column 2 Economic & Job Creation Analysis [see redline edit #33 on pg.16 of attachment]	Comment noted. Suggested edits will be incorporated in the Final Connect SoCal.
<i>Submitted by</i> Orange County Council of Governments		Submittal 0001469 Related Documents Link
0001469.01	p. 19, column 1, paragraph 2 "In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere." Delete as UBI is not under purview of SCAG or RTP. [see redline edit #34 on pg.16 of attachment]	UBI discussion reviewed. SCAG's long-range visioning necessitates discussions of trends related to income, workforce trends, and life outcomes thus discussion of UBI is merited. Language modified to reflect policy neutrality.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001469 Related Documents Link
0001469.02	p. 19; column 1; paragraph 3 Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.	Comment noted.
0001469.03	p. 21, column 2, paragraph 1 “There has been an acceleration in new units since the Great Recession that has been characterized by a higher share of multi-family units. For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production...” Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed. [see redline edit #36 on pg.17 of attachment]	Clarified. The referenced text relates to permitting, following the data in Figure 2.4.
0001469.04	p. 23, column 1, paragraph 2 “Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas.” Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.	Language used, and notes in associated table (2.1), updated to reflect the Sustainable Communities Strategy Technical Report’s definitions of priority and constraint areas (rather than vacant land).
0001469.05	p. 29, third bullet “Non-Hispanic Whites disproportionately use automobiles and bicycling modes...” Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional. Perhaps the sentence should say “Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes...”	Modified to better reflect data presented in Tables 2.2 and 2.3
0001469.06	p. 32, column 1, paragraph 3 “...environmental litigation, community resistance to all kinds of housing projects, and lack of sufficient local funding mechanisms.” Resistance is not limited to only higher-density housing projects.[see redline edit #39 on pg.17 of attachment]	Comment has been addressed in the Final Connect SoCal.
0001469.07	p. 32, column 2; paragraph 2 Add source for the economic benefits of new housing construction.	Comment has been addressed in the Final Connect SoCal.
0001469.08	p. 33, graphic “...environmental litigation, community resistance to all kinds of housing projects, and lack of sufficient local funding mechanisms and lack of sufficient state, federal, and local funding mechanisms.”[see redline edit #41 on pg.18 of attachment]	Comment has been addressed in the Final Connect SoCal.
0001469.09	p.36 Under “Farm Land Lost and At Risk”, SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of theCity of Irvine privately-owned land surrounding the former Marine AirStation El Toro was utilized for farming because no other uses werepermitted. Once El Toro was closed, the land was rezoned to permitresidential, but continued to be used as farmland for many years.Add note to table and section that “not all land used for farming waspermanent farmland and was not necessarily designated in the zoning code or general plan for farming.”	To ensure consistency across each county, SCAG uses data from the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP). This program releases agricultural inventories for each county on a biannual basis that track farm land acreage losses and gains. Per the FMMP website, data and maps are updated with a computer mapping system, aerial imagery, public review and field reconnaissance. The FMMP does not use zoning as a primary source for its data collection.

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001469 Related Documents Link
0001469.10	p. 39, graphic “If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma.” What about high capacity arterials like HQTAs or railines? Why are these not included?	Comment noted. The language is intended to function as an example, not a comprehensive list. The referenced graphic in the Plan has been updated to reflect the following language changes: "If a person lives in housing adjacent to a freeway or high traffic road, they may be more likely to develop asthma."
0001469.11	p. 41, column 1, paragraph 2 Provide reference to Congestion Management Technical Report.	A reference to the Congestion Management Technical Report will be added to Chapter 2 of the Final Connect SoCal.
0001469.12	p. 46, column 2, paragraph 2 “This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals set by the Regional Council.”[see redline edit #45 on pg.18 of attachment]	Comment noted. Suggested edits will be considered in the Final Connect SoCal.
0001469.13	p. 58 column 1, paragraph 2 RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?	A Regional Advance Mitigation Program for the SCAG region is currently in its proposal stage. SCAG intends to collaborate with local and state agencies to determine an appropriate design and funding structure for this program.
0001469.14	p. 48, column 2, paragraph 3 “...Connect SoCal can reach the regional target of reducing greenhousegases...”[see redline edit #47 on pg.18 of attachment]	The edit has been made to the referenced text.
0001469.15	p. 49, column 1, bullet 2 “Focus on a regional jobs/housing balance to reduce commute times and distances and ...” [see redline edit #48 on pg.19 of attachment]	Comment noted. The edit has been made to the referenced text.
0001469.16	p. 49, column 2, fifth bullet “Support statewide legislation that reduces barriers to new construction...” Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”	Comment noted. This need for funding has been reflected in an edit to the bullet above "Identify funding opportunities for new workforce and affordable housing development".
0001469.17	p. 50, column 1, paragraph 1 “Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” where applicable and feasible.” [see redline edit #50 on pg.19 of attachment]	The edit has been made to the referenced text.
0001469.18	p. 50, column 2, paragraph 4 “Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.” [see redline edit #51 on pg.19 of attachment]	Comment noted. The referenced text has been revised.
0001469.19	p. 55, column 1, first sentence “... in areas subject to future two-foot sea level rise.” Cite the source used. Indicate where map is showing sea level rise and HQTAs.	Comment noted. The referenced text has been updated.
0001469.20	p. 56, paragraph 1 “The Regional Housing Supportive Infrastructure strategy will help make it quicker for developers local jurisdictions to produce critically-needed housing.” Local jurisdictions don’t build housing. [see redline edit #53 on pg.19 of attachment]	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001475 Related Documents Link
0001475.01	p. 59; column 1; paragraph 1; last sentence It would be appropriate to include investment in regionally significant local streets and roads here too.	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001475.02	p. 59; column 2; paragraph 3 “The Plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 billion towards preservation, operation and resiliency needs of the regionally significant local streets and roads. [see redline comment #55 on pg.20 of attachment]	Comment noted.
0001475.03	p. 60, column 2, paragraph 3 p. 62 Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.	Go Zones are locally-designated geographic areas where a suite of mobility service options are provided together with incentives to reduce dependency on personal automobiles.
0001475.04	General Comment, p.61, 102 “A mileage-based system.” For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.	Comment noted.
0001475.05	p. 64, column 1, paragraph 1 “Connect SoCal identified \$7.3 billion through 2045 to implement TDM strategies throughout the region.” [see redline edit #58 on pg.20 of attachment]	We will reword the referenced sentence per your comment.
0001475.06	p.64, column 1, paragraph 3 Revised to clarify that TSM is more than ITS.	Chapter 3 of the Final Connect SoCal will be revised per the comment.
0001475.07	p. 71, column 1, paragraph 3, last sentence Communities are excited about changing our streets. We need support in the form of funding to do so.	SCAG recognizes the need for increased funding for active transportation projects and will continue to support member jurisdiction applications for grant funding. Additionally, SCAG supports efforts to increase funding for active transportation projects at the local, state, and federal levels. Current available funding sources can be found in Appendix 6 of the Active Transportation Technical Report.
0001475.08	p. 71, column 2, paragraph 4 “Planning for 2045...grant funds for regionally significant projects.” Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.	SCAG recognizes the need for increased funding for active transportation projects and will continue to support member jurisdiction applications for grant funding. Additionally, SCAG supports efforts to increase funding for active transportation projects at the local, state, and federal levels. Current available funding sources can be found in Appendix 6 of the Active Transportation Technical Report.
0001475.09	p. 73; column 2; paragraph 2 “auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT” Toll lanes are not mentioned on either table or exhibit referenced.	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001475.10	p. 74, column; paragraph 1 “believes merits future consideration for potential inclusion in the financially constrained”[see redline edit #63 on pg.20 of attachment]	Comment noted.
0001475.11	p.74; column 2 “the I-105 in Los Angeles County...” [see redline edit #64 on pg.20 of attachment]	Comment noted. Suggested changes will be made in the Final Connect SoCal.
0001475.12	P. 84 Under the Right Tool for the Job, first paragraph. The rise of shared mobility and mobility as a service will allow residents to choose how to travel... [see redline edit #65 on pg.21 of attachment]	The text will be revised per your comment.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001475 Related Documents Link
0001475.13	p. 83, column 1, paragraph 3 “Project level mitigation measures have been identified that “can and should where applicable and feasible” be undertaken by lead agencies that implement transportation projects...”[see redline edit #66 on pg.21 of attachment]	Suggested changes will be considered in the Final Connect SoCal.
0001475.14	Exhibit 3.4, Exhibit 3.6 Verify the location of job centers on these figures as it does not appear to match.	Comment noted. The referenced exhibits have been updated.
0001475.15	Exhibit 3.4, Exhibit 3.5 Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.	Comment noted. Please see the Environmental Justice Technical Report for a Sea Level Rise map.
0001475.16	Exhibit 3.4, Exhibit 3.5 Growth constraints should include historic resources listed on (at least) state and federal lists.	The growth constraints included in Connect SoCal are intended to be regional guidelines and do not supersede existing regulations or protections such as those provided to districts, sites or buildings included on local, state or federal historic resources lists.
0001475.17	p. 107, Table 4.4 first row Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that:- Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and - There is little to no infrastructure to support alternative modes of transportation.	Comment noted.
0001475.18	p. 107, Table 4.4 second row Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.	Comment noted.
0001475.19	p. 108, Table 4.5.1 first row “Locally imposed ½ percent sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two ½ percent sales taxes)...”[see redline edit #72 on pg.21 of attachment]	Comment noted.
0001475.20	p. 108, Table 4.5.1 second row “The Local Transportation Fund (LTF) is derived from a ¼ percent sales tax on ...”[see redline edit #73 on pg.21 of attachment]	Comment noted.
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001476 Related Documents Link
0001476.01	p. 108, Table 4.5.1 fourth row Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.	Comment noted.
0001476.02	P. 108, Table 4.5 fifth row Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.	SCAG reviews historical data and incorporates revenue forecasts provided by administering agencies.
0001476.03	p. 111, Table 4.5.4 second row Indicate if the mileage-based user fee would be inflation adjusted.	SCAG will update the referenced table to clarify that the mileage-based user fee would be adjusted for inflation.
0001476.04	p. 114, Table 4.6.2 row 9 Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion. This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”	We have incorporated your suggestion.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001476 Related Documents Link
0001476.05	p. 118, column 1, paragraph 3 "...that comprise the SCAG region. With the Plan, trips to work, schools and other... [see redline edit #78 on pg.22 of attachment]	Suggested language edit will be incorporated into the Final Connect SoCal.
0001476.06	p. 118, column 2, bullet 7 "... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth." [see redline edit #79 on pg.22 of attachment]	Suggested edit will be reviewed and incorporated into the Final Connect SoCal, as determined to be appropriate within the context of the referenced paragraph.
0001476.07	p. 120, bullet 2 Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.	The definition of 'Baseline' provided in the Performance Measures Technical Report will be reviewed to ensure consistency with the Glossary.
0001476.08	p.121 Replace "Trend" with "Baseline".	The use of the labels 'Trend' and 'Baseline' in the context of the performance profile graphic featured in the Performance Measures Technical Report will be reviewed to ensure consistency with other similar graphics used in the Final Connect SoCal.
0001476.09	p.122 Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.	We will review the content of the note provided in support of the 'Connect SoCal Performance Results' graphic to ensure consistency with the Glossary.
0001476.10	p. 123, last 2 trends Correct trend arrows in the last two rows.	Thank you for your comment on Table 5.1 of the draft Connect SoCal. The trend arrows on the last two rows of the table will be reversed in accordance with your comment.
0001476.11	p.124, Table 5.1 For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?	The development of performance measures to track regional active transportation network connectivity would be a very valuable addition to the set of metrics used to evaluate the RTP/SCS. While reliably accurate resources to monitor this variable over time are not readily available at this time, SCAG will continue working with our regional active transportation stakeholders on the identification of emergent data resources for effectively monitoring our active transportation network.
0001476.12	p.124, Table 5.1 For Travel time distribution by mode, the Definition should include "(work trips)" because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.	The 'Definition' information presented in Table 5.1 for the 'Travel Time Distribution by Mode' performance measures will be updated to clarify that the metrics refer specifically to work trips. The performance results presented in the table for HOV trips will be reviewed to ensure consistency with the Final Performance Measures Technical Report.
0001476.13	p. 125, Table 5.1 Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.	Thank you for your comment in reference to Table 5.1 of the draft Connect SoCal Performance Measures Technical Report. The error identified in your comment will be corrected in the final version of the report.
0001476.14	p. 125, Table 5.1 For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.	The decimal point associated with the cardiovascular disease rate presented in Table 5.1 will be updated and the trend will be adjusted accordingly.
0001476.15	p. 125, Table 5.1 Connect SoCal 2045 Performance Results for active transportation modeshare for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.	The performance results presented in Table 5.1 for walk share and bike share will be reviewed to ensure consistency with other sections.

ID	Comment	Response
<i>Submitted by</i> Orange County Council of Governments		Submittal 0001476 Related Documents Link
0001476.16	p. 126, Table 5.1 Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.	The asterisks used in reference to Table 5.1 will be updated accordingly.
0001476.17	p. 126, Table 5.1 For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?	The objectives presented in Table 5.1 for the two Economic Opportunity performance measures will be updated to remove the reference to base year comparison.
0001476.18	p. 127, Table 5.1 Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?	While Connect SoCal does not currently calculate benefit/cost ratios by modal category, an overall transportation system investment benefit/cost analysis is conducted as one of the Connect SoCal scenario performance measures. We agree with your observation that benefit/cost assessment by mode would provide a useful metric, and this option may be evaluated for future application, pending availability of appropriate data and resources.
0001476.19	p. 131, Figure 5.3 Title appears to be missing “, Thousands”.	The title for Figure 5.3 will be updated accordingly.
0001476.20	p. 132, column 1, paragraph 1 Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.	The performance results presented in the draft Connect SoCal ‘Measuring Our Progress’ chapter for mean commute time by mode will be reviewed to ensure consistency with other sections.
<i>Submitted by</i> Orange County Council of Governments		Submittal 0001479 Related Documents Link
0001479.01	p. 133, column 2, paragraph 2 The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.	The public health performance results presented in the Final Connect SoCal ‘Measuring Our Progress’ chapter will be reviewed to ensure consistency with the Public Health Technical Report.
0001479.02	p. 134, column 1, paragraph 3 Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.	The paragraph referenced in your comment will be reviewed in the context of your observation regarding the regional economic impact of the health care cost savings due to Connect SoCal investments.
0001479.03	p. 135, column 1, paragraph 3 Suggest replacing “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.	The total O&M investment value will be revised in the report to \$316 billion. The reference to the Transportation Safety & Security Technical Report will be replaced by a reference to the ‘Paying Our Way Forward’ chapter of the Final Connect SoCal.
0001479.04	p. 135, column 2, paragraph 2 “Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.” [see redline edit #97 on pg.24 of attachment]	Your requested revision will be reviewed and incorporated into the Final Connect SoCal as appropriate.
0001479.05	p. 136, Table 5.3, row 1 Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.	Your suggestion for adding an explanatory note in reference to Table 5.3 will be incorporated into the Final Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001479 Related Documents Link
0001479.06	p. 141, column 2, paragraph 2 Accessibility to Parks & Schools:“SCAG’s accessibility analysis seeks to determine how the Plan improves residents’ ability to access parks within a designated travel time and distance. See Environmental Justice Technical Report for detailed analysis on accessibility.” Some state parks are served by transit e.g., Crystal Cove. Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above. [see redline edit #99 on pg.24 of attachment]	Your suggested edit will be included in the Final Connect SoCal. Regarding the selection of the San Gabriel National Monument for the Environmental Justice accessibility analysis, this assessment was completed as part of a separate study in collaboration with the United States Forest Service. Due to its relevance to the topic, it provides a useful example of the open space accessibility issues experienced throughout the SCAG region. While some open space areas in the region are easily accessible by public transportation, others, including the San Gabriel National Monument, are not.
0001479.07	p.141, column 2, paragraph 2 “Accessibility parks and schools”- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn’t protected or valid excuse accepted by HCD as land/reason for not rezoning	Connect SoCal prioritizes the allocation of new residential development in infill and other centrally located, transit-oriented locations. The preservation of open space and other rural, undeveloped areas is a featured goal of Connect SoCal.
0001479.08	p. 142, column 2, item 9 Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.“It also includes one of the country’s most extensive HOV systems and a growing network HOT lanes. [see redline edit #101 on pg.25 of attachment]	The values presented for centerline miles and lane miles in the Performance Measures Technical Report will be reviewed to ensure consistency with other sections of Connect SoCal.
0001479.09	p. 143, column 1, item 15 “Sales and gasoline taxes, which are currently the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.” [see redline edit #102 on pg.25 of attachment]	We will review your suggested edit and incorporate into the Final Connect SoCal as appropriate.
0001479.10	p. 143, column 2, item 16 “The strategies that public agencies pursue to invest in transportation systems presents a potential substantial impact on EJ. [see redline edit #103 on pg.25 of attachment]	We will review your suggested edit and incorporate into the Final Connect SoCal as appropriate.
0001479.11	p. 143, column 2, item 18 This should be updated to also account for the local road charge program.	Your suggested edit will be reviewed for consistency with the Final Environmental Justice Technical Report.
0001479.12	p. 144, paragraph 4, first sentence. “The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions.” Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . . Who are the ‘constituent communities’?	The referenced paragraph in the Performance Measures Technical Report provides a high level summary of the objectives of Connect SoCal in regard to transforming our regional transportation system and associated land use context to support a more sustainable and economically robust region. The development of Connect SoCal included an extensive public outreach element and intensive collaboration with the jurisdictions and counties that comprise the SCAG region. The vision and path forward promoted through Connect SoCal is the result of these inclusive efforts. In the context of this paragraph, ‘constituent communities’ refers specifically to the many unincorporated communities with the SCAG region.
0001479.13	p. 147, Table 5.4, last row This should be updated to also account for the local road charge program.	Your suggested edit will be reviewed for consistency with the Final Environmental Justice Technical Report.
0001479.14	p. 151, column 1, paragraph 3 “These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies.” What is the Regional Housing Strategy Framework? How much money will be provided to jurisdictions? Will the funding distribution methodology be consistent with the RHNA distribution methodology?	The Regional Housing Strategy Framework has not yet been developed so specific details are forthcoming. Generally, the Framework will help to steer the resources provided through Assembly Bill 101.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001479 Related Documents Link</p>		
0001479.15	p. 163, glossary“Measure A Revenues generated from Riverside County’s local half percent sales tax. Measure D Revenues generated from Imperial County’s local half percent sales tax. Measure I Revenues generated from San Bernardino County’s local half percent sales tax. Measure M Revenues generated from Orange County’s local half percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018. Measure R Revenues generated from Los Angeles County’s local half percent sales tax. ...” [see redline edit #108 on pg.26 of attachment]	Comment noted.
0001479.16	p. 166, glossary“Proposition A Revenues generated from Los Angeles County’s localhalf-percent sales tax. ... Proposition C Revenues generated from Los Angeles County’s local half percent sales tax. ...”[see redline edit #109 on pg.26 of attachment]	Comment noted.
0001479.17	p. 173, glossary “VMT Vehicle Miles Traveled – On highways , a measurement of thetotal miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.” Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.	Comment noted. Edits for clarification will be incorporated into the Final Connect SoCal.
0001479.18	p. 177, Economic & Job Creation Analysis [see redline edit #111 on pg.26 of attachment]	Comment noted.
0001479.19	PEIR COMMENTS Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001479.20	ES-4 Second bullet. Details a regional transportation investment given \$638.6 billion in expected revenues from federal, state, regional and localsources over the next 25 years; and ... [see edit on PEIR Comment #2 on pg.27 of attachment]	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001480 Related Documents Link</p>		
0001480.01	ES-10, bullet 3 “Establish a mileage-based user fee to replace the gas tax and to generate a funding source for aging infrastructure and construction of other travel options”	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.02	ES-11 Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction.“Projects include interchange improvements, auxiliary lanes, generalpurpose lanes, carpool lanes, toll roads, toll lanes and Express/HOT lanes.”	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.03	PEIR p.2.0-23-25 AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions’ planning/zoning regs.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001480 Related Documents Link
0001480.04	PEIR p.2.0-20 PMM AES-3 (b). Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions' codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.05	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23) "Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.06	PEIR p.2.0-24 PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.07	PEIR p.2.0-25 PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.08	PEIR p.2.0-25 BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.09	ES-5 Table Impact AQ-4 (pages 2.0-25) "Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.10	Table ES-5 p. 2.0-26 "PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.11	Table ES-5 p. 2.0-27 "PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.12	Table ES-5 p. 2.0-29 "PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency."	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001480 Related Documents Link
0001480.13	PEIR p.2.0-29 PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.14	Table ES-5 p. 2.0-30 "PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.15	PEIR p. 2.0-31 Congestion Pricing. Connect SoCal identified three congestion pricing strategies, two of which were incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.16	Table ES-5 p. 2.0-32 "PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency."	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.17	Table ES-5 p. 2.0-33 "PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.18	Table ES-5 p. 2.0-34 "PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.19	PEIR p. 2.0-35 Highway and Arterial Network. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes and Express/HOT lanes.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001480.20	Table ES-5 p. 2.0-36 "PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001482 Related Documents Link
0001482.01	Table ES-5 p. 2.0-37“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a projectcan and should consider mitigation measures to reduce substantialadverse effects related to historical resources, where applicable and feasible. Such measures may include the following or other comparabileasures identified by the Lead Agency:”	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.02	ES-5 Table Geology and Soils Impact GEO-1 (pages 2.0-37) “Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that projectspecific measures would be included as applicable and feasible.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.03	ES-5 Table Geology and Soils Impact GEO-3 (pages 2.0-38) “Less than Significant” impact conclusions should be re-evaluated tosubstantiate the conclusion of less than significant with no mitigationmeasures needed and/or consider changing the impact conclusion toinclude mitigation measures and include language to note that projectspecific measures would be included as applicable and feasible.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.04	ES-5 Table Geology and Soils Impact GEO-4 (pages 2.0-38) “Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigationmeasures needed and/or consider changing the impact conclusion toinclude mitigation measures and include language to note that projectspecific measures would be included as applicable and feasible.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.05	ES-5 Table Geology and Soils Impact GEO-5 (pages 2.0-38) “Less than Significant” impact conclusions should be re-evaluated tosubstantiate the conclusion of less than significant with no mitigationmeasures needed and/or consider changing the impact conclusion toinclude mitigation measures and include language to note that projectspecific measures would be included as applicable and feasible.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.06	Table ES-5 p. 2.0-39 “PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:”	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.07	Table ES-5 p. 2.0-39 “PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a projectcan and should consider mitigation measures to reduce substantialadverse effects related to greenhouse gas emissions, where applicableand feasible. Such measures may include the following or othercomparable measures identified by the Lead Agency:”	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.08	Table ES-5 p. 2.0-57 “PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:”	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001482 Related Documents Link
0001482.09	Table ES-5 p. 2.0-64 "PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.10	Table ES-5 p. 2.0-66 "PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, where applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:"	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.11	PEIR 1.0-4, paragraph 3 "... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..." All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.12	PEIR 3.11-12, paragraph 1 "City and county general plans must be consistent with each other." This statement is not accurate. Delete.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001482 Related Documents Link
0001482.13	<p>PEIR 3.11-32, paragraph 1 “Regional Housing Needs Assessment...The California Department of Housing and Community Development(HCD), in consultation with each council of governments, determines each region’s existing and projected housing need.35 HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the region’s housing need.36 HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.37 SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by theDepartment of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001482.14	<p>PEIR 3.11-32, paragraph 4 “The purpose of the housing element is to identify the community’s housing needs, as determined by the RHNA process, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to mehttp://connectsocial-auth/Pages/Connect-SoCal-Comment-System.aspx#addcommentset those needs.”</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001482 Related Documents Link
0001482.15	<p>3.11-32, paragraph 4 & 3.14-14, paragraph 2 3.11-39, paragraph 23.14-16, footnote 23 3.14-22, paragraph 4 [See attachment for reference text] In this context, does ‘allocation’ refer to the jurisdictional numbercalculated through the disaggregation of the regional total to thejurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total? Does a jurisdiction have to site and zone for housing consistent with the Plan? If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total? Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6th cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA housing forecast scenario is a reasonable alternative that should be evaluated in the PEIR.If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, isn’t the RHNA jurisdictional forecast a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing. The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001482.16	<p>PEIR 3.11-33, paragraph 3 3.14-14 (paragraph 4) “The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address existing need at theregional level, which is disaggregated and prescribed to areas asdetermined by SCAG, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment.” “The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, andfacilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2). In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001482 Related Documents Link
0001482.17	PEIR 3.11-33, paragraph 3 "...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. 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."	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.18	PEIR 3.14-13, paragraph 3 "Regional Housing Needs Assessment... HCD's determination is based on population projected produced by the Department of Finance and regional population forecasts used inpreparing regional transportation plans.15 SB 375 requires thedetermination to be based upon population projections by theDepartment of Finance and regional population forecasts used inpreparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG's total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG's population projections."	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001482.19	PEIR 3.14-15 (paragraph 2) "Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period." Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i> Orange County Council of Governments Submittal 0001482 Related Documents Link		
0001482.20	<p>PEIR 3.14-16 (paragraph 1) “The SCS must accommodate the projected need portion of the 6th cycle RHNA.” Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...” “While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.” This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<i>Submitted by</i> Orange County Council of Governments Submittal 0001484 Related Documents Link		
0001484.01	<p>PEIR Page 3.11-32, First Paragraph, Last Sentence “HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.” Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts; however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001484.02	<p>PEIR 3.11-33 (paragraph 2), Last Sentence “The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2)). In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001484.03	<p>PEIR 3.11-33 (paragraph 4) Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001484 Related Documents Link
0001484.04	PEIR 3.11-33 (last paragraph, last sentence) “Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.” Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001484.05	PEIR p. 3-20-6-7 The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001484.06	p. 42; Figure 27 Suggest replicating figure from cited source as this graphic does not convey the message as effectively.	Thank you for your comment. Figure 27 will be adjusted for better legibility.
0001484.07	p. 44; column 2; current bikeway network; 1st sentence This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.	Thank you for your comment. Sentence has been rewritten to address concern.
0001484.08	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.	Table 7 has been updated to reflect corrected funding totals.
0001484.09	p. 57; column 2; Table 8; 2045 Connect SoCal average commute timewalking Verify figure as it does not appear to consistent with the Public Health Technical Report.	Table has been updated for consistency with Main Book and other Technical Reports.
0001484.10	p. 58; column 2; Table 9 Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.	Figures in Table 9 will be updated for consistency with main book and Performance Measures Technical Report.
0001484.11	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet Is this an example or the regional standard?	This is an example. While it is useful the Mobility Data Standard (MDS) is not without its challenges, and would not be recommended as a regional standard until more vetting.
0001484.12	p. 65; Table 10; Total Check the math or include note that it does not sum to the total due to rounding.	Note will be added to table regarding rounding math.
0001484.13	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet Why only Caltrans?	Comment noted. Text will be revised to refer to county transportation commissions and local jurisdictions.
0001484.14	p. 68; column 1; Strategic Plan; 1st paragraph Suggested edit:Connect SoCal contains approximately \$22.5 billion (in nominal dollars)in investments in active transportation between 2020 and 2045.However, this represents only a portion of the need, based uponreasonably available funding.	The Connect SoCal cost assumptions include an assumed rate of inflation, so the total is not in nominal dollars. Text has been edited for clarity.
0001484.15	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence Clarify if this is in addition to the \$22.5 billion included in the constrained plan.	Clarification has been added to this sentence that the \$28 billion is a total cost, not in addition to the constrained Plan.
0001484.16	Clarify if this is in addition to the \$22.5 billion included in theconstrained plan. Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.	Clarification has been added to this sentence that the \$28 billion is a total cost, not in addition to the constrained Plan. Technical Report has been updated for consistency with Main Book and other Technical Reports.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001484 Related Documents Link</p>		
0001484.17	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence Suggest revising this statement so that it is clear that the Plan is financially constrained.	Statement has been revised for clarity.
0001484.18	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.	Comment noted. "Connect SoCal" is a specific reference to the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, and not a reference to prior RTP/SCS or RTP/SCS in general. Thus, following the initial reference to "2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)(Connect SoCal)" in the executive summary, all references to 2020-2045 RTP/SCS will be changed to "Connect SoCal." However, references to a past RTP/SCS and general references to an RTP/SCS, will remain "RTP/SCS."
0001484.19	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.	Commented noted. All references to "JWA" will be changed to "SNA" throughout the technical report.
0001484.20	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.	Comment noted. The title for the subsection "Commercial Service Airport in the SCAG Region (FAA Code)" indicates that the airports will be abbreviated using the FAA code/designation. In order to avoid confusion, all references to "JWA" will be changed to "SNA" throughout the technical report.
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001485 Related Documents Link</p>		
0001485.01	pg. 7 Ontario International Airport has a FAA designation of ONT not LAX	Comment noted. "Ontario International Airport (LAX)" will be corrected to reflect "Ontario International Airport (ONT)".
0001485.02	p. 8; left column; Ontario International Airport (LAX); 2nd paragraph; last sentence Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...	Comment noted. "Ontario International Airport (LAX)" will be corrected to reflect "Ontario International Airport (ONT)." A period will be placed after "7 MAP" on page 7, the last paragraph in the right column, and page 8, the first full paragraph on the left column. The sentence, "As for air cargo, Ontario..." will be completed to read "As for air cargo, Ontario Airport air cargo activity has been steadily increasing since the housing crisis of 2008, reaching 654,000 tons in 2017."
0001485.03	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.	Comment noted. As referenced in the subsection "Base Year, Estimated Growth Rate, And Horizon Year 2020-2040 (please note the 2040 will be changed to 2045) RTP/SCS", "The base year for the 2016-2040 RTP/SCS aviation demand forecast, conducted by AECOM, was 2013. Thus, the base year for the Connect SoCal demand forecast was moved forward by four years to 2017. Furthermore, 2017 was the most recent year available with complete airport passenger activity data. Although the base year for most of the analyses for Connect SoCal is 2016, 2017 empirically made the most sense for the Aviation Element."
0001485.04	pg. 10 Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.	Comment noted. The current text in "destinations" for Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada Rouge, and Air China, will be removed and replaced with actual destinations.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001485 Related Documents Link
0001485.05	pg. 10 Air Canada is duplicated in the table.	Comment noted. Table 1 “Commercial Air Carriers (and Destinations) Operating in the SCAG Region Airports” on page 10 will be updated to remove the redundant row/entry where Air Canada is listed twice.
0001485.06	pg. 23 Change the date to 2045 in the title. Connect SoCal is 2020-2045 not2020-2040.	Comment noted. “2020-2040 RTP/SCS” will be replaced with “2020-2045 RTP/SCS” in the title on page 23.
0001485.07	pg. 23 Under the title “SCAG REGION AIR CARGO FORECASTS” correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.	Comment noted. “2020-2040 RTP/SCS” will be replaced with “2020-2045 RTP/SCS” on page 23.
0001485.08	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)	Acronyms are spelled out on first use. The Congestion Management Technical Report will be edited per the comment.
0001485.09	P2, column 2, Figure 1 Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.	Comment noted. The pyramid provides a framework for improving and optimizing the transportation system, built upon a foundation of monitoring, evaluation and system preservation.
0001485.10	p. 6; column 1; Roles and responsibilities of partner agencies; 1st paragraph Replace “SGAG” with “SCAG”	Page 6 of the Congestion Management Technical Report will be edited per the comment.
0001485.11	P11, column 2, last paragraph suggest revising the sentence to read, FIGURE 2 and TABLE 2 depict the vehicle hours of delay....	Page 11 of the Congestion Management Technical Report will be edited per the comment.
0001485.12	P11, column 2, last paragraph suggest revising the sentence to read,However, yearly data shows that congestion has been increasing year over year since 2011, and this includes the three Caltrans districts in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)	Page 11 of the Congestion Management Technical Report will be edited per the comment.
0001485.13	P13, column 2, paragraph 1 FIGURE 3 depicts lost lane-miles... - Revise the second sentence to show the following: “In 2016, theSCAG region lost an equivalent of 998.79 or 999...” Figure 3 shows a total of 998.79.	Page 13 of the Congestion Management Technical Report will be edited per the comment.
0001485.14	pg 14 Suggest adding INTRO TEXT to EXHIBIT 1 and TABLE 3 -Top 100Bottlenecks..	Page 14 of the Congestion Management Technical Report will be edited per the comment.
0001485.15	p. 22; left column; Regional and county congestion trends Add references to Exhibit 1 and Table 3	Page 22 of the Congestion Management Technical Report will be edited per the comment.
0001485.16	P23, column 1, paragraph 2 Add reference to FIGURE 4 at the end of the first sentence.	Page 23 of the Congestion Management Technical Report will be edited per the comment.
0001485.17	pg. 23 The non-recurrent congestion discussion and Figure 4 (recurrent/nonrecurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the Performance Measures Technical Report. Please reconcile.	The non-recurrent/recurrent discussion and statistics between the Congestion Management and Performance Measures Technical Reports will be revised to be consistent.
0001485.18	Pg 24, column 2, Paragraph 2 In the second sentence identify a list of stakeholders that were contacted.	Comment noted. As the CSMPs were developed by Caltrans, please contact the appropriate Caltrans District to request a list of stakeholders.

ID	Comment	Response
<i>Submitted by</i> Orange County Council of Governments		
		Submittal 0001485 Related Documents Link
0001485.19	p. 23; column 1; Non-recurrent congestion; 2nd paragraph; 5th sentence Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.	We will review the data depicted in Figure 4 and update Page 23 of the Congestion Management Technical Report as appropriate.
0001485.20	Pg 29, column 1, last paragraph The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including planned events and emergencies.	Comment noted.
<i>Submitted by</i> Orange County Council of Governments		
		Submittal 0001486 Related Documents Link
0001486.01	p. 31; column 2; SCAG's role; 3rd paragraph; 1st sentence Suggested edit:One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect- IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles County.	Page 31 of the Congestion Management Technical Report will be edited per the comment.
0001486.02	P33 ff., TABLE 4 Timeframe, Short and Long-term need to be defined	Comment noted. The timeframe will be specified per your comment.
0001486.03	Pg 39, Column 2, paragraph 2. Revise bullet point one to say "...supportive policies for shared ride services, such as transportation Network Companies (TNCs)" Add a sentence suggesting that TNC's can contribute to SOV trips when TNC vehicles are driving around looking for customers	Comment noted. SCAG recognizes that TNCs can contribute to SOV trips due to deadheading, therefore the recommendation emphasizes reduction of SOV trips through shared rides to/from transit.
0001486.04	p. 41; column 1; Ridesharing Replace "ExpressLane" with "express lane""ExpressLane" is a Metro branding of the generic express lane.	Page 41 of the Congestion Management Technical Report will be edited per the comment.
0001486.05	41; column 2; Carpooling and vanpooling Carpooling is commonly defined as when two or more people share a ride...	Comment noted. Page 41 of the Congestion Management Technical Report will be edited per the comment.
0001486.06	pg. 45 LAND USE. First paragraph. Why are there question marks on the years in, "Forecasts for the 2017? through 2025? planning years..."	Page 45 of the Congestion Management Technical Report will be edited per the comment.
0001486.07	pg 45 LAND USE. Define small area levels in "The baseline growth forecast provides the basis for developing the land use assumptions at the regional and small area levels which build 2020 Connect SoCal PlanAlternative."	Comment noted. Discussion of the growth forecast process is included in the Demographics & Growth Forecast Technical Report.
0001486.08	p. 47; column 2; New infrastructure Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace "appendices" with "technical reports"	Page 47 of the Congestion Management Technical Report will be edited per the comment.
0001486.09	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.	Thank you for your comments. Staff will consider improvement of map templates.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001486 Related Documents Link
0001486.10	All maps with growth forecast and development types data Add: "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."	Connect SoCal will be adopted at the jurisdictional level, and TAZ level data or any data at a geography smaller than the jurisdictional level has been utilized to conduct required modeling analyses and is therefore advisory only and non-binding, as described in the Guiding Principles for the growth forecast in the Demographics and Growth Forecast Technical Report.
0001486.11	p. 2; column 1; last paragraph; last sentences Replace "Economic Growth" with "Economic and Job Creation Analysis"	Referenced revision addressed.
0001486.12	pg. 4; left column; Forecasting process overview; 2nd paragraph Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November 2019.	The Final Connect SoCal will be updated per comment.
0001486.13	p. 7; Table 3 Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.	The Environmental Justice (EJ) Technical Report uses 5-year American Community Survey (ACS) values aggregated from census tracts to facilitate side-by-side comparisons with various EJ geographies, whereas the Demographics & Growth Forecast Technical Report uses forecast model output. A note clarifying the difference is being added to the EJ report.
0001486.14	p. 18; Special focus: workplace automation and the gig economy It may be appropriate to address the implications of AB 5 here.	While a comprehensive analysis of drivers and impacts is beyond the scope of this report, a brief reference and discussion of AB 5 has been added.
0001486.15	p. 28; Figure 11 Verify that this is labeled correctly	Verified.
0001486.16	p. 29; Table 13; Population Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.	The Environmental Justice (EJ) Technical Report uses 5-year American Community Survey (ACS) values aggregated from census tracts to facilitate side-by-side comparisons with various EJ geographies, whereas the Demographics & Growth Forecast Technical Report uses forecast model output. A note clarifying the difference is being added to the EJ report.
0001486.17	P. 42; Table 15 Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.	Priority growth area definitions have been verified and updated to ensure consistency with other sections of Connect SoCal.
0001486.18	p. 1; column 1; last paragraph Suggested edit: Over the FY2020-21 through FY2024-45 period, our region is expected to invest more than \$603...	The suggested edit is addressed in the Final Connect SoCal.
0001486.19	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1st paragraph; 2nd sentence Replace "Los Angeles region" with "SCAG region"	The suggested edit is addressed in the Final Connect SoCal.
0001486.20	p. 9; Table 1 Missing fiscal year notation	The edit is addressed in the Final Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001488 Related Documents Link
0001488.01	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1st line Replace “2021-2025” with “FY2020-21 through FY2024-25”	The suggested edit is addressed in the Final Connect SoCal.
0001488.02	p. 10; Table 2 p. 11; Table 3 Missing fiscal year notation	The suggested edit is addressed in the Final Connect SoCal.
0001488.03	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1st paragraph Replace “2021-2045” with “FY2020-21 through FY2044-45”	Change made in the Final Connect SoCal.
0001488.04	p. 12; Table 4 Missing fiscal year notation	Change made in the Final Connect SoCal.
0001488.05	p. 12; column 1; Conclusion Replace “2021-2045” with “FY2020-21 through FY2044-45”	Change made in the Final Connect SoCal.
0001488.06	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.	Thank you for your comment. It has been noted.
0001488.07	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.	Comment noted.
0001488.08	Pg. 7 The narrative includes the following statement: “Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation.” Citation should be included for the “user surveys” referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.	A citation will be added, per your comment.
0001488.09	pg. 7 Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?	Your comments will be addressed in the Final Connect SoCal.
0001488.10	p. 8; column 2; Ridehailing/transportation network companies (TNCs) It may be appropriate to address the implications of AB 5 here. How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.	At the time the draft plan was written, AB 5 had not yet gone into effect, and at the time of responding to Connect SoCal comments, its effects are not yet known. Certainly it will impact TNCs and their drivers, but it would be difficult to predict its effects on the gig worker sector.
0001488.11	pg. 11 The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don’t hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn’t this section technology neutral if there are identical or very similar outcomes.	While we are excited that there are many types of alternative fuel technologies on the market, vehicle electrification is provided as one example, reflecting what we hear about most from our stakeholders and the general public. The purpose of the Emerging Technology Technical Report is to set forth policy frameworks and implementation ideas relating to the technologies that our member agencies and the public are most likely to be faced with. For future planning efforts we can consider preparing a more exhaustive list of all alternative fuel technologies.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001488 Related Documents Link
0001488.12	pg. 12 “Decline in Collisions and Deaths from Connected and Automated Features”. Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state “Potential Decline in Collisions and Deaths...”	Thank you for pointing this out. The title will be changed, per your comment.
0001488.13	pg. 14 Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.	This section of the report is specific to the vehicle electrification strategy, and is not intended to be an exhaustive review of all alternative fuel technologies.
0001488.14	pg. 15 Under “Existing Conditions: Alternative Fuel Vehicles” – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.	While the report does discuss other forms of alternative fuel vehicles, this section notes that the greatest opportunities for the SCAG region are the increase in electric vehicle sales and the broad increase in the number of different electric vehicles and plug-in hybrid electric vehicles available to the consumer.
0001488.15	pg. 22 Focus on Vehicle Electrification is not technology neutral.	While we are excited that there are many types of alternative fuel technologies on the market, vehicle electrification is provided as one example, reflecting what we hear about most from our stakeholders and the general public. The purpose of the Emerging Technology Technical Report is to set forth policy frameworks and implementation ideas relating to the technologies that our member agencies and the public are most likely to be faced with. For future planning efforts we can consider preparing a more exhaustive list of all alternative fuel technologies.
0001488.16	Page 3, Column 2, Paragraph 2, last sentence Missing word – “As a part of [this or the] program, the agency also:	The correction is addressed in the Final Environmental Justice Technical Report.
0001488.17	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis Consider rephrasing as this suggests that minority or EJpopulations do not currently reside in suburban locations in theregion.	Comment noted. Language for the neighborhood change and displacement current conditions analysis has been revised for clarification.
0001488.18	5; Table 1; Rail-related impacts Asterisks but no corresponding note.	Corrections will be addressed in the Final Environmental Justice Technical Report.
0001488.19	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence Clarify if this is different than the Baseline definition usedelsewhere in the Plan.	The Baseline definition is consistent across all technical reports. Additional information and the definition may be found in the Connect SoCal Glossary.
0001488.20	p. 20; Table 5 Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.	In order to facilitate side-by-side comparison of the region and three separate tract-level Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the Environmental Justice Technical Report uses tract-level Census and ACS estimates as the best available approximation of 2000, 2010, and 2016 conditions. Table 5 data is aggregated from tract-level information in order to facilitate comparison with EJ geographies found in subsequent tables and may not sum to regional totals. Additionally, county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG’s county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001490 Related Documents Link
0001490.01	p. 21; column 1; Historical demographic trends; 2nd paragraph Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.	In order to facilitate side-by-side comparison of the region and three separate Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the Environmental Justice Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report.
0001490.02	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence Explain why the travel demand model predicts a future that is inconsistent with the trend.	SCAG's forecast of population, households, and employment at the small-area level generate secondary variables such as these which are required inputs for the travel demand model. These secondary variables are not independently derived and forecasted due to their limited purpose. Their inclusion in this technical report is to provide an improved illustration of historical trajectories and their inherent limitations are noted.
0001490.03	p. 23; Table 7; Total population Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.	In order to facilitate side-by-side comparison of the region and three separate Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the EJ Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report.
0001490.04	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph Verify 68.6 percent figure with Demographics and GrowthForecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.	In order to facilitate side-by-side comparison of the region and three separate Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the Environmental Justice Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report. Specifically, Table 5 of Environmental Justice Technical Report indicates a 68.6% share of population other than White, non-Hispanic in 2016 while the Demographics & Growth Forecast Technical Report indicates a 68.5% share (Table 3).
0001490.05	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.	In order to facilitate side-by-side comparison of the region and three separate Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the Environmental Justice Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report. Specifically, Table 5 of Environmental Justice Technical Report indicates a median age in 2016 of 35.6 from the ACS compared to 35.8 in the Demographics & Growth Forecast Technical Report (Table 3).

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001490 Related Documents Link
0001490.06	p. 30; column 1; Expectedfuture trends in Elgeographies; 2ndparagraph; last sentenceExplain why the travel demand model assumes a decrease inpoverty.	Thank you for your comment. SCAG's forecast of population, households, and employment at the small-area level generate secondary variables such as these which are required inputs for the travel demand model. These secondary variables are not independently derived and forecasted due to their limited purpose. Their inclusion in this technical report is to provide an improved illustration of historical trajectories and their inherent limitations are noted.
0001490.07	p. 30; column 1; Expectedfuture trends in Elgeographies; 3rdparagraph; 1st sentenceExplain why the travel demand model predicts a future that isinconsistent with the trend.	Thank you for your comment. SCAG's forecast of population, households, and employment at the small-area level generate secondary variables such as these which are required inputs for the travel demand model. These secondary variables are not independently derived and forecasted due to their limited purpose. Their inclusion in this technical report is to provide an improved illustration of historical trajectories and their inherent limitations are noted.
0001490.08	Table 13Add a column with the difference between High Wage and LowWage Commute Distance	For the Connect SoCal Environmental Justice (EJ) analysis, staff conducted the Jobs-Housing fit (JHFIT) analysis at both a jurisdiction and the census tract scale. The census tract-level JHFIT analysis is primarily to examine whether affordable housing and low-wage jobs are relatively balanced at the neighborhood scale, while the jurisdictional level JHFIT analysis is to examine it at a larger scale. For the neighborhood-level JHFIT analysis, staff used a distance buffer based on walking or biking as the primary means of travel to work, because it is also important to examine the job-housing ratio and JHFIT on a relatively short walk/bike-scale buffer that can also provide insights into broader commute patterns, in addition to jurisdictional level analysis, given home-workplace proximity is considered as one of major factors in household location choice, and this is particularly important when people change their home or workplace.
0001490.09	Page 39, Column 2,Paragraph 1“SCAG used the regional median household income—themidpoint of an income distribution in the SCAG region—as AreaMedian Income (AMI) limit and assumed that a housing unit isaffordable if a household whose income is at or below 80% ofthe AMI can live there without spending more than 30% of theirincome on rental units.”How was the regional median household income calculated?Why is AMI referenced if regional median was used? This reallyskews high wages and low wages between the region. Forexample, high wages in San Bernardino could be considered lowwages in Orange County. While this may help social equity at theregional level, it is misleading at the County level.	Many affordable housing analyses are based on the area median income (AMI). In this study, staff used the regional median household income as AMI income limit. The regional median household income data was obtained from Social Explorer ACS 2017 (5-Year Estimates) Table A14006 Median Household Income. Staff used the regional median household income since this study is to examine the JHFIT pattern at the regional level. In addition, in this study, consistent wage threshold (wage range used by LEHD data) was used for the entire region; therefore, it would be more appropriate to use one AMI threshold.
0001490.10	Page 39, Column 2,Paragraph 1, LastSentence“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and countedjobs and housing within the buffer distance to estimate the jobshousingratio and the low-wage jobs-housing fit at theneighborhood level.”This calculation at the census tract level seems like it would skewthe results for census tracts that are primarily residential. Forexample, refer to Exhibit 12 to see that residential areas withlittle to no commercial nearby demonstrate that the ratio of lowwagejobs to affordable rental units is extremely high. In manyareas, if more housing is built, it will result in a greater imbalancebetween jobs and housing.	For Connect SoCal EJ analysis, staff conducted the JHFIT analysis at both a jurisdiction and the census tract scale. The census tract-level JHFIT analysis is primarily to examine whether affordable housing and low-wage jobs are relatively balanced at the neighborhood scale; so, staff used a distance buffer based on walking or biking as the primary means of travel to work. It is important to emphasize that focusing on a relatively short walk/bike-scale buffer can also provide insights into broader commute patterns, since home-workplace proximity continues to be a major factor in household location choice, and this is particularly important when people change their home or workplace.
0001490.11	Page 39, Column 2,Paragraph 3EXHIBIT 9 - EXHIBIT 12	Corrections will be addressed in the Final Environmental Justice Technical Report.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001490 Related Documents Link
0001490.12	p. 45; column 1; Results;2nd paragraph; 1stsentenceClarify end of sentence—"...future Technical Report."	Corrections will be addressed in the Final Environmental Justice Technical Report.
0001490.13	Page 46, Column 2,Paragraph 3"They found that neighborhoods with higher public and privateinvestment experienced more gentrification. "	Corrections will be addressed in the Final Environmental Justice Technical Report.
0001490.14	Page 49, Paragraphs 3-5Who is "he" referenced in the analysis?Replace "he" with name of researcher/s.	Clarifications will be addressed in the Final Environmental Justice Technical Report.
0001490.15	Exhibit 13, p. 54Remove I5 BRT line from map	Comment noted. The map will be revised in the Final Environmental Justice Technical Report.
0001490.16	Exhibit 14, p. 55Define 'communities of concern' on the map.Some of these communities are brand new (e.g., Aliso Viejo,Rancho Santa Margarita) or were quickly developed over severaldecades and thus, have experienced significant change, but arefar from being considered gentrified communities.	Definition of 'communities of concern' is on page 2.
0001490.17	p. 73; column 2; Results;2nd paragraph; 4thsentence and p. 74; column 2;Accessibility to the SanGabriel NationalMonumentWhy the San Gabriel National Monument? For example, theSanta Monica Mountains National Recreation Area is accessibleby regular bus service. Every state park in Orange County is accessible by transitplus a three-mile walking threshold.	The San Gabriel National Monument project was completed as part of a separate study in collaboration with the United States Forest Service (USFS). Due to its relevance to the topic, it was included in this section of the Environmental Justice Report as an example of some of the accessibility issues seen throughout our region. While there are some open space areas that are easily accessible by public transportation, there are many that are not. Future examples of parks and their accessibility to public transportation could be useful in future regional transportation plans.
0001490.18	p. 92-93; Exhibits 21 and22An EJ area overlay would be useful.	Comment noted. The maps will be revised in the Final Environmental Justice Technical Report.
0001490.19	p. 95; column 1; Casestudy 1 – Advancedresearch on the builtenvironment andcollisionsSuggest enhancing the linkage to EJ.	Comment noted. "Case Study 1 - Advanced Research on the Built Environment and Collisions" was completed in 2017 in collaboration with Cal Poly Pomona and is meant to be used as supplemental information in addition to SCAG's in-house analysis which is focused on Environmental Justice communities. However, your comment will be considered for future collaborative studies.
0001490.20	Page 95, Column 2,Paragraph 3, LastSentence"Therefore, the collisions not only between automobile andbicycle but also between automobiles do not standout at the intersections with bicycle lane. "	Suggested revision is addressed in the Final Environmental Justice Technical Report.
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001491 Related Documents Link
0001491.01	p. 99; Exhibit 24, p. 101; Exhibit 25, p. 103; Exhibit 26An EJ area overlay would be useful.	Suggested revision is addressed in the Final Environmental Justice Technical Report.
0001491.02	p. 114; column 2; Trendsand dynamics of aviationnoise in the SCAG regionand beyond; 1stparagraphReplace "SCAG Aviation Technical Chapter" with "Aviation andAirport Ground Access Technical Report"	Suggested revision is addressed in the Final Environmental Justice Technical Report.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001491 Related Documents Link
0001491.03	p. 116; column 1; Roadway noise impacts; 1st paragraph Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.	The SCAG region has an extensive roadway system, with nearly 23,000 centerline miles or 73,000 lane miles. It includes one of the country's most extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of High Occupancy Toll (HOT) lanes. The region also has a vast network of arterials and other minor roadways. Noise from these transportation facilities may cause significant environmental concerns. Noise impacts are also fully discussed in the PEIR (See Section 3.13, Noise).
0001491.04	p. 120; Exhibit 27 Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?	Roadway noise analysis is inclusive of all links of the SCAG transportation network, which contains freeways, highways, and major arterials. Exhibit 27 displays those links indicating that their Community Noise Equivalent Level (CNEL) exceeds the noise level of 65db. A CNEL exceeding 65db is generally considered unacceptable for residential areas.
0001491.05	p. 126-129; Exhibits 28-31 An EJ area overlay would be useful. Can resolution be improved?	Suggested revision is addressed in the Final Environmental Justice Technical Report. Because of the size of the report, map resolutions may be reduced. However, SCAG staff can provide high resolution maps to stakeholders upon request.
0001491.06	p. 134-135; Exhibits 32-33 An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.
0001491.07	p. 162; column 1; Results; 1st paragraph Suggest delete "general toll lanes," to match Table 57.	By 2045, there will be an additional 1,300 lane miles of highway projects as a result of Connect SoCal. These projects include improvements to mixed-flow highway lanes, Express or High Occupancy Toll lanes (HOT), and carpool or High Occupancy Vehicle lanes (HOV).
0001491.08	p. 164; Exhibit 34 An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.
0001491.09	p. 13; column 2; Highway system; last paragraph; 1st sentence What about I-710 and I-605?	I-710 and I-605 are considered major regional goods movement corridors. The list included here is meant to be an example of major regional goods movement corridors, and is not meant to be exhaustive.
0001491.10	p. 28; column 2; Figure 12 Capitalize "SCAG"	Referenced revision is reflected in the final Plan.
0001491.11	p. 14; column 2; Analytical approach; 2nd bullet Suggest revising language to reflect definition of Baseline from Glossary of main book.	Thank you for your comment on the draft Connect SoCal. The definition of 'Baseline' provided in the Performance Measures Technical Report will be reviewed to ensure consistency with the Connect SoCal Glossary.
0001491.12	Page 16, Column 1, Paragraph 3 (Land Consumption) Why does this only analyze agricultural land and not vacant land?	Thank you for your comment on the draft Connect SoCal Performance Measures Technical Report. The land consumption performance metric assesses the amount of previously rural or otherwise undeveloped open space that has been converted to a more intensive urbanized use. The paragraph referenced in your comment will be edited to clarify that implication.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001491 Related Documents Link</p>		
0001491.13	Page 18,Column 1,Paragraph 1(Average DistanceTraveled)Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4miles? Maybe indicate that this decrease is not significant?	Thank you for your comment on the draft Connect SoCal Performance Measures Technical Report. The referenced paragraph indicates that average distances traveled are projected to “decrease slightly.” Regarding the ‘significance’ of this decrease, while the percentages are relatively small, it is important to note that the region is making progress toward achieving reduced travel distances, even with a continually growing population.
0001491.14	p. 51; Table 16Suggest revising title to reflect pollutant emission reductions	Thank you for your comment. The title of Table 16 in the Connect SoCal Performance Measures Technical Report will be revised from ‘Criteria Pollutant Emissions’ to ‘Criteria Pollutant Emissions Reduction’.
0001491.15	p. 57; Table 20Verify Connect SoCal results for walk share (all trips) and bike share (alltrips) as it appears to be inconsistent with the main book and ActiveTransportation Technical Report	Thank you for your comment on the draft Connect SoCal. The values presented for walk share (all trips) and bike share (all trips) in the Performance Measures Technical Report will be reviewed to ensure consistency with other sections of Connect SoCal.
0001491.16	p. 58; Table 20Replace “0.0%” with “N/A” for Trend for GHG emission reductionsMissing footnote for asterisks for Baseline GHG emissions.Missing asterisks on Baseline criteria pollutant emissions to matchfootnote on page 59.	Thank you for your comments. Your requested edits will be reviewed and incorporated into the final report as appropriate.
0001491.17	p. 1; column 2;ExecutivesummaryVerify centerline and lane miles as it appears that values areinconsistent with Environmental Justice Technical Report andTransportation Conformity Technical Report.	Comment noted. Consistency issues will be addressed as part of the Final Connect SoCal.
0001491.18	p. 4; column 1;RegionalsignificanceVerify mileage as it appears that values are inconsistent withEnvironmental Justice Technical Report and TransportationConformity Technical Report.	Comment noted. Consistency issues will be addressed as part of the Final Connect SoCal.
0001491.19	P5, column 1,paragraph 3Is this the most recent available data- 2012?In the SCAG region, nearly 44 percent of all pedestrian injuries are atintersections. (California Highway Patrol (2012). California StatewideIntegrated Traffic Records System.)	Thank you for your comment. Unfortunately some data sets were not available for more recent years. SCAG made every effort to use the most up-to-date data sets whenever possible.
0001491.20	ALL EXHIBITSReference to Route 206? between the 210 and 15 freeways north ofFontana	Comment noted. Suggested changes will be made in the Final Connect SoCal.
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001493 Related Documents Link</p>		
0001493.01	Lack of text reference to Exhibits, Figures/ Tables	Comment noted.
0001493.02	P7 and Global,column 1,paragraph 1Unsubstantiated citing of statistics e.g., What is the source of thisinformation?On average, 1,500 people die, more than 5,200 are severely injuredand 136,000 are injured on roadways throughout the SCAG regionevery year. These collisions are happening in communities all over theregion, but 90% of collisions occur in urban areas and most collisionsoccur on local roads, not on highways. In fact, in the SCAG region, 65%of fatalities and serious injuries occur on less than 1.5% of the roadwaynetwork.	Comment noted. The Statewide Integrated Traffic Reporting System (SWITRS) serves as the primary source for crash data reflected in the Final Connect SoCal. For more information, please see the Final Transportation Safety & Security Technical Report.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001493 Related Documents Link
0001493.03	P10, column 1, paragraph after the 4 bullets SCAG will monitor these conditions to ensure they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?	Comment noted. SCAG will monitor conditions and in collaboration with partner stakeholders explore strategies to meet targets and advocate for potential funding, as appropriate and necessary.
0001493.04	pg. 11 EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)	Comment noted. Exhibit 2 is for illustrative purposes only. Suggested changes will be considered in the Final Connect SoCal.
0001493.05	pg. 12 EXHIBIT 3 Title - Plan Year 2045... (to be consistent with the text on p10 under Arterial Network).	Comment noted. Suggested changes will be incorporated into the Final Connect SoCal.
0001493.06	p. 20; Programmed commitments It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.	Comment noted.
0001493.07	Spell out all Acronyms when it's being used for the first time in the technical report	Comment noted. Acronyms will be spelled out on first use.
0001493.08	2; column 2; Importance to the regional transportation system; 2nd paragraph Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.	Thank you for your comment. The Metrolink route mile figure in this section of the Passenger Rail Technical Report is correct.
0001493.09	4; column 2; Regional; 1st paragraph Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.	Thank you for your comment. The route mile figure in the referenced section of the Passenger Rail Technical Report is correct.
0001493.10	Pg. 5 Explain what LINKUS is, or refer to the section that has the explanation	Thank you for your comment. Page 5 of the Passenger Rail Technical Report will be edited per the comment.
0001493.11	Pg. 5 Explain what type of capital improvements are being proposed/completed	Comment noted. The improvements are identified in the LOSSAN Rail Corridor Agency Business Plan.
0001493.12	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.	Thank you for your comment. Page 5 of the Passenger Rail Technical Report will be edited per the comment.
0001493.13	p. 6; column 1; Connectivity and gaps in service; 1st paragraph It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.	Comment noted. There are several stations along the LOSSAN Corridor that are served by Metrolink but not the Amtrak Pacific Surfliner as the Surfliner is an inter-city rail service.
0001493.14	p. 8; column 2; The Southwest Chief Provide applicable updates	Thank you for your comment. The Passenger Rail Technical Report will be updated per your comment.
0001493.15	Pg. 9 Correct the formatting error under Metrolink section	Thank you for your comment. Page 9 of the Passenger Rail Technical Report will be edited per the comment.
0001493.16	Pg. 11 The map should indicate different lines of Metrolink	Comment noted.
0001493.17	p. 14; column 1; Palmdale to Hollywood Burbank Airport Define "SAA"	Thank you for your comment. Page 14 of the Passenger Rail Technical Report will be edited per the comment.

ID	Comment	Response
<i>Submitted by</i> Orange County Council of Governments		
		Submittal 0001493 Related Documents Link
0001493.18	14; column 2Provide applicable updates on EIR/EIS documents.	Thank you for your comment. This section will be updated with most recently available information on the status of Environmental Impact Report/Environmental Impact Statement (EIR/EIS) documents, from the California High-Speed Rail Authority.
0001493.19	Pg. 17... all commuter and intercity trains enter and [exit] LAUS througha constricted five-track "throat" located north of station.	Thank you for your comment. Page 17 of the Passenger Rail Technical Report will be edited per the comment.
0001493.20	Pg. 18, Table 1Clarify why Tres Estrellas de Oro and TUFESA do not have associatedcities	Thank you for your comment. Table 1 of the Passenger Rail Technical Report will be updated per the comment, if the information is available.
<i>Submitted by</i> Orange County Council of Governments		
		Submittal 0001494 Related Documents Link
0001494.01	Pg. 19 Clarify why Tres Estrellas de Oro and TUFESA are not shown on themap	Thank you for your comment. Routes for Tres Estrellas de Oro and TUFESA were not available at the time the map was prepared. Exhibit 4 of the Passenger Rail Technical Report will be updated to include the routes if available, or to indicate the routes are not shown.
0001494.02	Pg. 23, Figure 5 Use/show percentages to demonstrate data. It's not clear what thenumbers mean.	Thank you for your comment. Figure 5 of the Passenger Rail Technical Report will be edited per the comment.
0001494.03	Pg. 24 and 26 Provide more clear status updates for projects	Comment noted.
0001494.04	Pg. 30 The effort took a comprehensive look at a variety of the agency'sorganizational elements including a strengths, weakness,opportunities, and threats analysis (SWOT analysis),....	Thank you for your comment. Page 30 of the Passenger Rail Technical Report will be edited per the comment.
0001494.05	Pg. 31 • A candidate project list is incorporated [into] the [MOU]for the \$1 billion in early investments to be funded by 2020.	Comment noted. P. 31 of the Passenger Rail Technical Report will be edited per the comment.
0001494.06	Pg. 34 Explain what the difference is between Constrained Plan andStrategic Plan	Comment noted. An explanation will be provided as per the comment. Constrained Plan projects are financially constrained, while Strategic Plan projects are unfunded and provided for informational purposes.
0001494.07	p. 2; column 2;Executivesummary; 1stparagraphSuggest revising comparison of criteria pollutant emissions to BaseYear per footnotes in Performance Measures Technical Report andmain book.	Comment noted. The Public Health Technical Report has been updated.
0001494.08	p. 2; right column;Executivesummary; 1stparagraphSuggest reference to Baseline definition in Glossary of main book	Comment noted. The Public Health Technical Report has been updated.
0001494.09	p. 2; column 2;Executivesummary; 2ndparagraphVerify time savings by mode, mode share changes between Baselineand Plan as it appears the values are not consistent with thePerformance Measures Technical Report, Active TransportationTechnical Report, and main book.	Comment noted. The Public Health Technical Report has been updated.
0001494.10	p. 45; Table 5 Verify Baseline and Plan values for share of growth in HQTAs as itappears to be inconsistent with main book.Verify Baseline and Plan values for criteria pollutants as it appears tobe consistent with main book. What unit are the criteria pollutantemissions shown?	Comment noted. The Public Health Technical Report has been updated.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001494 Related Documents Link</p>		
0001494.11	p. 46; Table 5 Verify Baseline and Plan values for share of jobs in HQTAs as it appearsto be inconsistent with main book.	Comment noted. The Public Health Technical Report has been updated.
0001494.12	p. 49; Table 8 Verify Plan value for percentage of PM peak transit trips less than 45minutes as it appears to be inconsistent with main book.	Comment noted. The Public Health Technical Report has been updated.
0001494.13	p. 52; column 2;Table 10Verify Baseline and Plan values for criteria pollutants as it appears tobe consistent with main book. What unit are the criteria pollutantemissions shown?	Comment noted. The Public Health Technical Report has been updated.
0001494.14	p. 56; column 1;Table 12Verify Baseline and Plan values for share of jobs in HQTAs as it appearsto be inconsistent with main book.	Comment noted. The Public Health Technical Report has been updated.
0001494.15	Tables 2 & 4 Add number of attendees for each event	Comment noted. For consistency purposes only aggregate numbers are listed in the Public Participation and Consultation Technical Report. For additional information please refer to Final Public Participation and Consultation Technical Report.
0001494.16	All maps in all reports/documents need to be branded with 2020RTP/SCS/Connect SoCal along with the specific report it is within. Mapsare often pulled out as singular items and the maps need to be standalonedocuments.	Comment noted. SCAG will consider your proposed recommendation.
0001494.17	Review use of “cities”. Word “jurisdictions” should often be used toinclude counties and incorporated cities, not just incorporated cities.	Comment noted. SCAG will consider your proposed recommendation.
0001494.18	p. 16-18, Figures 2,3,4Delete Figures 2,3, & 4.These figures include draft scenarios used at the public workshops that donot properly reflect development agreements and entitled projects. Thiswas shared with SCAG staff and its consultants at the public workshops.The response was that the maps would be corrected; they were nevercorrected. Although these were draft scenarios used to collect publicinput, since they do not properly reflect entitlements, they should beremoved from the SCS document so as to not further mislead any readerthat these were viable options.	Comment noted. These maps demonstrate compliance with Government Code §65080 (b)(2)(B) and will remain in the Sustainable Communities Strategy Technical Report. The text has been edited to emphasize the draft nature of these materials.
0001494.19	p. 16 column2, paragraph 2“In this future, more funding is available to invest in expanded bus and railnetworks...”Clarify where the funding comes from for these programs.	Comment noted. The referenced text has been edited to clarify the financially unconstrained nature of this scenario.
0001494.20	p. 16 column2, paragraph 2“More drivers would be able to make the switch to electric vehicles,because additional funding is secured for EV charging infrastructure andlocal consumer rebates make electric vehicles more accessible.”Clarify where the funding comes from for these programs. Explain howblackouts will be dealt with.	Comment noted. The referenced text has been edited to clarify the financially unconstrained nature of this scenario.
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001495 Related Documents Link</p>		
0001495.01	p. 22 column2, paragraph 2“Conversely, growth focused in urban areas often takes advantage ofexisting infrastructure and more efficient service to higher concentrationsof jobs and housing.”Add: But, infrastructure capacity needs to be evaluated to determine ifadditional growth will exceed capacity and would then requireinfrastructure expansion.	Comment noted. Land use policy decisions fall under the authority of the local governing jurisdiction. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, specific development decisions and related infrastructure capacity assessment is up to the local jurisdiction.

ID	Comment	Response
<i>Submitted by</i>	Orange County Council of Governments	Submittal 0001495 Related Documents Link
0001495.02	p. 29 column1, paragraph 2“...with priority placed on infill settings, existing/planned service areas andwithin the planning boundary outside of an agency’s legal boundary,otherwise known as “Spheres of Influence.,” where feasible.”	Comment noted.
0001495.03	p. 24-29; Exhibit 1-6 Suggest changing coloring for Urban Rail. Coloring used for2045 network works better.	Thank you for your comment. The 2016 Urban Rail coloring will be changed to match the 2045 color.
0001495.04	p. 76; column 1; PlannedHQTCs; 2nd paragraphReplace “V4” with “Exhibit 14”	Thank you for your comment. The Transit Technical Report will be edited per the comment.
0001495.05	p.84; last line Replace “V4” with “Exhibit 14”	Thank you for your comment. Page 84 of the Transit Technical Report will be edited per the comment.
0001495.06	p. 21; column 2;Connect SoCalNo BuildCorrect years of FTIP.	The referenced typos have been corrected (i.e., "FY 2018-2019") in the final Plan.
0001495.07	Pg 42 Right column, paragraph under Criteria and Procedures...of TCMs...the shortfall must be made up by either substituting a new TCMstrategy or by enhancing other control measures through thesubstitution. (sounds incomplete)	The sentence has been simplified (i.e., "... the shortfall must be made up through a TCM substitution") in the final Plan.
0001495.08	Pg 44 Last line on the left column—“see Section III.2 of this document.”Not clear which document this is referencing. (No Section III in theTechnical Report or Main document)	The referenced sentence has been deleted in the final Plan.
0001495.09	p. 10; Table 3.1;Local optionsales taxmeasuresLos Angeles County effectively levies a permanent 2.0 percent sales taxwith passage of Measure M.	Comment noted. We have updated the text based on this feedback.
0001495.10	p. 10; Table 3.1;Highway tollsSuggest deleting “(in core revenue forecast” since a toll revenue sourceis not included in the reasonable available sources.	Comment noted.
0001495.11	p.29 HIGHWAY TOLLS, first paragraph, revise as follows:TCA consists of two separate government entities—the San Joaquin HillsTransportation Corridor [Agency] (SJHTCA), which oversees theSan Joaquin Hills (State Route 73) toll road, and the Foothill/EasternTransportation Corridor [Agency] (F/ETCA), which oversees theFoothill (State Route 241) and Eastern (State Route 241, State Route261, and State Route 133) toll roads.	Thank you for your comment. We have incorporated your suggested clarifications.
0001495.12	Spell out all Acronyms when it’s being used for the first time in thetechnical report	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001495.13	Size of bullets are too big	Comment noted.
0001495.14	Pg. 1 Traffic collisions also relate to congestion and, thus, involve greenhousegas emission due to bottlenecking and emergency management fees.--does not make sense? Why would it involve fees? Is it meant to say cost?	Comment noted. The Transportation Safety & Security Technical Report has been updated to reflect the language change (from fees to cost).
0001495.15	Pg. 7 Existing Conditions [for] Safety: This section...	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001495.16	Pg. 21 Define “Traffic Calming Measures”.	Comment noted. The definition has been added in the Transportation Safety and Security report.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001495 Related Documents Link</p>		
0001495.17	<p>p. 29, column 1, paragraph 2 "Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table. SCAG recommends local jurisdictions implement strategies that could reduce fatalities and serious injuries related to aggressive driving and speeding, which could include, but are not limited to: • conducting public outreach... • identifying locations with... • promoting best engineering... • setting speed limits that are safe..." As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested. [see redline edit #6 on pg.60 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001495.18	<p>p. 29, column 2, paragraph 1 "SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, which could include, but are not limited to: • supporting roadway, intersection... • promoting implementation of ... • implementing design treatments... • working with Transit network... • establishing Safe Routes for ..." As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested. [see redline edit #7 on pg.60 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001495.19	<p>p. 30, column 2 [see redline edit #8 on pg.60 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001495.20	<p>p. 31, column 1 [see redline edit #9 on pg.60 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
<p><i>Submitted by</i> Orange County Council of Governments Submittal 0001497 Related Documents Link</p>		
0001497.01	<p>p. 31, column 2 [see redline edit #10 on pg.61 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001497.02	<p>p. 31, column 2 [see redline edit #11 on pg.61 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001497.03	<p>p. 34, column 1 [see redline edit #12 on pg.62 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001497.04	<p>p. 34, column 1 [see redline edit #13 on pg.62 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001497.05	<p>p. 34, column 1 [see redline edit #14 on pg.62 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001497.06	<p>p. 35, column 1 [see redline edit #15 on pg.62 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001497.07	<p>p. 35, column 1 [see redline edit #16 on pg.63 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>
0001497.08	<p>p. 36, column 2 [see redline edit #17 on pg.63 of attachment]</p>	<p>Comment noted. The Transportation Safety & Security Technical Report has been updated.</p>

ID	Comment	Response
<i>Submitted by</i> Orange County Council of Governments		Submittal 0001497 Related Documents Link
0001497.09	p. 37, column 1[see redline edit #18 on pg.63 of attachment]	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001497.10	p. 37, column 2[see redline edit #19 on pg.63 of attachment]	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001497.11	p. 38, column 1[see redline edit #12 on pg.64 of attachment]	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001497.12	p. 38, column 2[see redline edit #21 on pg.64 of attachment]	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001497.13	Pg. 39 4th bullet: sentence is not finished	Comment noted. The Transportation Safety & Security Technical Report has been updated to reflect the following combined action: SCAG will continue to represent Southern California on the California Strategic Highway Safety Plan (SHSP) Steering Committee, the California Walk Bike Technical Advisory Committee, and the Active Transportation Program Technical Advisory Committee.
0001497.14	Pg. 39 5th bullet: First part of the sentence is missing	Comment noted. The Transportation Safety & Security Technical Report has been updated to reflect the following combined action: SCAG will continue to represent Southern California on the California Strategic Highway Safety Plan (SHSP) Steering Committee, the California Walk Bike Technical Advisory Committee, and the Active Transportation Program Technical Advisory Committee.
0001497.15	Pg. 40 Urban areas are usually multi-modal and have more conflict points. Asspeed increases, driver focuses less on surroundings, [and the driver's]field of vision & ability to see pedestrians, bicyclists or carsentering the roadway is diminished.	Comment noted. The Transportation Safety & Security Technical Report has been updated.
<i>Submitted by</i> Orange County Transportation Authority		Submittal 0001498 Related Documents Link
0001498.01	1.All Documents Multiple locations Define acronyms before first use. For example, SB 375 appears first on page 2 but initially defined on page 41 of the main book.	Comment noted. The edits have been made to text wherever applicable.
0001498.02	2.All documentsMultiple locations Improve consistency in writing style—examples include spelling out percent vs. %, inconsistent number of decimal places when directly comparing values, uses of dash vs. en dash / em dash, capitalization of Plan vs. plan (when it is referring to Connect SoCal), etc.	Comment noted. The edits have been made to text wherever applicable.
0001498.03	3.All documentsMultiple locations Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.	Comment noted. SCAG will consider your suggestion in the Final Connect SoCal.
0001498.04	4.pg. 5; right column; Core VisionDifferentiate the following text with formatting and/or spacing: “Progress and next steps to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.	Comment noted. The edits have been made to text wherever applicable.
0001498.05	5.Pg. 5; right column; Key Connections Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.	Comment noted. The edits have been made to text wherever applicable.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001498 Related Documents Link
0001498.06	6. Pg. 5; right column; Economic Impact For jobs values, consider displaying in thousands to be more consistent with other values listed. Also, missing “per year” notation as these are average annual jobs.	Comment noted. The edits have been made to text wherever applicable.
0001498.07	7. Pg. 5; right column; Plan Benefits Verify values as it appears to be inconsistent with the Performance Measures Technical Report.	Comment noted. The edits will be made to ensure consistency between documents wherever applicable.
0001498.08	8. Pg. 8; right column; Laws that guide the Plan; 1st bullet. Verify that the reference be to “U.S.C.”, as in United States Code.	Comment noted. The edits have been made to text wherever applicable.
0001498.09	9. Pg. 11; left column; How the Plan was developed; 3rd paragraph Requested edits:SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of regionally significant transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including applicable transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the list of programs and projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional initiatives that go beyond county-level commitments and are intended to address challenges that are uniquely regional in nature.	Comment noted. The edits have been made to text wherever applicable.
0001498.10	10. Pg. 11; left column; How the Plan was developed; 4th paragraph; 5th line Replace “New Mobility” with “Mobility Innovations”	Comment noted. SCAG will consider your recommendation wherever applicable.
0001498.11	11. Pg. 11; right column; How the Plan was developed; 3rd paragraph Suggested edits: Feedback received through our CBO partners was used to identify areas where the Plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they have historically been disproportionately burdened by the negative outcomes associated with land use patterns and transportation policies. Highlights of what we heard from them include:	Comment noted. The edits have been made to text wherever applicable.
0001498.12	12.Pg. 13; right column; Connect SoCal technical reports Revise "Economic & Job Creation Analysis Jobs Forecast	Comment noted. The edits have been made to text wherever applicable.
0001498.13	13.Pg. 19; left column; Structural economic changes; last paragraph; last sentence Suggest revising to reflect that local option sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.	Clarified.
0001498.14	14. Pg. 22; Table 2.1, Share of Total Growth (2008-2016) Verify values as the majority appear to be inconsistent with the Demographics and Growth Forecast Technical Report.	Verified for consistency and updated.
0001498.15	15. Pg. 27, Exhibit 2.4 Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.	Please note that the referenced segment is included as a part of the primary highway freight system.
0001498.16	16.Pg. 29; Transportation system; 2nd, 3rd, and 5th bullets Tables 2.2 and 2.3 do not differentiate between bicycling and walking, so statements in bullets cannot be confirmed. Also, verify if the statements are accurate, comparing the numbers from the Demographic and Growth Forecast Technical Report, the statements appear to be unsupported.	Statements confirmed and modified as necessary.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Transportation Authority Submittal 0001498 Related Documents Link</p>		
0001498.17	17.Pg. 29; right column; Transportation system; last bullet Total number of trips are not addressed in Table 2.3, so the statement cannot be confirmed.	Updated to reflect data from the table.
0001498.18	18. Pg. 32; right column; Affordable housing; last paragraph Add the source for the economic benefits of new housing construction.	Reference added.
0001498.19	19.Pg. 41; left column; Access & mobility; 1st paragraph Clarify what is “outdated road technology”.	Comment noted. "Outdated road technology" is a generic expression used to describe obsolete technology associated with roadways, that could be related to pavement, roadway safety, signage, ITS etc.
0001498.20	20. Pg. 41; left column; Access & mobility; 2nd paragraph Provide a reference to Congestion Management Technical Report.	Comment noted.
<p><i>Submitted by</i> Orange County Transportation Authority Submittal 0001499 Related Documents Link</p>		
0001499.01	Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), and associated Program Environmental Impact Report (PEIR). The draft RTP/SCS and PEIR reflect the transportation and funding challenges that the region will face in the coming years. These documents are critical to the region's ability to improve mobility, and to operate and maintain the transportation system.The Orange County Transportation Authority (OCTA) appreciates that SCAG has included the commitments identified in OCTA's 2018 Long-Range Transportation Plan (LRTP), as well as demographic forecasts approved and submitted by the Orange County Council of Governments. Additionally, OCTA recognizes the hard work and cooperation of SCAG staff throughout the RTP/SCS and PEIR development process.	Thank you for your comments on Connect SoCal and its associated PEIR. Comments noted.
0001499.02	In reviewing the draft RTP/SCS and PEIR, OCTA has identified several policy and technical matters that require attention. These primarily focus on regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). The regional strategies include assumptions for new revenue sources, passenger rail assumptions, regional express lanes, and other investments beyond the LRTP. Additionally, OCTA recommends refining the mapping of High-Quality Transit Areas (HQTAs) to accurately reflect areas of transit accessibility.	Thank you for your comment. As this is an introductory statement, your specific comments and responses are addressed separately.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001499 Related Documents Link
0001499.03	<p>New Revenue Sources and Innovative Financing StrategiesThe draft RTP/SCS suggests that without the use of anticipated new revenuesources and innovative financing strategies, the region faces a funding shortfall ofapproximately \$139.4 billion (in year-of-expenditure dollars [YOE\$]). The following guiding principles were used to identify reasonably available funding sources toaddress the shortfall:Establish a user fee-based system that better reflects the true cost oftransportation, provides firewall protection for transportation funds, andensures an equitable distribution of costs and benefits.Promote national and state programs that include return-to-sourceguarantees, while maintaining flexibility to reward regions that continue tocommit substantial local resources.Leverage locally available funding with innovative financing tools (e.g., taxcredits and expansion of the Transportation Infrastructure Finance andInnovation Act) to attract private capital and accelerate project delivery.Promote local funding strategies that maximize the value of public assetswhile improving mobility, sustainability, and resilience.</p>	Comment noted.
0001499.04	<p>Utilizing these principles, the draft RTP/SCS identifies seven anticipated revenuesources and innovative funding strategies projected to generate \$139.4 billion(YOE\$) over the planning horizon. Two sources combined (mileage-based user feeand local road charge program) would account for nearly 86 percent of the identifiednew revenues sources. As noted in the draft RTP/SCS, several requisite actions areanticipated before full deployment of these new transportation user fees would berealized .</p>	Comment noted.
0001499.05	<p>OCTA recommends that SCAG staff provide regular updates to the SCAGTransportation Committee and Regional Council regarding the key implementationfactors of new transportation user fees, including but not limited to:• Technology and associated privacy issues,• Cost of implementation and administrative methods for fee collection/revenueallocation,Equity concerns and exemptions/credits, as applicable,Rate structures and associated impacts including evaluation of flat rates,differential pricing by type of vehicle including size and weight, time-of-day,and potentially emissions (including GHG emissions), andEconomic assessment.</p>	Comment noted.
0001499.06	<p>Further, OCTA recommends that SCAG staff also work with the CTCs and otherstakeholders to evaluate the impacts of the new transportation user fees on existinglocal transportation funding mechanisms including local option sales tax measures,express lanes and toll facilities, and consider how best to integrate the varioustransportation funding mechanisms. Additionally, any new user fees should includereturn-to-source criteria to ensure equitable distribution of funds.</p>	Thank you for your comment. The Transportation Finance Technical Report specifies that return-to-source guarantees for federal and state programs is a guiding principle used to identify reasonably available revenues. SCAG will update the plan to clarify that this guiding principle applies to local funding programs as well. Further, SCAG continues to work with the CTCs and other stakeholders to further evaluate new transportation user fee initiatives.
0001499.07	<p>Passenger Rail AssumptionsThe draft RTP/SCS assumes the Metrolink Southern California Optimized RailExpansion (SCORE) Program capital components are completed by 2035 at a costof \$10.5 billion (YOE\$). The SCORE Program would accommodate a significantincrease in Metrolink service with up to 15-minute peak-period service on much ofthe Metrolink system. The draft RTP/SCS also assumes SCORE Program operatingcosts between 2035 and 2045 of \$3.2 billion (YOE\$), funded by new revenuesources and innovative funding strategies.</p>	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001499 Related Documents Link
0001499.08	The draft RTP/SCS further includes phase one of the California High-SpeedRail (CHSR) Project at a regional cost of \$34.6 billion (YOES). The CHSR 2018Business Plan redefined the initial operating segment from between theCity of Merced (in the San Joaquin Valley) and the Burbank Bob Hope Airport stationto between the cities of Merced and Bakersfield, with revenue service starting in late2028. Phase one, which would span from the City of San Francisco to theCity of Anaheim, is anticipated to start revenue service in 2033.	Comment noted.
0001499.09	OCTA recommends that SCAG staff provide regular updates to the SCAGTransportation Committee and Regional Council regarding both the CHSR Projectand the Metrolink SCORE Program. OCTA recommends that SCAG staff coordinateefforts to develop an integrated capital and operating plan for the CHSR Project andthe Metrolink SCORE Program. Additionally, OCTA suggests that SCAG staff assistMetrolink and the CTCs in detailing implementation steps for the SCORE Programincluding securing new revenue sources to support operations at the levels assumedin the draft RTP/SCS.	Thank you for your comment. SCAG is actively working with its rail partners, including CHSRA, the LOSSAN Agency and the Southern California Regional Rail Authority in the planning, coordination and funding of these critical rail projects to increase mobility in our region. SCAG also regularly updates its Regional Council and Transportation Committee on passenger rail updates.
0001499.10	Regional Express Lane NetworkThe draft RTP/SCS generally carries over the proposed regional express lanenetwork included in the adopted 2016-2040 RTP/SCS. The draft RTP/SCS proposedregional express lane network segments would add the following Orange Countyexpress lane segments:Facility1-405SR-73SR-551-6051-405- Interstate 405SR-91 -State Route 91FromSR-55MacArthur Boulevard1-4051-405SR-55- State Route 551-605- Interstate 605ToLos Angeles County line1-405SR-91Los Angeles County lineSR-73- State Route 73	Comment noted.
0001499.11	The draft RTP/SCS proposed regional express lane network also identifies expresslane connectors in Orange County at the following interchanges: 1-405/1-605,1-405/SR-73, 1-405/SR-55, SR-55/1-5, and SR-55/SR-91.The draft RTP/SCS should recognize that the OCTA Board of Directors has notapproved conversion from high-occupancy vehicle to tolled express lanes for SR-55,SR-73, 1-605, or on 1-405 north of 1-605 as depicted in the proposed regional expresslanes network. Furthermore, the draft RTP/SCS should clearly recognize that theproposed regional express lane network is subject to further study to evaluateright-of-way impacts, community issues, and overall feasibility.	Thank you for your comment. SCAG, in partnership with the California Department of Transportation (Caltrans), the Federal Highway Administration (FHWA), the Los Angeles County Metropolitan Transportation Authority (Metro), the Orange County Transportation Authority (OCTA), the San Bernardino Associated Governments (SANBAG), and the Riverside County Transportation Commission (RCTC) collaborated on the development of a regional concept of operations for a regional express lane network. The Concept of Operations provides a blueprint for a regional express lane network that integrates express lane facilities into a regional system with consistent or compatible operating, design and policy rules. This development process also resulted in the recommended regional express lane network identified in Connect SoCal and in the previously adopted 2016 RTP/SCS. SCAG recognizes that the network identified from this prior effort will continue to evolve as our respective partner agencies further study projects.
0001499.12	Other Investments Beyond the 2018 LRTPThe draft RTP/SCS proposes several other investments in addition to those notedherein that affect Orange County and go beyond the LRTP. Examples include:• \$6 billion (YOES) to expand bus service in high-quality transit corridors,• \$2 billion (YOES) for a plug-in electric vehicle rebate program,• \$5 billion (YOES) for safety initiatives,\$2 billion (YOES) in a mobility equity fund,\$3 billion (YOES) for housing-supportive infrastructure, and\$2 billion (YOES) for pooled incentives.SCAG staff have stated that these investments are being funded with new revenuesources and innovative financing strategies.	Comment noted.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Transportation Authority Submittal 0001499 Related Documents Link</p>		
0001499.13	<p>An additional emphasis is also placed on active transportation improvements with the draft RTP/SCS proposing to invest \$22.5 billion (YOE\$). About \$3.7 billion(YOE\$) of the total investment reflects active transportation projects submitted byCTCs. SCAG proposes investing another \$14 billion (YOE\$) from the draft RTP/SCSnew revenue sources and innovative financing strategies. SCAG then estimates thatthe remaining \$4.8 billion (YOE\$) would be invested in active transportationcomponents of roadway operations and maintenance efforts.</p>	Thank you for your comment.
0001499.14	<p>OCTA recognizes that it is within SCAG's purview to plan for regional strategies thatenhance transportation; however, it should be noted that OCTA is committed todelivering the projects within the LRTP. The draft RTP/SCS should clearly state thatthe regional strategies suggest improvements beyond the projects submitted byOCTA, and that the implementation of the strategies is subject to availability of newrevenue sources and the necessary project development and review processes bythe implementing agencies. OCTA will only consider additional investments after newrevenues are realized and identified to account for these additional improvements.</p>	Comment noted.
0001499.15	<p>Mapping of HQTAsAs noted in the draft RTP/SCS, HQTAs are defined as "generally a walkable transitvillage or corridor, consistent with the adopted RTP/SCS, and is within one half-mileof a well-served transit stop or a transit corridor with 15-minute or less servicefrequency during peak commute hours." The draft RTP/SCS further notes that SCAGbased the definition on language in SB 375 (Chapter 728, Statutes of 2008), whichdefines Major Transit Stops and HQTcs. OCTA recommends revising the mappingof HQTAs in the RTP/SCS to reflect the nuance with certain HQTcs that fail to meetthe "walkable corridor" characterization . Namely, freeway-running segments ofHQTcs are clearly not walkable and should be treated like a rail transit service,focusing only on stop locations when operating on a freeway. Additionally, OCTAnotes that subsequent use of HQTAs for other planning activities and/or policydecisions should recognize that transit agencies adjust existing service on a regularbasis and planned improvements are expected to be implemented by the RTP/SCShorizon year of 2045. For example, planned improvement could fall outside the SixthCycle Regional Housing Needs Assessment timeframe. Transit planning studiesmay also be completed by transit agencies on a more frequent basis than theRTP/SCS is updated by SCAG.</p>	The definition of HQTAs will be updated to clarify that freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTa. Exhibits will be updated accordingly.
0001499.16	<p>Additional technical comments will be submitted separately. OCTA appreciates SCAG's work on the RTP/SCS and PEIR and looks forward to the adoption of the final 2020-2045 RTP/SCS and PEIR in Apri.</p>	Comment noted.
<p><i>Submitted by</i> Orange County Transportation Authority Submittal 0001500 Related Documents Link</p>		
0001500.01	<p>21 .Pg. 59; left column; Preserve & optimize our current system; last sentence It would be appropriate to include the investment in regionally significant local streets and roads and not just the State Highway System.</p>	Comment noted. Suggested changes will be considered in the Final Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001500 Related Documents Link
0001500.02	22. Pg. 59; right column; Planning for 2045; 1st paragraph Suggested edit: The Plan includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and \$47.5 billion towards preservation, operation and resiliency needs of the regionally significant local streets and roads.	Comment noted. Suggested changes will be incorporated into the Final Connect SoCal.
0001500.03	23. Pg. 64; left column; Transportation system management; 1st sentence Revise to reflect that TSM is broader than ITS.	Thank you for your comment. Chapter 3, page 64, will be revised per the comment.
0001500.04	24. Pg. 73; right column; Highway & arterial network; 2nd paragraph Suggest removing toll lanes as none are indicated in exhibit or table: ...EXHIBIT 3.2 and TABLE 3.2. Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll lanes and Express/HOT lanes. The complete list of projects can be found in the Project List Technical...	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001500.05	25. Pg. 74; left column; Highway & arterial network; 1st paragraph; 5th line Requested edit: ...believes merits future consideration for potential inclusion in the financially constrained...	Comment noted.
0001500.06	26. Pg. 74, right column, Regional express lane network; 2nd paragraph Replace "1-105" with "I-105"	Comment noted. Suggested changes will be made in the Final Connect SoCal.
0001500.07	27. Pg. 75; Exhibit 3.2 The OCTA Board has not approved the HOV-to-HOT Direct Connector Conversions shown here.	Comment noted. Exhibit 3.2 is intended for illustrative purposes only.
0001500.08	28. Pg. 79; Exhibit 3.3 The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR-55 and SR-73 as illustrated in this exhibit. Note there is a Missing Planned Express Lane Direct Connector at SR-91 and SR-241 interchange.	Comment noted.
0001500.09	29. Pg. 81; right column; Table 3.3 Define the airport codes as many are not commonly known.	Comment noted. A footnote will be added under Table 3.3 that will read "Please refer to the Aviation and Airport Ground Access Technical Report Commercial Service Airports. The SCAG Region (FAA Code) section and Table 3: General Aviation and Reliever Airports in the SCAG Region will provide the airport names associated with FAA airport codes".
0001500.10	30. Pg. 87 & 89; Exhibits 3.4 & 3.6 Verify the location of job centers on these figure as they do not appear to match. Revise Exhibit 3.4 HQTAs mapping to remove HQTAs segments that fail to meet the "walkable corridor" characterization.	Comment noted. Exhibits 3.4 and 3.6 have been updated.
0001500.11	31. Pg. 91; Exhibit 3.8 Revise HQTAs mapping and narrative to remove HQTAs segments that fail to meet the "walkable corridor" characterization.	Comment noted. Exhibit 3.8 has been updated.
0001500.12	32. Pg. 108; Table 4.5.1; Local option sales tax measures With passage of Measure M, Los Angeles County effectively levies a permanent 2.0 percent sales tax.	Comment noted.
0001500.13	33. Pg. 108; Table 4.5.1; Highway tolls Suggest deleting "(in core revenue forecast)" since a toll revenue source is not included in the reasonable available sources.	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001500 Related Documents Link
0001500.14	34. Pg. 107; Table 4.4; Local road charge program Clarify if this revenue source would be indexed to maintain purchasing power.	Thank you for your comment. SCAG has updated the table to clarify that the local road charge program would be indexed to maintain purchasing power.
0001500.15	35. Pg. 114; Table 4.6.2; Active Transportation Suggest moving the asterisk from “Active Transportation” to “Regionally Significant Local Streets and Roads”	Comment noted.
0001500.16	36. Pg. 118; left column; Connect SoCal & performance-based planning; 3rd column; 4th line Suggested edit: ...that comprise the SCAG region. With the Plan, In this scenario, trips to work, schools and other...	Thank you for your comment. The language structure used in the indicated sentence in the Connect SoCal ‘Measuring Our Progress’ chapter will be reviewed for enhanced clarity.
0001500.17	37. Pg. 120, left column; Connect SoCal performance outcomes; 2nd bullet Consider a closer linkage to the definition of Baseline in the Glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline	Thank you for your comment. The definition of ‘Baseline’ provided in the Performance Measures Technical Report will be reviewed to ensure consistency with the Connect SoCal Glossary.
0001500.18	38. Pg. 121; Connect SoCal performance profile Suggest replacing “Trend” with “Baseline”	Thank you for your comment. We will review the use of the labels ‘Trend’ and ‘Baseline’ in the context of the performance profile graphic featured in the Performance Measures Technical Report to ensure consistency with other similar graphics used in Connect SoCal.
0001500.19	39. Pg. 122; Connect SoCal performance results The note is misleading here as it is different than what has been defined elsewhere—particularly in the Glossary.	Thank you for your comment. We will review the content of the note provided in support of the ‘Connect SoCal Performance Results’ graphic in the Performance Measures Technical Report to ensure consistency with the Glossary.
0001500.20	40. Pg. 125; Table 5.1 Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.	Thank you for your comment in reference to Table 5.1 of the Draft Connect SoCal Performance Measures Technical Report. Your observation that the performance results for fatality rate and serious injury rate are reversed in the table is accurate. This error will be corrected in the final version of the report.
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001501 Related Documents Link
0001501.01	41. Pg. 125; Table 5.1 The Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) appear to be inconsistent with the Performance Measures Technical Report and the Active Transportation Technical Report.	Thank you for your comment. Mode share data will be updated for consistency across all technical reports.
0001501.02	42. Pg. 126; Table 5.1 Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emission values.	Thank you for your comment. The asterisks in reference to Table 5.1 will be updated accordingly.
0001501.03	43. Pg. 131; left column; Figure 5.3 Title appears to be missing “, Thousands	Thank you for your comment. The title for Figure 5.3 will be updated accordingly.
0001501.04	44. Pg. 132; left column; Mean commute time Verify listed values as they appear to be inconsistent with Public Health Technical Report.	Thank you for your comment. The performance results presented in the Connect SoCal ‘Measuring Our Progress’ chapter for mean commute time by mode will be reviewed to ensure consistency with other sections of Connect SoCal.
0001501.05	45. Pg. 133; right column; Outcome 3: safety & public health; 2nd paragraph; 4th sentence The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.	Thank you for your comment. The public health performance results presented in the Connect SoCal ‘Measuring Our Progress’ chapter will be reviewed to ensure consistency with the Final Public Health Technical Report.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001501 Related Documents Link
0001501.06	46. Pg. 134; left column; Outcome 5: economic opportunity; last sentence Reductions in health care expenditures are not in itself an economic opportunity—the potential economic activity associated with the expenditure of the health cost savings on other things should be considered here.	Thank you for your comment on the Draft Connect SoCal. The paragraph referenced in your comment will be reviewed in the context of your observation regarding the regional economic impact of the health care cost savings due to Connect SoCal investments.
0001501.07	47. Pg. 135; left column; Outcome 7: transportation system sustainability; 2nd paragraph Replace “\$312 billion” with “\$316 billion” Suggest removing the reference to Transportation Safety and Security Technical Report.	Thank you for your comments in regard to the Connect SoCal Performance Measures Technical Report. The Connect SoCal total O&M investment value will be revised in the report to \$316 billion. The reference to the Transportation Safety & Security Technical Report will be replaced by a reference to the ‘Paying Our Way Forward’ chapter of Connect SoCal.
0001501.08	48. Pg. 136; Table 5.3; 1st row Suggest including a note: “Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.”	Thank you for your comment. Your suggestion for adding an explanatory note in reference to Table 5.3 will be incorporated into the final document.
0001501.09	49. Pg. 142; right column; Roadway noise impacts Verify centerline miles and lane miles as figure appears to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report. Suggested edit: It also includes one of the country’s most extensive HOV systems and a growing network of HOT lanes.	Thank you for your comments on the Draft Connect SoCal. The values presented for centerline miles and lane miles in the 'Roadway Noise Impacts' paragraph will be reviewed to ensure consistency with other sections of Connect SoCal. Your suggested revision will be evaluated for inclusion in the final document.
0001501.10	50. Pg. 143; left column; Connect SoCal revenue sources & tax burdens; 2nd sentence Suggested edit: Sales and gasoline taxes, which are currently the primary sources of funding for the region’s transportation system, were evaluated for the purposes of this analysis.	Comment noted.
0001501.11	51. Pg. 143; right column; Connect SoCal Investments; 1st sentence Suggested edit: The strategies that public agencies pursue to invest in transportation systems presents potential impacts on EJ.	Thank you for your comment. Your requested revision will be reviewed and incorporated into the final document as appropriate.
0001501.12	52. Pg. 143; right column; Mileage-based user fee impacts This should be updated to also account for the local road charge program.	Comment noted.
0001501.13	53. 147; Table 5.4; Mileage based user fee impacts This should be updated to also account for the local road charge program.	Thank you for your comment. This impact assessment more broadly applies to all mileage-based user fee programs, including the local road charge program.
0001501.14.1	55. Multiple locations Many terms and acronyms are included in the Glossary that do not appear elsewhere. Do they need to be included in the Glossary? Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.	Comment noted. Proposed revisions will be considered in the Final Connect SoCal.
0001501.14.2	Consider adding a definition of rapid bus, especially to differentiate between bus rapid transit.	Thank you for your comment. A definition of rapid bus will be added to the Glossary.
0001501.15	56. Data Index Pg. 177; Technical reports Change from "Economic & Job Forecast" to "Economic & Job Creation Analysis"	Comment noted. The edits have been made to text wherever applicable.
0001501.16	57. Pg. 22; left column; Regional Agency Engagement; 7th line Suggested edit: ...Plans, SBCTA’s Sidewalk Inventory project, OCTA’s OC Active, strategic first-last mile...	Thank you for your comment. Suggested text modification has been incorporated.

ID	Comment	Response
<i>Submitted by</i> Orange County Transportation Authority		
		Submittal 0001501 Related Documents Link
0001501.17	58. Pg. 42; Figure 27 Suggest replicating figure from cited source as this graphic does not convey the message as effectively.	Thank you for your comment. Figure 27 will be adjusted for better legibility.
0001501.19	59. Pg. 44; right column; Current bikeway network; 1st sentence This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have a greater share of bikeways.	Thank you for your comment. Sentence has been rewritten to address concern.
0001501.20	60. Pg. 49; left column; Cities and counties; 2nd paragraph; 1st sentence This is not an accurate statement as the funding in Orange County is significantly below the its share of the region's population.	Thank you for your comment. Table 7 has been updated to reflect corrected funding totals.
<i>Submitted by</i> Orange County Transportation Authority		
		Submittal 0001503 Related Documents Link
0001503.01	pg. 46; right column; Neighborhood change and displacement; 1st paragraph; last sentence Suggest providing a clearer distinction between homeowners and renters. Are the impacts different?	Comment noted. Clarifications will be addressed in the Final Environmental Justice Report.
0001503.02	pg. 54; Exhibit 13 Revise HQT mapping and narrative to remove HQT segments that fail to meet the "walkable corridor" characterization.	Suggested revision is addressed in the Final Environmental Justice Technical Report.
0001503.03	pg. 73; right column; Results; 2nd paragraph; 4th sentence Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service.	The San Gabriel National Monument project was completed as part of a separate study in collaboration with the United States Forest Service (USFS). Due to its relevance to the topic, it was included in this section of the Environmental Justice Report as an example of some of the accessibility issues seen throughout our region. While there are some open space areas that are easily accessible by public transportation, there are many that are not. Future examples of parks and their accessibility to public transportation could be useful in future regional transportation plans.
0001503.04	pg. 74; right column; Accessibility to the San Gabriel National Monument Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.	The San Gabriel National Monument project was completed as part of a separate study in collaboration with the United States Forest Service (USFS). Due to its relevance to the topic, it was included in this section of the Environmental Justice Report as an example of some of the accessibility issues seen throughout our region. While there are some open space areas that are easily accessible by public transportation, there are many that are not. Future examples of parks and their accessibility to public transportation could be useful in future regional transportation plans.
0001503.05	pg. 92-93; Exhibits 21 and 22 An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.
0001503.06	pg. 95; left column; Case study 1 – Advanced research on the built environment and collisions Suggest enhancing the linkage to EJ.	Suggested revision is addressed in the final Plan.
0001503.07	pg. 99; Exhibit 24 An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.
0001503.08	pg. 101; Exhibit 25 An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001503 Related Documents Link
0001503.09	pg. 103; Exhibit 26An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.
0001503.10	pg. 114; right column; Trends and dynamics of aviation noise in the SCAG region and beyond; 1st paragraphReplace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”	Corrections will be addressed in the Final Environmental Justice Technical Report.
0001503.11	pg. 116; left column; Roadway noise impacts; 1st paragraphVerify value for centerline miles as it appears to be inconsistent with the main book and Highways and Arterials Technical Report.Suggested edit:...extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of toll lanes, as well as High Occupancy Toll (HOT) lanes. The region also has...	The SCAG region has an extensive roadway system, with nearly 23,000 centerline miles or 73,000 lane miles. It includes one of the country’s most extensive High-Occupancy Vehicle (HOV) lane systems and a growing network of High Occupancy Toll (HOT) lanes. The region also has a vast network of arterials and other minor roadways. Noise from these transportation facilities may cause significant environmental concerns.Noise impacts are also discussed in the Final Connect SoCal PEIR (See Section 3.13, Noise).
0001503.12	pg. 120; Exhibit 27Why are low volume, lower speed State Highways included here, such as SR-39 and SR-74?	Roadway noise analysis is inclusive of all links of SCAG transportation network, which contain freeways, highways, and major arterials. Exhibit 27 displays links indicating that the Community Noise Equivalent Level (CNEL) exceeds the noise level of 65db. CNEL exceeding 65db is generally considered unacceptable for residential areas.
0001503.13	pg. 126-129; Exhibits 28-31An EJ area overlay would be useful. Can resolution be improved?	Suggested revision is addressed in the Final Environmental Justice Technical (EJ) Report. Because of the size of the report, map resolutions may be reduced. However, SCAG staff can provide high resolution maps to stakeholders upon request.
0001503.14	pg. 134-135; Exhibits 32-33An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.
0001503.15	pg. 162; left column; Results; 1st paragraphSuggest delete "general toll lanes," to match Table 57.	Suggested revision is addressed in the final Plan.
0001503.16	pg. 164; Exhibit 34An EJ area overlay would be useful.	Comment noted. Maps will be revised in the Final Environmental Justice Technical Report.
0001503.17	pg. 165; Impacts from funding through mileage-based user feesSuggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.	Thank you for your comment. This impact assessment more broadly applies to all mileage-based user fee programs, including the local road charge program.
0001503.18	pg. 8; Exhibit 1Request adding SR-55 between I-405 and I-5 as a Major Freight Highway Corridor based on truck volumes.	Please note that the segment referenced is identified as a part of the primary highway freight system.
0001503.19	pg. 13; right column; Highway system; last paragraph; 1st sentenceWhat about I-710 and I-605?	I-710 and I-605 are considered major regional goods movement corridors. The list included here is meant to be an example of major regional goods movement corridors, and is not meant to be exhaustive.
0001503.20	pg. 28; right column; Figure 12Capitalize “SCAG”	Revision made.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001504 Related Documents Link
0001504.01	Pg. 57; right column; Table 8; 2045 Connect SoCal average commute time walking Verify figure as it appears to be inconsistent with the Public Health Technical Report.	Thank you for your comment. The Public Health Technical Report displays the average commute time of people walking and bicycling combined. The Active Transportation Technical Report shows the average commute time for the two modes separately.
0001504.02	Pg. 58; right column; Table 9 Verify figures for both Baseline and Plan as they appear to be inconsistent with the main book and Performance Measures Technical Report.	Thank you for your comment. Figures in Table 9 will be updated for consistency with the main book and Performance Measures Technical Report.
0001504.03	Pg. 63; left column; Technology and micro-mobility strategies; 1st bullet Is this an example or the “regional standard”?	Thank you for your comment. This is one example. While it is useful, the Mobility Data Standard (MDS) is not without its challenges, and would not be recommended as a regional standard until more vetting.
0001504.04	Pg. 65; Table 10; Total Check the math or include a note that it does not sum to the total due to rounding.	Thank you for your comment. Note will be added to table regarding rounding math.
0001504.05	Pg. 67; left column; Actions for technology and micromobility; 1st bullet Why only Caltrans?	Comment noted. Text will be revised to refer to county transportation commissions and local jurisdictions.
0001504.06	Pg. 68; left column; Strategic Plan; 1st paragraph Suggested edit: Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.	Thank you for your comment. The Connect SoCal cost assumptions include an assumed rate of inflation, so the total is not in nominal dollars. Text has been edited for clarity.
0001504.07	Pg. 68; left column; Strategic Plan; 3rd paragraph; 1st sentence Clarify if this is in addition to the \$22.5 billion included in the constrained plan.	Thank you for your comment. Clarification has been added to this sentence that the \$28 billion is a total cost, not in addition to the constrained Plan.
0001504.08	Pg. 68; right column; Table 11 walking and bicycling mode share Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report	Thank you for your comment. Numbers will be verified for Plan consistency.
0001504.09	Pg. 69; left column; Strategic Plan; 1st paragraph; last sentence Suggest revising this statement so that it is clear that the Plan is financially constrained.	Thank you for your comment. Statement has been revised for clarity.
0001504.10	Pg. 79; Table 12; last row Requested edits: OC Orange County Active Transportation Plan 2019 In Progress	Thank you for your comment. Technical Report has been edited to reflect recommended changes.
0001504.11	Pg. 86; Table 13; 1st row Requested edits: OC Orange County Active Transportation Plan 2019 In Progress	Thank you for your comment. Technical Report has been edited to reflect recommended changes.
0001504.12	Pg. 7; right column; Ontario International Airport (LAX) Replace “LAX” with “ONT”	Comment noted. "Ontario International Airport (LAX)" will be corrected to reflect "Ontario International Airport (ONT)" on page 7.
0001504.13	Pg. 8; left column; Ontario International Airport (LAX); 2nd paragraph; last sentence Missing period after “7 MAP” and missing sentences after “As for air cargo, Ontario”...	Comment noted. A period will be placed after “7 MAP” on page 7, the last paragraph in the right column, and page 8, the first full paragraph on the left column. The sentence, “As for air cargo, Ontario...” will be completed to read “As for air cargo, Ontario Airport cargo activity has been steadily increasing since the housing crisis of 2008, reaching 654,000 tons in 2017.”
0001504.14	Pg. 10; Table 1 Update table with applicable destination information. Air Canada is listed twice.	Comment noted. Table 1 "Commercial Air Carriers (and Destinations) Operating in the SCAG Region Airports" will be updated to remove the redundant row/entry where Air Canada is listed twice.

ID	Comment	Response
Submitted by Orange County Transportation Authority		
0001504.15	Pg. 22-23 and 31 Replace "2020-2040 RTP/SCS" with "2020-2045 RTP/SCS"	Comment noted. "2020-2040 RTP/SCS" will be replaced with "2020-2045 RTP/SCS" on pages 22, 23, and 31.
0001504.16	Pg. 6; left column; Roles and responsibilities of partner agencies; 1st paragraph Replace "SGAG" with "SCAG"	Thank you for your comment. Page 6 of the Congestion Management Technical Report will be edited per the comment.
0001504.17	Pg. 11; Aggregate regional and county trends; last paragraph; 1st sentence Replace "EXHIBIT" with "FIGURE"	Thank you for your comment. Page 11 of the Congestion Management Technical Report will be edited per the comment.
0001504.18	Pg. 22; left column; Regional and county congestion trends Add references to Exhibit 1 and Table 3	Thank you for your comment. Page 22 of the Congestion Management Technical Report will be edited per the comment.
0001504.19	Pg. 22; right column; County congestion management program trends; 1st paragraph Requested edit: OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 2019. Orange County's latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 2019, the average AM peak-period ICU improved from 0.67 to 0.60, a ten percent improvement, and the average PM peak-period ICU improved from 0.72 to 0.63, a 12.5 percent improvement.	Thank you for your comment. Page 22 of the Congestion Management Technical Report will be edited per the comment.
0001504.20	Pg. 23; Non-recurrent congestion The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the highway non-recurrent delay discussion and Figure 11 on page 37 of the Performance Measures Technical Report.	Thank you for your comment. The non-recurrent/recurrent discussion and statistics between the Congestion Management and Performance Measures Technical Reports will be revised to be consistent.
Submitted by Orange County Transportation Authority		
0001505.01	Pg. 23; left column; Non-recurrent congestion; 2nd paragraph; 5th sentence Reconsider the statement, "This suggests that less built-out and developed areas experience more non-recurrent congestion since there is much less constant and general, predictable congestion." Orange County is generally considered to be built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.	Thank you for your comment. We will review the data depicted in Figure 4 and update Page 23 of the Congestion Management Technical Report as appropriate.
0001505.02	Pg. 31; right column; SCAG's role; 3rd paragraph; 1st sentence Replace "Los Angeles region" with "Los Angeles County"	Thank you for your comment. Page 31 of the Congestion Management Technical Report will be updated per the comment.
0001505.03	Pg. 41; left column; Ridesharing Replace "ExpressLane" with "express lane" ExpressLane is a Metro branding of the generic express lane.	Thank you for your comment. Page 41 of the Congestion Management Technical Report will be edited per the comment.
0001505.04	Pg. 41; right column; Carpooling and vanpooling Suggested edit: Carpooling is commonly defined as when two or more people share a ride...	Comment noted. Page 41 of the Congestion Management Technical Report will be edited per the comment.
0001505.05	Pg.45; left column; 1st paragraph; last sentence Clarify years	Thank you for your comment. Page 45 of the Congestion Management Technical Report will be edited per the comment.
0001505.06	Pg. 47; right column; New infrastructure Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs? Replace "appendices" with "technical reports"	Thank you for your comment. Page 47 of the Congestion Management Technical Report will be updated per the comment.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001505 Related Documents Link
0001505.07	Pg. 2; left column; last paragraph; last sentences Replace “Economic Growth” with “Economic and Job Creation Analysis”	Change made.
0001505.08	Pg. 4; left column; Forecasting process overview; 2nd paragraph Suggested edit: After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in November October 2019.	Change made.
0001505.09	Pg. 7; Table 3 Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report. Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.	The Environmental Justice Technical Report uses 5-year American Community Survey (ACS) values aggregated from census tracts to facilitate side-by-side comparisons with various Environmental Justice (EJ) geographies, whereas the Demographics & Growth Forecast Technical Report uses forecast model output. A note clarifying the difference is being added to the Environmental Justice Technical Report.
0001505.10	Pg. 18; Special focus: workplace automation and the gig economy It may be appropriate to address the implications of AB 5 here.	Thank you for your comment. While adding a comprehensive review of Assembly Bill 5 and its implications may be beyond the scope of Connect SoCal revisions, we have added a couple sentences to provide context and to suggest that recent legislative changes may impact worker classification and potential benefits received.
0001505.11	Pg. 28; Figure 11 Verify that this is labeled correctly	Verified and corrected.
0001505.12	Pg. 29; Table 13; Population Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.	The Environmental Justice Technical Report uses 5-year American Community Survey (ACS) values aggregated from census tracts to facilitate side-by-side comparisons with various Environmental Justice (EJ) geographies, whereas the Demographics & Growth Forecast Technical Report uses forecast model output. A note clarifying the difference is being added to the Environmental Justice Technical Report.
0001505.13	Pg. 42; Table 15 Priority growth areas are defined differently in the main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.	Thank you for your comment. Priority growth area definitions have been verified and updated to ensure consistency with other sections of Connect SoCal.
0001505.14	Pg. 1; right column; last paragraph Suggested edit: Over the FY2020-21 through FY2044-45 2021–2045 period, our region is expected to invest more than \$603...	Revised as suggested.
0001505.15	Pg. 5; right column; Local (neighborhood) congestion and economic competitiveness; 1st paragraph; 2nd sentence Replace “Los Angeles region” with “SCAG region”	Revised as suggested.
0001505.16	Pg. 9; Table 1 Missing fiscal year notation	Change made.
0001505.17	Pg. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1st line Replace “2021-2025” with “FY2020-21 through FY2024-25”	Change made.
0001505.18	Pg. 10; Table 2 Missing fiscal year notation	Change made.
0001505.19	Pg. 11; Table 3 Missing fiscal year notation	Change made.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001505 Related Documents Link
0001505.20	Pg. 11; right column; Total jobs resulting from the investment spending and enhanced network efficiency; 1st paragraph Replace “2021-2045” with “FY2020-21 through FY2044-45”	Change made.
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001507 Related Documents Link
0001507.01	pg. 77; Table 9; A.36; Project description and Project CostRequested edits:SRSr-57 fromFrom Lambert toTo LA La County Line - Add 1 NBNb Truck Climbing Lane\$167,550 \$124,600	Revision made.
0001507.02	pg. 77; Table 9; A.37; Project descriptionRequested edits:Add 1 HOV Hov Lane Each Direction (I-5 fromFrom SRSr -57 toTo SRSr -91)	Revision made.
0001507.03	pg. 77; Table 9; A.38; Project descriptionRequested edits:I-405 fromFrom SRSr-73 toTo I-605 - Add 1 MF Mf Lane inIn Each Direction, andAnd Additional Capital Improvements (By 2022), Convert Existing HOV Hov toTo HOT Hot. Add 1 Additional HOT Hot Lane Each Direction. Combined With Ora045, Ora151, Ora100507 And Ora120310, And Ora030605a. Signage From Pm 7.6 To 24.2.	Revision made.
0001507.04	pg. 77; Table 9; A.39; Project descriptionRequested edits:I-5 (I-405 toTo SR Sr-55) - In theThe Cities ofOf Irvine andAnd Tustin. Add 1 MF Mf Lane NBNb fromFrom Truck Bypass On Ramp toTo SR Sr-55, Add 1 MF Mf Lane SBSb fromFrom SR Sr -55 toTo Alton andAnd 1 Aux Lane fromFrom Alton toTo Truck Bypass. (Pa&Ed And Ps&E Phase) Project Will Utilize Toll Credit Match.	Revision made.
0001507.05	pg. 78; Table 9; A.40; Project descriptionRequested edits:SR Sr-91: Add 1 MF Mf Lane EBEB fromFrom SR-55 toTo SR-57, And 1 MF Mf Lane WBWb fromFrom Kraemer toTo State College; Improve Interchanges; andAnd Merge fromFrom Lakeview toTo Raymond	Revision made.
0001507.06	pg. 78; Table 9; A.41; Project descriptionRequested edits:SR Sr-91 Add 1 Lane Each Direction fromFrom SR Sr-241 toTo County Line, andAnd Other Operational Improvements. See Riverside County forFor Additional Details. (Linked withWith Riv071250b)	Revision made.
0001507.07	pg. 78; Table 9; A.42; Project descriptionRequested edits:SR Sr -57 - Add 1 MF Mf Lane NBNb Between Orangewood andAnd Katella	Revision made.
0001507.08	pg. 78; Table 9; A.43; Project descriptionRequested edits:Add 1 MF Mf Lane Each Direction fromFrom I-5 toTo SR Sr -55 andAnd Add SBSb Aux Lanes fromFrom SR-133 toTo Irv Ctr Dr	Revision made.
0001507.09	pg. 78; Table 9; Missing ProjectRequest adding missing project:Orange SR-55: Add 1 MF And 1 HOV Lane Each Direction From I-405 To I-5 And Fix Chokepoints From I-405 to I-5; Add 1 Aux Lane Each Direction Between Select On/Off Ramps and Non-Capacity Operational Improvements Through Project Limits \$410,932 S” ” denotes column breaks starting with “County” column	Thank you for your comment. SCAG will consider your request for the addition.

ID	Comment	Response
<i>Submitted by</i> Orange County Transportation Authority		Submittal 0001507 Related Documents Link
0001507.10	pg. 78; Table 9; Missing ProjectRequest adding missing project:Orange SR-74 Ortega Highway – In San Juan Capistrano From Calle Entradero To City/County Line – Widen From 2 to 4 Lanes \$77,120 M” ” denotes column breaks starting with “County” column	Thank you for your comment. SCAG will consider your request for the addition.
0001507.11	pg. 99; Exhibit 8Update map to reflect the addition of missing projects provided	Missing project labels and map will be updated.
0001507.12	pg. 1; right column; Executive summaryVerify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.	Comment noted. Consistency issues will be addressed as part of the Final Connect SoCal.
0001507.13	pg. 4; left column; Regional significanceVerify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.	Comment noted. Consistency issues will be addressed as part of the Final Connect SoCal.
0001507.14	pg. 6; Exhibit 1The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions and the Planned Express Lane Network segments on SR 55 and SR 73 as illustrated in this exhibit.Note there is a Missing Planned Express Lane Direct Connector at SR 91 / SR 241 interchange.	Comment noted. Your comment will be addressed in the Final plan.
0001507.15	pg. 20; Programmed commitmentsIt may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.	Comment noted.
0001507.16	pg. 21; Table 5Third row, replace “2023” with “2025”; replace “\$327,363” with “\$410,907”Fifth row, add the following to the Description “and southbound auxiliary lane from SR-133 to Irvine Center Drive”; replace “\$190,000” with “\$323,600”	Comment noted. Changes will be made in the Final Connect SoCal.
0001507.17	pg. 23; Exhibit 4Missing Plan Segment on I-5 between Avenida Pico and San Diego County line.Baseline Segment between El Toro and Alicia appear to be too long as mapped.	Exhibit 4 is intended for illustrative purposes only. Please refer to the Project List Technical Report for a complete list of projects.
0001507.18	pg. 24; Exhibit 5Planned HOV segment between El Toro and Alicia appears to be too long as mapped; Planned HOV segment between Avenida Pico and San Diego County line appears to be in wrong location.The OCTA Board has not taken an action on HOV-to-HOT Connector Conversions as illustrated in this exhibit.Missing Planned Mixed Flow Lanes on I-405 between I-5 and SR-55; and on I-5 between I-405 and SR-55; and on SR-57 between Orangewood and KatellaMissing Planned HOT Connector at SR-91 / SR-241 interchange.	Comment noted. Exhibit 5 is intended for illustrative purposes only. Please refer to the Final Project List Technical Report for a complete list of projects.
0001507.19	pg. 2; right column; Introduction; last sentenceVerify population value as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.	Comment noted. The correct population value is 3.7. The referenced text has been updated to address this comment.
0001507.20	pg. 7; right column; Performance and outcomes; last sentenceHow is "trend" defined for this Technical Report? Comparison to Baseline?	"Trend" refers to the "Trend/Baseline" scenario as described in the Sustainable Communities Strategy Technical Report. Appropriate edits have been made to address the comment, for clarity and consistency with the Sustainable Communities Strategy Technical Report.
<i>Submitted by</i> Orange County Transportation Authority		Submittal 0001508 Related Documents Link
0001508.01	Pg. 12; Table 4 Missing fiscal year notation	Change made.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001508 Related Documents Link
0001508.02	Pg. 12; left column; Conclusion Replace “2021-2045” with “FY2020-21 through FY2044-45”	Revised.
0001508.03	Pg. 8; right column; Ridehailing/transportation network companies (TNCs) It may be appropriate to address the implications of AB 5 here.	Thank you for your comment. While AB 5 will certainly have implications on drivers and customers of ride-hailing companies, it would be difficult to do much more than theorize how it might affect public-private partnerships. However, we are committed to help guide our member agencies to make regulation and partnership decisions that are provably beneficial to both labor and the public at large, including people who choose not to use ride-hailing services.
0001508.04	Pg. 5; Table 1; Neighborhood change and displacement Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.	Suggested revision is addressed in the Final Plan.
0001508.05	Pg. 7; Table 1; Rail-related impacts Asterisks but no corresponding note.	Corrections will be addressed in the Final Environmental Justice Technical Report.
0001508.06	Pg. 7; Table 1; Impacts from mileage-based user fee Suggest including local road charge program here—which, should be a similar impact—and not just mileage-based user fee.	Thank you for your comment. This impact assessment more broadly applies to all mileage-based user fee programs, including the local road charge program.
0001508.07	Pg. 14; left column; Where should impacts be assessed?; last bullet This should also include the local road charge program.	Thank you for your comment. This impact assessment more broadly applies to all mileage-based user fee programs, including the local road charge program.
0001508.08	Pg. 19; left column; How will impacts be analyzed?; 2nd paragraph; last sentence Clarify if this is different than the Baseline definition used elsewhere in the Plan.	Comment noted. The baseline definition is consistent with other technical reports in the Plan.
0001508.09	Pg. 20; Table 5 Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.	In order to facilitate side-by-side comparison of the region and three separate tract-level Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the EJ Technical Report uses tract-level Census and ACS estimates as the best available approximation of 2000, 2010, and 2016 conditions. Table 5 data is aggregated from tract-level information in order to facilitate comparison with EJ geographies found in subsequent tables and may not sum to regional totals. Additionally, county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report.
0001508.10	Pg. 21; left column; Historical demographic trends; 2nd paragraph Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report. Define senior population.	In order to facilitate side-by-side comparison of the region and three separate Environmental (EJ)-related overlays across a wide variety of socioeconomic variables, the EJ Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001508 Related Documents Link
0001508.11	<p>Pg. 21; right column; Historical demographic trends; 2nd paragraph; last sentence</p> <p>Explain why the travel demand model predicts a future that is inconsistent with the trend.</p>	<p>Thank you for your comment. SCAG's forecast of population, households, and employment at the small-area level generate secondary variables such as these which are required inputs for the travel demand model. These secondary variables are not independently derived and forecasted due to their limited purpose. Their inclusion in the Environmental Justice Technical Report is to provide an improved illustration of historical trajectories and their inherent limitations are noted.</p>
0001508.12	<p>Pg. 23; Table 7; Total population Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.</p>	<p>In order to facilitate side-by-side comparison of the region and three separate Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the EJ Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report.</p>
0001508.13	<p>Pg. 24; left column; Demographic trends in EJ areas in the SCAG region; 1st paragraph</p> <p>Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.</p>	<p>In order to facilitate side-by-side comparison of the region and three separate Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the EJ Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report. Specifically, Table 5 of this report indicates a 68.6% share of population other than White, non-Hispanic in 2016 while the Demographics & Growth Forecast Technical Report indicates a 68.5% share (Table 3).</p>
0001508.14	<p>Pg. 26; left column; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.</p>	<p>In order to facilitate side-by-side comparison of the region and three separate Environmental Justice (EJ)-related overlays across a wide variety of socioeconomic variables, the EJ Technical Report uses ACS 2013-2017 5-year estimates as the best available approximation of 2016 conditions. The county-level figures in the Demographics and Growth Forecast Technical Report may differ slightly as they are outputs from SCAG's county-level cohort component forecast model which, since it has a different purpose, relies on different input data and modeling assumptions which are detailed in that report. Specifically, Table 5 of this report indicates a median age in 2016 of 35.6 from the ACS compared to 35.8 in the Demographics & Growth Forecast Technical Report (Table 3).</p>
0001508.15	<p>Pg. 30; left column; Expected future trends in EJ geographies; 2nd paragraph; last sentence</p> <p>Explain why the travel demand model assumes a decrease in poverty.</p>	<p>Thank you for your comment. SCAG's forecast of population, households, and employment at the small-area level generate secondary variables such as these which are required inputs for the travel demand model. These secondary variables are not independently derived and forecasted due to their limited purpose. Their inclusion in the Environmental Justice Technical Report is to provide an improved illustration of historical trajectories and their inherent limitations are noted.</p>

ID	Comment	Response
Submitted by Orange County Transportation Authority		
0001508.16	Pg. 30; left column; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence Explain why the travel demand model predicts a future that is inconsistent with the trend.	Submittal 0001508 Related Documents Link Thank you for your comment. SCAG's forecast of population, households, and employment at the small-area level generate secondary variables such as these which are required inputs for the travel demand model. These secondary variables are not independently derived and forecasted due to their limited purpose. Their inclusion in the Environmental Justice Technical Report is to provide an improved illustration of historical trajectories and their inherent limitations are noted.
0001508.17	Pg. 45; left column; Results; 2nd paragraph; 1st sentence Clarify end of sentence—"...future Technical Report."	Clarifications will be addressed in the Final Environmental Justice Technical Report.
Submitted by Orange County Transportation Authority		
0001510.01	pg. 16; right column; Orange County Central-Coastal NCCP/HCPReplace "Transportation Corridor Agency" with "Transportation Corridor Agencies"	Submittal 0001510 Related Documents Link Comment noted. Appropriate edits have been made in the Plan to address the comment.
0001510.02	pg. 2; right column; Importance to the regional transportation system; 2nd paragraphVerify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.	Thank you for your comment. The referenced route mile figure in the Passenger Rail Technical Report is correct.
0001510.03	pg. 4; right column; Regional; 1st paragraphVerify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.	Thank you for your comment. The referenced route mile figure in the the Passenger Rail Technical Report is correct.
0001510.04	pg. 5; left column; Modeling approach and ridership forecasting; 1st paragraph; last sentenceClarify this statement, "In the horizon year, the full buildout of the Metrolink SCORE project is assumed." It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.	Thank you for your comment. Page 5 of the Passenger Rail Technical Report will be updated per the comment.
0001510.05	pg. 6; left column; Connectivity and gaps in service; 1st paragraphIt is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.	Comment noted. There are several stations along the LOSSAN Corridor that are served by Metrolink but not the Amtrak Pacific Surfliner as the Surfliner is an inter-city rail service.
0001510.06	pg. 8; right column; The Southwest ChiefProvide applicable updates on replacement of rail service with charter bus service.	Thank you for your comment. The Passenger Rail Technical Report will be updated per your comment.
0001510.07	pg. 9; right column; Metrolink; 1st paragraphVerify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.	Thank you for your comment. The referenced route mile figure in the Passenger Rail Technical Report is correct.
0001510.08	pg. 11; Exhibit 2It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.	Thank you for your comment. Exhibit 2 will be edited to remove the future Placentia Metrolink station.
0001510.09	pg. 14; left column; Palmdale to Hollywood Burbank AirportDefine "SAA"	Thank you for your comment. Page 14 of the Passenger Rail Technical Report will be updated per the comment.
0001510.10	pg. 14; right columnProvide applicable updates on draft and final EIR/EIS documents. Text indicates that draft documents would be released in late 2019.	Thank you for your comment. This section will be updated with current EIR/EIS dates available from the California High-Speed Rail Authority.
0001510.11	pg. 25; Exhibit 5It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.	Thank you for your comment. Exhibit 5 will be edited to remove the future Placentia Metrolink station.

ID	Comment	Response
<i>Submitted by</i> Orange County Transportation Authority		Submittal 0001510 Related Documents Link
0001510.12	pg. 26; right column; Placentia Metrolink StationProvide applicable update on start of construction.	Thank you for your comment. Page 26 of the report will be updated if construction start dates are available.
0001510.13	pg. 35; Exhibit 7It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.	Thank you for your comment. Exhibit 7 of the Passenger Rail Technical Report will be edited per the comment.
0001510.14	pg. 36; Exhibit 8It appears that the future Placentia Metrolink Station is included here as an Existing Metrolink Station.	Thank you for your comment. Exhibit 8 of the Passenger Rail Technical Report will be edited per the comment.
0001510.15	pg. 14; right column; Analytical approach; 2nd bulletSuggest revising language to reflect definition of Baseline from Glossary of the main book.	Thank you for taking the time to review and comment on the draft Connect SoCal. The definition of 'Baseline' provided in the Performance Measurers chapter will be reviewed to ensure consistency with the Connect SoCal Glossary.
0001510.16	pg. 51; Table 16Suggest revising title to reflect criteria pollutant emission reductions	Thank you for your comment. The title of Table 16 in the Connect SoCal Performance Measures Technical Report will be revised from 'Criteria Pollutant Emissions' to 'Criteria Pollutant Emissions Reduction.'
0001510.17	pg. 57; Table 20Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.	Thank you for your comment. The values presented for active transportation mode share in Table 20 of the draft Connect SoCal Performance Measures Technical Report will be reviewed to ensure consistency with other sections of Connect SoCal.
0001510.18	pg. 58; Table 20Replace "0.0%" with "N/A" for Trend for GHG emission reductions.Missing footnote for asterisks for Baseline GHG emissions.Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.	Thank you for your comments. Your recommended edits for Table 20 will be reviewed and applied as appropriate.
0001510.19	pg. 140; Table 2Request adding missing project:Transit Anaheim Transportation Network (ATN) RTP ID to be determined by SCAG 0 Fixed Route Bus Replace 40 LNG buses that have exceeded their useful life with advanced battery-electric buses and increase service levels, including two new routes. 2021 \$34,146" " denotes column breaks	Comment noted. The requested revisions have been incorporated into the Connect SoCal Project List Technical Report.
0001510.20	pg. 239-242; Table 2Request including asterisk to each of the regional initiatives with the following note, "Regional initiatives are assumed to be funded by reasonably available new revenue sources and innovative financing strategies included in Connect SoCal."	Comment noted.
<i>Submitted by</i> Orange County Transportation Authority		Submittal 0001512 Related Documents Link
0001512.01	pg. 2; right column; Executive summary; 1st paragraphSuggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and the main book.	Comment noted. The Public Health Technical Report has been updated.
0001512.02	pg. 2; right column; Executive summary; 1st paragraphSuggest reference to Baseline definition in Glossary of the main book	Comment noted. The Public Health Technical Report has been updated.
0001512.03	pg. 2; right column; Executive summary; 2nd paragraphVerify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and the main book.	Comment noted. The Public Health Technical Report has been updated.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001512 Related Documents Link
0001512.04	pg. 45; Table 5Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with the main book.Verify Baseline and Plan values for criteria pollutants as it appears to be inconsistent with the main book. What unit are the criteria pollutant emissions shown?	Comment noted. The Public Health Technical Report has been updated.
0001512.05	pg. 46; Table 5Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.	Comment noted. The Public Health Technical Report has been updated.
0001512.06	pg. 49; Table 8Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with the main book.	Comment noted. The Public Health Technical Report has been updated.
0001512.07	pg. 52; right column; Table 10Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with the main book. What unit are the criteria pollutant emissions shown?	Comment noted. The Public Health Technical Report has been updated.
0001512.08	pg. 56; left column; Table 12Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with the main book.	Comment noted. The Public Health Technical Report has been updated.
0001512.09	pg. 3; Table 1Suggest combining information from applicable rows, such as “Facebook” (rows 1 and 8) where the same engagement tool is listed in multiple rows.	Comment noted. Suggested edits will be addressed in the Final Connect SoCal.
0001512.10	pg. 7; right column; Outdoor advertising; last sentenceReplace “seven-county” with “six-county”	Comment noted. Referenced edits will be addressed in the Final Connect SoCal.
0001512.11	pg. 9-10; Tables 6-9Suggest adding a column to each table to show the regional share of each participant group. This would help illustrate if the survey results are representative of the general population.	Comment noted. The regional share of the survey results of those individuals who answered is located on Table 6 on page 9 the Public Participation and Consultation Technical Report.
0001512.12	pg. 11; left column; Stakeholder working groups; 2nd paragraphReplace “Natural Land Conservation” with “Natural & Farm Lands Conservation”	Comment noted. The referenced edit will be addressed in the final Plan.
0001512.13	pg. 11; right column; Active transportation working group; 1st paragraphThe 2016 RTP/SCS included a capital project investment level of \$8.1 billion plus \$4.8 billion from operations and maintenance of regionally significant local streets and roads for combined total of \$12.9 billion for active transportation improvements.	Comment noted.
0001512.14	pg. 12; right column; Mobility innovationsIndicate the number of meetings and dates held to be consistent with other working groups.	Thank you for your comment. The Public Participation and Consultation Technical Report will be updated with the meeting dates.
0001512.15	pg. 13; right column; Sustainable communitiesIndicate the number of meetings and dates held to be consistent with other working groups.	Comment noted. The Sustainable Communities working group met four times on the following dates: 5/17/18, 8/9/18, 11/15/19, 2/21/19. The Plan will be updated to reflect this information.
0001512.16	pg. 5; right column; Recent growthVerify values listed as they appear to be inconsistent with the main book and the Demographics and Growth Forecast Technical Report.	Comment noted. The referenced text has been amended to reflect similar priority areas and corresponding growth statistics.
0001512.17	pg. 24-29; Exhibits 1-6Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.	Thank you for your comment. The 2016 Urban Rail coloring will be changed to match the 2045 color, in the referenced exhibits.

ID	Comment	Response
<p><i>Submitted by</i> Orange County Transportation Authority Submittal 0001512 Related Documents Link</p>		
0001512.18	pg. 76; left column; Planned HQTCS; 2nd paragraphReplace “V4” with “Exhibit 14”	Thank you for your comment. Page 76 of the Transit Technical Report will be updated per the comment.
0001512.19	pg. 84; Planned HQTCS and major transit stops; left column; last lineReplace “V4” with “Exhibit 14”	Thank you for your comment. Page 84 of the Transit Technical Report will be edited per the comment.
0001512.20	pg. 21; right column; Connect SoCal No BuildCorrect years of FTIP.	The referenced typos have been corrected in the final Plan.
<p><i>Submitted by</i> Orange County Transportation Authority Submittal 0001514 Related Documents Link</p>		
0001514.01	pg. 44; left column; 2007 Ozone SIP; last lineRevise reference for more information on TCMs and timely implementation of TCMs.	The reference is not necessary and thus is deleted in the final Plan.
0001514.02	pg. 86-91; Table 65ORA050, ORA051, and 10254 should reflect a completion delay to year 2022 and that obstacles are being overcome.	The final Plan will reflect that the completion year for the three projects will be extended to 2022 pending justifications for the delay, project status, and efforts to overcome the delay from the Orange County Transportation Authority (OCTA).
0001514.03	pg. 9; Table 2; Local road charge programs the local road charge program indexed to maintain purchasing power?	The local road charge program is indexed to inflation to maintain purchasing power.
0001514.04	pg. 10; Table 3.1; Local option sales tax measureLos Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.	Comment noted.
0001514.05	pg. 10; Table 3.1; Highway tollsSuggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.	Comment noted.
0001514.06	pg. 25; Table 8Asterisk on “active transportation” should be moved to “regionally significant local streets and roads”	Thank you for your comment. We have incorporated your suggestion.
0001514.07	pg. 38; left column; Local road charge programs the local road charge program indexed to maintain purchasing power?	The local road charge program is indexed to inflation maintain purchasing power.
0001514.08	pg. 29; left column; Reduce aggressive driving and speedingSuggested edit:Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on FIGURE 9 the table. and below are some strategies SCAG recommends local jurisdictions to implement strategies that could reduce fatalities and serious injuries relate dot related to aggressive driving and speeding, which could include, but are not limited to: <ul style="list-style-type: none"> •Local jurisdictions should Conducting public outreach... •Local jurisdictions should Identifying locations with... •Local jurisdictions should Promoting best engineering... •Local jurisdictions should Setting speed limits that are safe... 	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.09	pg. 29; right column; Improve safety for aging populationsSuggested edit:SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, which could include, but are not limited to: <ul style="list-style-type: none"> •Local jurisdictions should Supporting roadway, intersection... •Local jurisdictions should Promoting implementation of... •Local jurisdictions should Implementing design treatments... •Local jurisdictions should Working with Transit network... •Local jurisdictions should Establishing Safe Routes for ...” 	Comment noted. The Transportation Safety & Security Technical Report has been updated.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001514 Related Documents Link
0001514.10	<p>pg. 30; left column; Improve bicyclist safetySuggested edit:SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, which could include, but are not limited to:•Local jurisdictions should Supporting connecting bicycle... •Local jurisdictions should Developing and implement...•Local jurisdictions should Adopting Complete Streets... •Local jurisdictions should Implementing pedestrian and...•Local jurisdictions should Using intersection control... •Local jurisdictions should Conducting bicycle education...•Local jurisdictions should Supporting expanding Safe...•Local jurisdictions should Utilizing SCAG’s ... •Local jurisdictions should Implementing traffic calming... •Local jurisdictions Where applicable, should developing a...•Local jurisdictions should Participating in programs to...</p>	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.11	<p>pg. 31; left column; Improve commercial vehicles safetySuggested edit:SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, which could include, but are not limited to:•Local jurisdictions should Supporting the use of dedicated... •Local jurisdictions should Identifying intersections and... •Local jurisdictions should Identifying and promote the...•Local jurisdictions should Identifying rest stops along...</p>	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.12	<p>pg. 32; left column; Reduce distracted drivingSuggested edit:SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, which could include, but are not limited to:•Local jurisdictions should Developing enforcement and... •Local jurisdictions should Improving data quality on... •Local jurisdictions should Conducting education on the...</p>	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.13	<p>pg. 32; right column; Ensure drivers are licensedSuggested edit:SCAG recommends the following strategies for local jurisdictions to ensure drivers are properly licensed, which could include, but are not limited to:•Local jurisdictions should Improving educational...•Local jurisdictions should Creating a public...•Local jurisdictions should Supporting the State...</p>	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.14	<p>pg. 32; right column; Improve emergency response servicesSuggested edit:SCAG recommends the following strategies for local jurisdictions to improve emergency response services, which could include, but are not limited to:•Local jurisdictions should Using Intelligent...•Local jurisdictions should Developing guidance...</p>	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.15	<p>pg. 34; left column; Improve research and data collectionSuggested edit:SCAG recommends the following strategies for local jurisdictions to improve research and data collection, which could include, but are not limited to:•Local jurisdictions should Improving data collection...•Local jurisdictions should Identifying high injury...•Local jurisdictions should Working with the State...•Local jurisdictions should Working with transit network...</p>	Comment noted. The Transportation Safety & Security Technical Report has been updated.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001514 Related Documents Link
0001514.16	pg. 34; left column; Reduce impaired driving fatalitiesSuggested edit:SCAG recommends the following strategies for local jurisdictions to reduce impaired driving fatalities and injuries, which could include, but are not limited to:•Local jurisdictions should Promoting and expand...•Local jurisdictions should Extending and promote...•Local jurisdictions should Developing a methodology...•Local jurisdictions should Developing and distribute...•Local jurisdictions should Designing and develop a...•Local governments should Improving enforcement...•Local jurisdictions should Increasing frequency,...	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.17	pg. 35; left column; Improve safety at intersectionsSuggested edit:SCAG recommends the following strategies for local jurisdictions to improve safety at intersections which could include, but are not limited to:•Incorporating intersection safety into the planning grant strategy.•Local jurisdictions should Incorporating Intelligent... •Local jurisdictions should Implementing infrastructure... •Local jurisdictions should Implementing installation of... •Local jurisdictions should Planning for, and develop... •Local jurisdictions should Reducing modal conflicts at...	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.18	pg. 35; left column; Reduce the occurrence of lane departure fatalitiesSuggested edit:SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, which could include, but are not limited to:•Local jurisdictions should Continuing the deployment...•Local jurisdictions should Addressing systemic risks...•Local jurisdictions should Improving the dissemination...•Local jurisdictions should Targeting highest risk...•Local jurisdictions should Implementing an effective...•Local jurisdictions should Promoting the use of...	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.19	pg. 36; right column; Improve motorcycle safetySuggested edit:SCAG recommends the following strategies for local jurisdictions to improve motorist safety, which could include, but are not limited to:•Local jurisdictions should Working with the state...•Local jurisdictions should Working with local governments...•Local jurisdictions should Promoting the most significant...	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001514.20	pg. 37; left column; Improve occupant protection by increased use of seat belts and child safety seatsSuggested edit:SCAG recommends the following strategies for local jurisdictions to improve occupant protection, which could include, but are not limited to:•Local jurisdictions should Increasing enforcement and...•Local jurisdictions should Implementing education...•Local jurisdictions should Promoting the establishment...•Local jurisdictions should Improving occupant protection...	Comment noted. The Transportation Safety & Security Technical Report has been updated.

ID	Comment	Response
<i>Submitted by</i>	Orange County Transportation Authority	Submittal 0001516 Related Documents Link
0001516.01	<p>pg. 37; right column; Improve pedestrian safety Suggested edit:SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, which could include, but are not limited to:.</p> <ul style="list-style-type: none"> •Continuing to work with local jurisdictions to provide a... •Local jurisdictions should Developing pedestrian safety... •Local jurisdictions should Ensuring all sidewalks and... •Local jurisdictions should Supporting improvements to... •Local jurisdictions should Considering pedestrian needs in... •Local jurisdictions should Facilitating the planning... •Local jurisdictions should Increasing pedestrian crossing... •Local jurisdictions should Incorporating pedestrian... •Local jurisdictions should Participating in programs... •Local jurisdictions should Improving pedestrian striping... •Local jurisdictions should Incorporating median... •Local jurisdictions should Considering installation of... •Local jurisdictions should Developing citywide Safe... •Local jurisdictions should Continuing to improve... 	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001516.02	<p>pg. 38; left column; Improve work zone safety Suggested edit:SCAG recommends the following strategies for local jurisdictions to improve work zone safety, which could include, but are not limited to:.</p> <ul style="list-style-type: none"> •Local jurisdictions should Improving safe driving... •Local jurisdictions should Applying advanced technology ... •Local jurisdictions should Improving work zone data... 	Comment noted. The Transportation Safety & Security Technical Report has been updated.
0001516.03	<p>pg. 38; right column; improve safety for young drivers Suggested edit:SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, which could include, but are not limited to:.</p> <ul style="list-style-type: none"> •Local jurisdictions should Establishing a task force to... •Local jurisdictions should Implementing the Driver... •Local jurisdictions should Supporting state authorities... •Local jurisdictions should Implementing and maintain... •Local jurisdictions should Establishing efforts to address... 	Comment noted. The Transportation Safety & Security Technical Report has been updated.

ID	Comment	Response
<i>Submitted by</i>	Public Health Alliance of Southern California	Submittal 0001383 Related Documents Link
0001383.01	<p>Every 4 years, we are pleased to see SCAG make considerable progress on better incorporating public health, health equity and climate change into its Plan. This draft Plan represents a transformative shift in our region’s transportation investments to create healthier, more equitable, and climate resilient communities. We are pleased to see that the plan does the following: Takes a Health in All Policies approach to Public Health, focusing on the social determinants of health and integrating public health considerations into all elements of the Plan. Includes overarching goals focused on improving public health (Goal #6, Support healthy and equitable communities) and addressing climate change (Goal #7, Adapt to a changing climate and support an integrated regional development pattern and transportation network”) Invests almost double the amount of funding in active transportation (\$22.5 billion) compared to the previous plan (\$12.9 billion). These additional investments in walking and bicycling infrastructure and programs will have a significant impact on our region’s health and well-being. Projects increasing active transportation mode share from 8.3% to 10.2% by 2045. Continues support for non-infrastructure active transportation programs such as Go Human, Safe Routes to School and local transportation safety efforts, both in-house at SCAG and in the region’s local health departments and other government agencies. Meets the greenhouse gas emissions reductions targets established for the region by Senate Bill 375 (8% in 2020, 19% in 2035) and reduces vehicle miles traveled per capita by 4.5%. Provides quantifiable performances of health impacts from implementing the Plan by 2045, including health care cost savings (\$350 million for chronic disease related incidences, \$138 million for air quality-related incidences), reduced incidences of chronic disease (80,000 combined cases for high blood pressure, heart disease and type 2 diabetes), active transportation mode share (22% increase in walking and 50% increase in biking), and air quality improvements (3.8% reduction in PM2.5 emissions) . Includes a robust Public Health Technical Report with robust data on how the Plan will improve health outcomes, including baseline data and projections to 2045.</p>	Thank you for your comments. Comments noted.
0001383.02	<p>Provides a strong list of actionable strategies for local communities to elevate public health, equity and climate change in their planning efforts. The Alliance worked with SCAG staff through its participation in the Public Health Working Group to refine these strategies and are pleased to see our recommendations have been incorporated. Provides an inventory of local communities that have created plans with a strong public health framing, as well as those that have created active transportation plans. This will be a highly useful resource to our local health departments and partners in ensuring we are coordinated in our planning and where we could fill important gaps. Utilizes the Alliance’s California Healthy Places Index in multiple sections, including maps of the region showing HPI scores, life expectancy, the social determinants of health and specific chronic disease rates.</p>	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	Public Health Alliance of Southern California	Submittal 0001383 Related Documents Link
0001383.03	<p>While we are encouraged by all of the above, the Plan could be strengthened in the following ways: Incorporating the California Healthy Places Index (HPI) in Additional Sections of the Plan. The California Healthy Places Index (HPI), available at www.healthyplacesindex.org, is a data and mapping tool developed by the Alliance that allows users to explore underlying local factors associated with life expectancy and to compare community conditions statewide, at multiple geographies down to the Census tract level. The HPI provides overall scores for communities and more detailed data on specific policy action areas that address the social determinants of health, such as housing, economic opportunity, education, transportation, neighborhood characteristics, and more. The HPI is currently used by nearly 90 agencies, businesses and community groups using HPI to integrate public health into their work, and more than \$450 million in funding has been made available for regional and State grant programs using HPI, including SCAG as part of its SCAG's own Sustainable Communities Grants application. We are encouraged to see maps and data from HPI in several sections of the Plan, including the Active Transportation Technical Report, and have been encouraged by SCAG using HPI as part of its Sustainable Communities Planning Grant selection criteria. However, the Public Health Technical Report only includes a mention of HPI on page 13 without use of the data in any tables, maps or other visualizations like other datasets. Given the Plan's focus on the social determinants of health and health equity, we recommend incorporating HPI score maps, as well as maps of several of the indicators and decision support layers that represent the social determinants of health that are the focus of the Public Health Technical Report, such as housing (Housing Policy Action Area indicators), air quality (Environment Policy Action Area indicators), economic opportunity (Economic Policy Action Area indicators) and Climate Change (Climate Vulnerability decision support layers). We also recommend adding tables with additional public health information available in HPI to the Technical Report. This will ensure that the implementers of this Plan have a wide range of information available as they consider public health and health equity impacts of their decision-making in the region.</p>	<p>Comment noted. SCAG values the utility of the California Healthy Places Index (HPI) tool for local, regional, and state government agencies, as well as community groups. Throughout the Public Health Technical Report, whenever possible, SCAG utilized data tied to the base year of the plan, 2016. This limited the usage of HPI data. HPI is highlighted as an important statewide initiative and resource. To reinforce the tool's value, the report has been updated to include a map that reflects HPI scores across the region. In the next Plan, SCAG hopes to utilize more HPI data.</p>

ID	Comment	Response
<i>Submitted by</i>	Public Health Alliance of Southern California	Submittal 0001383 Related Documents Link
0001383.04	<p>HPI scores should be added as an additional “Environmental Justice Area” in the Environmental Justice Technical Report. HPI scores are available at similar geographies to these existing maps and can provide an additional health equity lens to the Environmental Justice analysis and help with identification of disadvantaged communities and where cities and counties in the region should be prioritizing investments to address environmental justice issues that intersect with health equity issues. We also recommend reviewing and incorporating the strategies and policies identified in the 30 HPI Policy Action Guides in several sections: the Environmental Justice Toolbox, which is lacking many examples from a public health and health equity perspective, as well as the Strategies sections of Active Transportation and Public Health Technical Reports.</p>	<p>Comment noted. SCAG values the utility of the California Healthy Places Index (HPI) tool for local, regional, and state government agencies, as well as community groups. Throughout the Plan's technical reports, whenever possible, SCAG utilized data tied to the base year of the plan, 2016. This limited the usage of HPI data. Within the Public Health Technical Report, HPI is highlighted as an important statewide initiative and resource. To reinforce the tool's value, this Report has been updated to include a map that reflects HPI scores across the region, similar to what is included in the Active Transportation Technical Report. In the next Plan SCAG hopes to be able to utilize more HPI data. SCAG staff will also evaluate HPI and its feasibility to be included in future EJ Technical Reports. However, the EJ Technical Report is focused on certain communities within the region, specifically areas with low-income and minority populations that tend to experience higher exposure and concentration of adverse environmental impacts than the general population. The EJ performance indicators address topic areas similarly looked at in the HPI tool like access to employment, shopping (e.g., grocery stores), and parks/natural lands; the availability of transportation options (e.g., bikeways, transit, etc.); transportation safety; and exposure to emissions (i.e., clean air). The HPI Policy Action Guides will also be added as a resource in the EJ Toolbox and further explored in future EJ Toolboxes.</p>

ID	Comment	Response
<i>Submitted by</i>	Public Health Alliance of Southern California	Submittal 0001383 Related Documents Link
0001383.05	<p>Greater Alignment of the Environmental Justice Technical Report with Other Parts of the Plan The performance measures in the Environmental Justice Technical Report should provide quantifiable targets like the rest of the Plan, instead of directional measures of “Improve” or qualitative descriptions. We appreciate the inclusion of the General Plan Elements (GPE) discussion and icons throughout the Environmental Justice Technical Report to support the SB 1000 requirement. However, in order to support progress and alignment throughout the SCAG region, we recommend including a strategy that outlines a process for cities and counties to amend their General Plans to reflect the goals and strategies in Connect SoCal, especially those in the Environmental Justice Technical Report. This will ensure greater consistency between local and regional plans, which is often a requirement for State grant funding. The Environmental Justice Technical Report should more explicitly align with other sections of the Plan that focus on equity. For example, the Public Health Technical Report focuses on the Social Determinants of Health yet these are barely mentioned in the Environmental Justice Technical Report. In order to promote greater coordination and collaboration between the practitioners and stakeholders who will ultimately be responsible for implementing this plan, these sections should be better aligned and reflect the data, strategies, goals and other elements identified in each section.</p>	<p>Comment noted. Environmental justice (EJ) performance targets are discussed in the Connect SoCal Chapter 5: Measuring Our Progress and the Performance Measures Technical Report to evaluate regional performance on matters of social equity and disproportionate impacts. Per federal and state requirements, SCAG is required to conduct an EJ analysis on the Plan to ensure that there are no disproportionately high adverse impacts occurring in low income or minority populations. Due to the size of the SCAG region, the 18 EJ performance indicators covers issues in most, if not all, jurisdictions in the region. The goal of the Environmental Justice (EJ) Technical Report is to provide insightful information, support the development of Connect SoCal, and to collaborate with stakeholders. The goals and objectives of the EJ report are aligned with Connect SoCal. In addition, the EJ Toolbox can provide recommended practices and approaches for stakeholders to utilize when incorporating EJ-related strategies in their General Plans. SCAG welcomes local jurisdictions to collaborate with SCAG when updating their General Plans for better consistency between local and regional plans. SCAG is in the process of developing a tool to assist local jurisdictions to update General Plans with relevant data--this is a great way to provide assistance and collaboration. The Environmental Justice (EJ) Technical Report is focused on certain communities within the region, specifically areas with low-income and minority populations that tend to experience higher exposure and concentration of adverse environmental impacts than the general population. Though the EJ Technical Report does not explicitly reference the Social Determinants of Health, several of the EJ performance indicators address them, including: access to employment, shopping (e.g., grocery stores), and parks/natural lands; the availability of transportation options (e.g., bikeways, transit, etc.); transportation safety; and exposure to emissions (i.e., clean air). The Public Health Technical Report presents an overview of health outcomes for all populations in the SCAG region as they relate to the built environment and the plan’s anticipated impacts. The analysis from both technical reports contributed to the development of Connect SoCal’s multimodal transportation and land use strategies that present numerous opportunities to ensure investments result in equitable health outcomes and benefit all populations in the region.</p>

ID	Comment	Response
<i>Submitted by</i>	Public Health Alliance of Southern California	Submittal 0001383 Related Documents Link
0001383.06	<p>As mentioned above, data from the California Healthy Places Index, as well as the California Department of Public Health’s Climate and Health Vulnerability Indicators should be incorporated in this section when discussing public health and climate vulnerability, respectively. Currently, only CalEnviroScreen 3.0 is used to analyze these topics, which is inconsistent with the reference to the California Healthy Places Index and Climate and Health Vulnerability Indicators in with the Public Health, Active Transportation and other sections of the Plan. In order to improve the readability of the Technical Report we recommend greater clarity between the narrative and summary statements and the specific data tables. For example, the narrative on page 3 states “regional and local emissions impact shows adverse impacts at the local level for certain regions but improvements at a regional level,” however Table 1 Emissions Impact Analysis appears to show improvement for all EJ areas, it is unclear whether the adverse impacts at the local level are due to freeway and roadway exposure or not. Similarly, the Technical Report narrative states that “EJ communities incur a higher risk of adverse impacts for active transportation hazards, climate vulnerability and public health,” but the summary in Table 1 only provides narrative on current conditions for these topics. We recommend adding detail on specific geographic areas where these impacts will occur, and providing a clearer understanding on the connection between the Plan components and any potential negative outcomes for EJ communities. In order to provide additional clarity on the findings on emissions impacts, the Technical Report could include more narrative to explain the findings in Tables 41-44; in one section the analysis states “COC areas show less improvement in CO and PM2.5 compared to the region,” however page 123 says there will be areas that experience increases in PM 2.5 and CO emissions due to the plan. We recommend including additional narrative to clarify the issue.</p>	<p>Comment noted. The Environmental Justice (EJ) Technical Report is focused on certain communities within the region, specifically areas with low-income and minority populations that tend to experience higher exposure and concentration of adverse environmental impacts than the general population. Though the EJ Technical Report does not explicitly reference the Social Determinants of Health, several of the EJ performance indicators address them, including: access to employment, shopping (e.g., grocery stores), and parks/natural lands; the availability of transportation options (e.g., bikeways, transit, etc.); transportation safety; and exposure to emissions (i.e., clean air). The Public Health Technical Report presents an overview of health outcomes for all populations in the SCAG region as they relate to the built environment and the plan’s anticipated impacts. The analysis from both technical reports contributed to the development of Connect SoCal’s multimodal transportation and land use strategies that present numerous opportunities to ensure investments result in equitable health outcomes and benefit all populations in the region. The narrative describing the summary table (Table 1) of the Environmental Justice (EJ) Technical Report has been revised to provide additional details consistent with the table. SCAG staff has also revised the text in the Emissions Impacts Analysis section of the EJ report to provide additional explanation about the findings.</p>
0001383.07.1	<p>Elevated Discussion of Climate Change We are pleased to see an elevated focus on climate change compared to the last Plan. However, we recommend that SCAG consider creating a standalone Technical Report devoted to Climate Change in order to provide specific data and strategies for addressing climate change in the SCAG region. Review and incorporation of jurisdiction climate action plans, climate adaptation plans, and/or sustainability plans may help guide the development of a Climate Change Technical Report. In addition, the discussion of climate change focuses on a narrow set of climate-related events such as wildfires and sea level rise. These discussions could benefit from a broader focus on climate adaptation and resilience, especially how they relate to the changing demographics of the region.</p>	<p>Thank you for your comment. Currently SCAG is finalizing its Regional Climate Adaptation Framework, which will include a Regional Gap Analysis report that identifies regional and local examples of climate adaptation and resilience efforts, as well as implementation gaps. For instance, not all critical infrastructure (e.g. hospitals, power facilities, schools, sewer plants, etc.) have completed or implemented adaptation plans to protect that facility from the effects of climate change. To support this work, SCAG convenes stakeholders via a Climate Adaptation and Resilience Working Group. SCAG anticipates sharing climate adaptation-related tools and toolkits with stakeholders in the summer 2020. This current work will inform SCAG’s future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, including an emphasis on adaptation and resilience, and the connection to public health and vulnerable populations, in the next plan.</p>

ID	Comment	Response
<i>Submitted by</i>	Public Health Alliance of Southern California	Submittal 0001383 Related Documents Link
0001383.07.2	<p>In the Public Health Technical Report under the Climate Change Expanded Analysis Section there should be greater emphasis on the importance of active transportation and public transit accessibility as a community climate resilience and health equity strategy, not solely as a climate mitigation strategy (via VMT reduction). Additionally, we recommend the inclusion of an analysis of the potential cost savings of more resilient active transportation and public transit systems in the projected climate scenarios. In order to further address the nexus between public health, regional transportation plans, and climate change, we recommend explicitly addressing the public health risks of active transportation modes during extreme heat events, poor air quality days, and wildfire season. Similarly, we recommend including consideration of the importance of transportation needs, especially evacuation protocols, of vulnerable populations (e.g. elderly, disabled, socially isolated) during a climate- related event.</p>	<p>Comment noted. SCAG recognizes the importance of active transportation and transit for public health, and that is why the Public Health Technical Report includes strategies and actions for local jurisdictions and partners for advancing the use and access to these modes. For example, the Report includes Strategy 4: Support implementation of transit oriented communities, mixed land uses, green streets strategies, and safe streets for all ages and abilities to maximize opportunities for active lifestyles and access to essential services, and promote increased rates of transit and active transportation to improve air quality. SCAG also acknowledges the need for continuing analyses related to climate change mitigation, adaptation, and resilience.</p>
0001383.08.1	<p>In order to increase the emphasis on the climate adaptation and resilience, we recommend including current regional, local, and community-based climate resilience efforts within the Existing Conditions section, specifically the sub-sections that are directly related to climate change (e.g. Access to Parks and Open Space, Air Quality, Smoke and Wildfires, etc.).</p>	<p>Comment noted. Currently SCAG is finalizing its Regional Climate Adaptation Framework, which will include a Regional Gap Analysis report that identifies regional and local examples of climate adaptation and resilience efforts, as well as discusses implementation gaps. For instance, not all critical infrastructure (e.g. hospitals, power facilities, schools, sewer plants, etc.) have completed or implemented adaptation plans to protect facilities from the effects of climate change. To support this work, SCAG convenes stakeholders via a Climate Adaptation and Resilience Working Group. SCAG anticipates sharing climate adaptation-related tools and toolkits with stakeholders in the summer 2020. This current work will inform SCAG's future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, including an emphasis on adaptation and resilience, and the connection to public health and vulnerable populations, in the next plan.</p>
0001383.08.2	<p>Similarly, we recommended the inclusion of more specific data related to the disproportionate burden faced by low-income and communities of color due to current and future climate impacts (e.g. poor air quality, asthma rates, homes in inundation areas, etc.).</p>	<p>Comment noted. The Environmental Justice Technical Report is focused on analyzing plan impacts on minority and low-income communities throughout the region. The Technical Report includes an analysis of climate change impacts (e.g., sea level rise, wildfire risk areas, flood hazard zones, etc.) on these communities. The Technical Report notes that existing conditions show that minority and low-income populations are at a greater risk for experiencing negative impacts from climate change, like extreme heat, flooding, and other extreme events. These populations have fewer resources to cope with climate consequences. Lack of air conditioning and transportation options may exacerbate vulnerability in heat prone areas and access to cooling centers may be limited. In addition, minority and low income households may be disproportionately impacted by the disruption to their place of work and the local economy, since many may have limited financial resources. The Environmental Justice Toolbox section of the report provides potential strategies to reduce harms at the local level. Additionally, SCAG is currently finalizing its Regional Climate Adaptation Framework. This current work will inform SCAG's future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, including an emphasis on impacts to minority and low-income communities, in the next plan.</p>

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<i>Submitted by</i>	Public Health Alliance of Southern California	Submittal 0001383 Related Documents Link
0001383.08.3	<p>We applaud the thoughtful consideration of the plan implementation strategies and actions. We propose the inclusion of HPI as a strategic tool to further Strategy 2, Action D. In order to advance the goals of Strategy 2 for Local Jurisdictions and Partners, and Strategies throughout the Plan and Technical Reports, we recommend including explicit language about providing financial support to community-based partners and community members for their engagement in stakeholder meetings and coalitions throughout the continued refinement, implementation, and evaluation of the Plan.</p>	<p>Comment noted. SCAG values the utility of the California Healthy Places Index (HPI) tool for local, regional, and state government agencies, as well as community groups, and looks forward to continuing to identify ways to encourage more access to public data and related analyses. SCAG also values the engagement of its community-based partners and community members and will work to identify ways to continue to encourage their participation in regional plans, projects, and programs.</p>
0001383.09	<p>Greater Investments in Active Transportation:Active transportation investments, which are almost double compared to the previous Plan, still represent a small percentage (approximately 3.5%) of the overall Plan. While this reflects available funding for active transportation and is aligned with current mode shares, it is still an insufficient amount to increase the number of people walking and bicycling in the region, and more investments will be needed to meet the region’s SB 375 targets. We urge SCAG and its members to identify additional ways to invest in active transportation to support a healthier region, and to identify strategies to increase support in areas where these projects are facing opposition.</p>	<p>SCAG recognizes the need for increased funding for active transportation projects and will continue to support member jurisdiction applications for grant funding. Additionally, SCAG supports efforts to increase funding for active transportation projects at the local, state, and federal levels. Current available funding sources can be found in Appendix 6 of the Active Transportation Technical Report.</p>
0001383.10	<p>Data CollectionWe applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the “Daily amount of walking and biking related to work and non-work trips” and the “Collision rates by severity and mode.” We encourage cities and counties to collaborate with SCAG, Public Safety Departments, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts and benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes. In order to provide more information and context to local jurisdictions, we recommend including additional data and evaluation strategies related to the impacts of active transportation, including; an analysis and model of the safety impacts of active transportation; a return on investments analysis for investments in active transportation infrastructure and technology; and a recommendation to systematically install automated counters along bike paths and other active transportation thoroughfares.We also urge SCAG to establish more meaningful targets for many of the goals in the Plan other than “improvement over baseline.” While the Plan touts the benefits of making the proposed transportation investments, this Plan covers a long range of time where more ambitious targets could be established and strived for by SCAG and its member cities and counties. The target-setting process for the Federal Highway Administration’s Safety Performance Measures was a good standard to follow and should be considered for other goals in the Plan, so we have greater accountability for meeting these goals.</p>	<p>We concur with your assessment of the importance of regional collaboration on the development and compilation of public health data resources as a means for identifying emerging trends at the local and regional levels, particularly in disadvantaged communities where access to quality health care may be limited. SCAG will continue to seek out reliable new sources of public health data to evaluate for possible inclusion in future regional analyses and performance reporting. SCAG will also continue to coordinate with our regional partners on the investment and implementation of applicable new technologies to facilitate our local and regional public health and safety data collection efforts.</p>

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<i>Submitted by</i>	Rail Propulsion Systems LLC	Submittal 0001471 Related Documents Link
0001471.01	<p>Rail Propulsion Systems (RPS) is a Fullerton-based company providing Practical Modernization retrofit systems for passenger and switcher locomotives. These include exhaust after-treatment systems to lower the emissions of legacy diesel locomotives and also diesel to battery conversions to provide electrification options with minimal infrastructure investment. The after-treatment retrofit system reduces the emissions of both engines in a conventional passenger locomotive and is call the Blended After-Treatment System (BATS). RPS has a very broad patent on this system and it is already EPA certified. As a transition into the electrified passenger rail market, RPS will be offering diesel to battery conversion systems for smaller low speed switcher locomotives. As a company based in the SCAG region, we welcome the opportunity to provide input to the regional planning process. RPS offers the below comments on the Connect SoCal 2020 Regional Transportation Plan/Sustainable Communities Strategy- Passenger Rail and Goods Movement technical reports.</p>	Thank you for your comment.
0001471.02	<p>Comments on Passenger Rail technical report: There is a great need for near-zero and zero-emissions locomotives in Southern California. Even though Tier 4 diesel locomotives are significantly cleaner than older ones, they are still enormously dirty compared to an electric locomotive. They still consume fossil fuels and generate significant emissions. Recent studies have shown the health impacts of diesel locomotives to passengers and crew to be significant, and the health impacts of ultrafine particulate emissions (even from a ‘clean’ diesel) are only beginning to be understood.</p>	<p>Connect SoCal supports near-zero and zero-emission locomotives and transit vehicles in general as the technology becomes available. As funding is acquired and Metrolink Southern California Optimized Rail Expansion (SCORE) projects are delivered over time, Metrolink will be able to plan, acquire and put in to service the necessary number of expansion locomotives required for this phased plan. SCORE also includes a proposed systemwide electrification study.</p>
0001471.03	<p>The paragraph ‘Tier 4 Locomotives and Electrification’ (pg. 12) implies that the 40 diesel F125 locomotives purchased recently will be the only locomotives that Metrolink will operate for the next 30 years. However the quantity of 40 locomotives is not nearly enough for the level of service increases that Metrolink is proposing over the next 10 years. Metrolink is expecting rapid growth in its train frequency, under its SCORE funding plan the Orange county line currently at less than 1 train per hour (13 trains per day), will have minimum frequencies of 2 trains per hour in 2025 and 4 trains per hour by the 2028 Olympics, for example. The existing fleet of several dozen diesel locomotives is not enough to support this growth. Even if Metrolink had the amount of diesel locomotives needed, it still doesn’t justify delaying electrification. Continuing to run a 100% diesel fleet for the next two decades will not be environmentally or socially acceptable. At the very least a hybrid solution of a battery locomotive supplementing a diesel will help meet air quality and carbon goals.</p>	<p>As funding is acquired and Metrolink Southern California Optimized Rail Expansion (SCORE) projects are delivered over time, Metrolink will be able to plan, acquire and put in to service the necessary number of expansion locomotives required for this phased plan. SCORE also includes a proposed systemwide electrification study.</p>

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<i>Submitted by</i>	Rail Propulsion Systems LLC	Submittal 0001471 Related Documents Link
0001471.04	<p>Comments on Goods Movement technical report: The level of investment that the railroads and government agencies are making into the region’s freight rail network is impressive (Rail Strategies, pgs. 40- 46). With \$14.5 billion targeted for the proposed rail projects, a significant portion of this will likely come from public sources. To accelerate the commercial availability of cleaner locomotive technologies, public funding will be required to put pilot fleets of advanced locomotives into service to demonstrate the equipment’s viability. The mainline, port area rail, railyard and grade separation projects are worthy of public support, given the economic and public benefits to the region. In order to maximize this support, government agencies should leverage their contributions to railroad companies to encourage the best available cleaner locomotive technologies, with an eventual goal of zero-emissions.</p>	<p>SCAG does not make any funding contributions to railroad companies, especially as implementation is not within the purview of the agency. SCAG is supportive and willing to facilitate opportunities, as appropriate and feasible, to work collaboratively with public and private sector concerns to advance funding and implementation of strategies to enhance the movement of goods throughout the region while mitigating its negative effects.</p>
0001471.05	<p>Freight Rail Emissions Reduction Strategies- Less than 5% of non-electrified Rail activity within the SCAG region is conducted with Tier 4 or better locomotives (p. 62), and CARB has presented data that the locomotive inventory is going backwards with older equipment being brought back into service as it is more capable and maintainable than newer low emissions locomotives. Further, Metrolink is reporting that their new Tier 4 fleet is using more fuel than anticipated, which means greater carbon emissions than anticipated. While Tier 4 diesels significantly reduce emissions compared to legacy diesel locomotives, Tier 4 locomotives still emit 6.5 times the NOx and 30 times the PM emissions of 2010 and newer on-road trucks and are not a viable long-term solution to improve air quality.</p>	<p>Tier 4 locomotives are being phased in slowly as railroads do not find it economical to retire older equipment before the end of its useful life. While not zero emission, relative to Tier 2 engines, Tier 4 engines produce between 75-85 percent less NOx and PM emissions.</p>
0001471.06	<p>After-treatment systems to make diesel locomotive emissions cleaner (p. 126, Near-Term Emissions Reduction Strategies), are a “bridge” to zero emissions vehicles, but the systems installed on some Tier 4 platforms are potentially a bridge to nowhere. Many of the new high speed four cycle diesel engines cannot be upgraded easily for alternative fuels that would allow them to achieve Tier 5 or greater emissions reductions. Interestingly, older 2 cycle medium speed engines can be converted to alternative fuels such as natural gas. It is really disappointing that so much effort and money has been wasted developing a new Tier 4 diesel engine when, with some ingenuity the same results can be obtained with existing 2-stroke engines. When combined with an after treatment system, a legacy medium speed locomotive engine converted to natural gas can attain Tier 5 or better emissions reduction. This would allow passenger rail agencies to greatly reduce their emissions and continue to operate existing reliable equipment until equivalently capable and reliable near zero or zero emissions solutions are market ready. For medium range applications such as short freight lines and commuter rail, this issue has significant importance.</p>	<p>Comment noted. The opportunity to use after-treatment technologies is mentioned briefly in Appendix 1 of the Goods Movement Technical Report, in the section entitled Near-Term Rail Emission Reduction Strategies.</p>
0001471.07	<p>Fully zero-emission electric locomotives need to be introduced in the SCAG region where the technology is appropriate today. Applications such as railyard switchyard locomotives are an ideal opportunity.</p>	<p>Comment noted.</p>
0001471.08	<p>Technologies in Development (pgs. 127-128): Natural gas either compressed (CNG) or liquefied (LNG), is an excellent low emissions transition fuel to develop a hydrogen infrastructure for heavy duty applications in the future. This come with the assumption the implementation and operation of the natural gas infrastructure is managed adequately as unburned methane is a potent greenhouse gas and leaks from venting and filling errors are of serious concern both for the environment.</p>	<p>Comment noted.</p>

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<i>Submitted by</i>	Rail Propulsion Systems LLC	Submittal 0001471 Related Documents Link
0001471.09	Long-Term Emissions Strategies for Rail- The so-called ‘long term’ electrification strategies can actually start being deployed in the short and medium term.	SCAG is supportive of deployment of new technologies when they are determined through demonstration to be operationally and commercially viable.
0001471.10	This section mentions how in late 2017, the California Air Resources Board awarded funding to a demonstration project at the Port of Los Angeles, in partnership with Pacific Harbor Lines, of a battery electric/natural gas hybrid locomotive developed by VeRail Technologies. However, this project was not completed as VeRail has since ceased operations. This is failed project, and reference to it should be removed.	Corrections about the referenced locomotive demonstration project have been addressed in the Goods Movement Technical Report.
0001471.11	The paragraph ‘Options for Zero-Emissions Operation’ (pg. 128) omits the technology of all battery-electric locomotives. While a hybrid electric locomotive is mentioned briefly, in practice an all-battery, zero-emissions locomotive can be paired with an existing diesel locomotive to operate as a hybrid pair. This is a viable option for zero-emissions locomotive track miles of operation in the SCAG region. Battery-electric locomotives could also be easily used as switchers in railyards. Such operation within a railyard avoids the operational (locomotive change-out) and range limitations which would make battery operation a challenge for line-haul freight and regional passenger trains. Zero-emissions switcher locomotives would also directly replace existing diesel switchers, which are typically the oldest and dirtiest locomotives in a railroad fleet. These dirty locomotives in urban railyard service have a disproportionate impact on neighboring communities, so replacing them with electric switchers would have significant public health benefits.	SCAG concurs that inclusion of an all battery-electric locomotive is applicable to the referenced paragraph, and the Goods Movement Technical Report has been updated accordingly.
0001471.12	The ‘Goods Movement Technologies’ sections of the Connect SoCal Emerging Technologies chapter should discuss electric rail, along with new intermodal rail car technologies which will encourage mode shift from truck to rail.	Electrification technologies require further evaluation to more precisely address questions about cost, funding and how to best implement such systems with minimal operational impacts. Because of the costs and potential operational challenges associated with mainline electrification, such a strategy should be considered a longer-term initiative, requiring further studies as well as proof of concept and prototype testing of zero emission locomotive technologies that have the potential to minimize cost and operational impacts. Electrification of the rail system in the SCAG region would require the leadership of UP Railroad and BNSF Railway. Electric rail technologies are briefly discussed in Appendix 1 of the Goods Movement Technical Report, entitled Near and Long Term Zero and Near Zero Emissions Technology Opportunities for Trucks and Rail. Due to market forces and the demand for flexibility, such strategies still might not lead to a mode shift.
0001471.13	Battery Electric Locomotives Southern California: Battery-electric locomotives, can play an important role in short-haul freight rail service, and commuter passenger service. The faster acceleration and zero-emissions track miles enabled by electric locomotives will greatly enhance the environmental and de-congestion benefits of both services. As battery switcher locomotive technology is further developed in the next several years, operational enhancements will be provided by advanced charging stations.	The Southern California Regional Rail Authority, Amtrak, Union Pacific and Burlington Northern Santa Fe railroads are the lead agencies in planning, funding and placing in to revenue service locomotives for their operations. As such, as new technology becomes available and commercially viable, it is expected that these agencies will consider retiring diesel locomotives and replacing them with alternative-fueled and electric locomotives.
0001471.14	RPS’s proposed plan to advance of Southern California freight rail battery electrification will begin with a pilot project of battery-electric switchers in freight rail yards. This will be followed by a pilot project of ‘Range Extended’ battery-electric switchers at the San Pedro Bay ports, up the Alameda Corridor, and in railyards across the region.	Thank you for this information. This comment has been noted.

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<p><i>Submitted by</i> Rail Propulsion Systems LLC</p> <p>0001471.15</p>	<p>There needs to be more federal, state and locally-funded programs that could support zero-emission locomotive research and development (R&D) projects and technology demonstration projects. There are plenty of incentives and R&D programs, at both the state and federal levels, supporting electric cars and trucks. By contrast, public R&D funding opportunities for electric rail technologies are few and far between. Southern California should be a leader in zero emissions, electric rail technology, and SCAG could be a major advocate for this technology. Thank you for your consideration.</p>	<p>Submittal 0001471</p> <p>Related Documents Link</p> <p>SCAG efforts to promote advancement of zero emission rail technology are discussed in the Goods Movement Technical Report.</p>
<p><i>Submitted by</i> RailPAC</p> <p>0001472.01</p>	<p>Dear Connect SoCal Team: The Rail Passengers Association of California & Nevada (RailPAC) welcomes the opportunity to provide input to the Connect SoCal 2020 Regional Transportation Plan/Sustainable Communities Strategy. The Southern California Association of Governments (SCAG) is in a unique position to encourage the state, county and local governments to work together to improve passenger rail service in Southern California.</p> <p>RailPAC offers the below comments on the Connect SoCal Passenger Rail report. The Passenger Rail report's Vision and Purpose (p. 2) sets a very positive tone for passenger rail in the SCAG region over the next few decades, with goals to grow ridership and provide more frequent, and new, rail services. RailPAC has always focused on intercity passenger service and regional rail. While it is important to move large numbers of people short distances by transit, it is equally beneficial to the community to move smaller numbers of passengers over relatively longer distances. An intercity train journey of 70 miles or more is the equivalent to 13 transit journeys in terms of vehicle miles avoided. Investment in Intercity and Regional Rail in the SCAG region has been totally inadequate for the past three decades. We still are trying to operate a modern service with many miles of single-track railroad. The approach to Los Angeles Union Station, the hub of the network, is circuitous and serpentine, unnecessarily adding 5 to 10 minutes to every journey. A bypass track is needed to avoid the near sea level alignment through San Clemente, a serious capacity constraint on the key route between California's two largest cities.</p>	<p>Submittal 0001472</p> <p>Related Documents Link</p> <p>Thank you for your comment. Connect SoCal supports the funding and construction of new rail infrastructure in the SCAG region, including the Southern California Optimized Rail Expansion (SCORE) program, in order to increase passenger rail service levels and speeds to attract new riders and better utilize the commuter rail system in our region. Full build-out of the Metrolink SCORE program is in Connect SoCal's financially-constrained plan.</p>
<p>0001472.02</p>	<p>Detailed comments: Metrolink SCORE (pgs. 34-41)- The Metrolink SCORE program is a welcome and long overdue step forward. It can transform Metrolink from a commuter-oriented system (focused on rush hour service to Downtown LA and Irvine) to a truly regional rail system with frequent service in all directions, 7 days a week, from early in the morning to late at night. These SCORE projects need to expedited, and funding needs to be clearly identified: - Laguna Niguel/Mission Viejo Siding (OCTA) - Raymer to Bernson Double Track (LA Metro) - Brighton to Roxford Double Track (LA Metro) - Doran Street Grade Separation (LA Metro) - Lone Hill to White Double Track (LA Metro) - Placentia Metrolink Station (OCTA)</p>	<p>Connect SoCal supports the funding and construction of new rail infrastructure in the SCAG region, including the Southern California Optimized Rail Expansion (SCORE) program, in order to increase passenger rail service levels and speeds. Full build-out of the Metrolink SCORE program is in Connect SoCal's financially-constrained plan. These projects are discussed in more detailed on pages 24 through 26 of the Passenger Rail Technical Report.</p>

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<i>Submitted by</i>	RailPAC	Submittal 0001472 Related Documents Link
0001472.03	LOSSAN Corridor Rail Service (pg. 28), San Diego to Orange County market: SCORE needs to be integrated with LOSSAN and Surfliner. Due to the huge amount of traffic exchanged between SCAG and SANDAG every day, there should be a pooled Coaster/Metrolink additional service San Diego to Fullerton (stopping at Fullerton avoids the frequency conflict on the BNSF with the 91 line slots). The pool trains would connect to the Metrolink 91 and Orange County line trains at Fullerton, on continue to LA Union Station. SCAG and the LOSSAN agency should actively encourage this pooling of Metrolink and Coaster rolling stock and services, and start a working group on it with NCTD or SANDAG. Such a working group would figure out technical issues such as equipment compatibility between Coaster and Metrolink, voltage of hotel power, position of wheelchair ramps, position of locomotive on the train, etc.	The Southern California Regional Rail Authority (SCRRA) is working with the LOSSAN Agency to integrate the two services as rail infrastructure improvements are delivered as part of the Southern California Optimized Rail Expansion (SCORE) program. These two agencies' governing boards are comprised of representatives of the county transportation commissions where they provide service, as well as SCAG (in a non-voting role). NCTD and SANDAG are also member agencies of LOSSAN and have voting representation on the LOSSAN Board of directors.
0001472.04	New passenger rail services (pgs. 27-28)- Los Angeles to Coachella Valley- This service is long overdue. There is an urgent need to start discussions with UP on the infrastructure upgrades needed. For the distance involved and the kind of traffic an intercity service similar to Surfliner is appropriate, rather than Metrolink regional rail. - Victorville to Las Vegas/High Desert Corridor- SCAG should work with Los Angeles County, San Bernardino County, and Virgin Trains USA to connect the Victorville-Las Vegas train to the Palmdale station via the proposed High Desert Corridor. - Coast Daylight/ Coast Rail Coordinating Council (CRCC) RailPAC supports restoration of the Coast Daylight if a competitive transit time can be achieved. - Southwest High-Speed Rail Network (pgs. 28-30) The 2014 study recommended a CA-AZ-NV volunteer passenger rail policy and planning group, and a 'blue ribbon commission' to study a Phoenix-Southern California Corridor. RailPAC would like to participate in this, if such a commission is created to start implementing an LA-Phoenix service (and not just another study).	Connect SoCal supports establishing passenger rail service in un-served and under-served markets. SCAG is an active partner with the Riverside County Transportation Commission, Los Angeles County Metropolitan Transportation Authority, San Bernardino County Transportation Authority, the LOSSAN Rail Agency and Virgin Trains USA in advancing these markets towards the implementation of passenger rail service.
0001472.05	Amtrak- Pg. 8. Exhibit 1 Amtrak services - Why not show Amtrak stations on the map? Pg. 9- Needs updating after passage of SB742 re Thruway busses. The report does not explain the extensive State role in LOSSAN and refers to the service as "Amtrak's Pacific Surfliner". Pg. 22- Pacific Surfliner On-Time-Performance (OTP): The Surfliner OTP statistics need tighter metrics than 10 minutes or 15 minutes off of schedule. The Metrolink OTP standard (pgs. 22-23) is 6 minutes off schedule.	Pages 9 and 23 of the Passenger Rail Technical Report will be edited per the comment. The State's role in LOSSAN is addressed in the Regulatory Framework section.
0001472.06	Not surprisingly, the report makes no mention of the pitifully small market share of both intercity or commuter rail, nor does it mention the lack of connectivity between Metrolink routes at LA Union Station. 3 million a year is about 4100 round trips a day, 8200 single rides, in a population catchment of at least 16 million. That's not even a rounding error 0.06%). 46 mph and 69% OTP factor in.	Connect SoCal advocates for increasing utilization of the passenger rail services in the SCAG region, including Metrolink, and invests significantly in rail capital improvements, including the Southern California Optimized Rail Expansion (SCORE) program, to increase passenger rail speeds and service levels.
0001472.07	Metrolink's story on pgs. 22 and 23 is similar, a tiny percentage of journeys in the region. Also, the definition of commuter rail (pg. 11) is completely out of date with modern travel patterns and needs to be updated to a definition of "regional rail".	Connect SoCal advocates for increasing utilization of the passenger rail services in the SCAG region, including Metrolink, and invests significantly in rail capital improvements, including the Southern California Optimized Rail Expansion (SCORE) program, to increase passenger rail speeds and service levels.

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<i>Submitted by</i>	RailPAC	Submittal 0001472 Related Documents Link
0001472.08	Hollywood Burbank North Station (pg.24) - the airport no longer provides a shuttle to meet every train, on demand only. The station will not be used by HSR and will most likely be demolished hen the second track is added.	Page 24 of the Passenger Rail Technical Report will be edited per the comment.
0001472.09	California High Speed Rail (pgs. 12-15)- SCAG should press for completion of the Southern California tunnels as soon as possible. First priority is Antelope Valley to San Fernando Valley which will initiate high speed regional service. Los Angeles to San Diego - this Phase Two section needs to be accelerated, especially in light of the ongoing erosion of the Del Mar bluffs. In addition, the existing LOSSAN route needs a bypass track to take the line away from the near sea level section at San Clemente. This single track is both vulnerable to sea level rise and is a serious capacity bottle neck.	Comment noted. Connect SoCal includes Phase 1 of the California High-Speed Train in the financially-constrained plan with a completion date of 2033 as identified in the California High-Speed Rail Authority's 2018 Rail Business Plan. Phase 2 of the California High-Speed Train is included in the financially unconstrained Strategic Plan for informational purposes.The Rail and Sustainability section on page 3 of the Passenger Rail Technical Report discusses the erosion threat to the LOSSAN Corridor that may be caused by climate change.
0001472.10	Locomotives- The paragraph 'Tier 4 Locomotives and Electrification' (pg. 12) implies that the 40 diesel F125 locomotives purchased recently will be the only locomotives that Metrolink will operate for the next 30 years. However the quantity of 40 locomotives is not nearly enough for the level of service increases that Metrolink is proposing over the next 10 years. Metrolink is expecting rapid growth in its train frequency, under its SCORE funding plan the Orange county line currently at less than 1 train per hour (13 trains per day), will have minimum frequencies of 2 trains per hour in 2025 and 4 trains per hour by the 2028 Olympics, for example. The existing fleet of several dozen diesel locomotives is not enough to support this growth. Even if Metrolink had the amount of diesel locomotives needed, it still doesn't justify delaying electrification. Continuing to run a 100% diesel fleet for the next two decades will not be environmentally or socially acceptable. At the very least a hybrid solution of a battery locomotive supplementing a diesel will help meet air quality and carbon goals.	The Southern California Regional Rail Authority (SCRRA) is currently developing an update to its 2015 Strategic Plan that reflects full build-out of Southern California Optimized Rail Expansion (SCORE) projects, which includes much greater service levels. This plan will estimate operations and maintenance (O&M) costs, including fleet equipment and locomotive requirements and costs.
0001472.11	There need to be more federal, state and locally-funded programs that could support zero-emission locomotive research and development (R&D) projects and technology demonstration projects. There are plenty of incentives and R&D programs, at both the state and federal levels, supporting electric cars and trucks. By contrast, public R&D funding opportunities for electric rail technologies are few and far between. Southern California should be a leader in zero-emissions, electric rail technology, and SCAG could be a major advocate for this technology.	Comment noted. SCAG efforts to promote advancement of zero emission rail technology are discussed in the Goods Movement Technical Report.
0001472.12	Freight Rail Operations (pgs. 16-17) - It is commendable that SCAG recognizes that freight rail infrastructure investments have great public benefit. RailPAC fully supports expansion of freight rail capacity and new grade separations on shared corridors, as this will reduce potential for congestion conflicts and delays to passenger trains. More capacity also allows more passenger trains to run.	Comment noted.

ID	Comment	Response
<p><i>Submitted by</i> RailPAC Submittal 0001472 Related Documents Link</p>		
0001472.13	<p>One issue that needs attention is the safety and reliability impacts of Precision Scheduled Railroading (PSR) practices of several of the Class I railroads, notably Union Pacific (UP) in Southern California. UP in particular is adopting so-called PSR to cut costs, running longer and heavier trains, two miles or more in length, which are slower to accelerate. There are several reasons that the longer trains are not in the public interest. First of all, the waiting times for vehicles and pedestrians at the various UP railroad crossings on roads and streets in the SCAG region are getting longer. This inconveniences the public (hundreds of people at a time), creates more pollution from idling vehicles, and harms the flow of local commerce. It also makes it more difficult to share the tracks with passenger trains, which end up running late because of long slow trains taking up so much space on the rails. PSR's focus on short term profit is a danger to the future of rail transportation, and is leading to corners being cut on safety. Over 100 long freight trains pass through the SCAG region each day.</p>	Comment noted.
<p>0001472.14 Submittal 0001478 Related Documents Link</p>		
0001472.14	<p>The use of the term "freight railroads" is inappropriate and misleading. "Common Carrier Class I Railroads" should be used.</p>	Comment noted.
<p><i>Submitted by</i> Responsible Land Use Submittal 0001478 Related Documents Link</p>		
0001478.01	<p>Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Responsible Land Use is now a part of this growing coalition in 2020. Responsible Land Use works in Los Angeles, San Bernardino, and Orange counties. Our mission is to preserve our remaining natural open spaces by careful, considered planning. We offer the following comments on the Natural and Farmland policy, goals, and next steps.</p>	Thank you for your comments. Comments noted.
0001478.02	<p>Our organization supports the idea that as new growth occurs it should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what conservation mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved by focusing development elsewhere, doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus our work on protecting important habitat lands. A lot of time, energy, money, strategy, and political will are combined to create a successful conservation transaction that lead to permanently conserved lands. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.</p>	Suggested mechanisms for conservation are listed in Chapter 3 of Final Connect SoCal as well as in the Natural & Farmlands Conservation Technical Report. Additionally, Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and support long-term management and stewardship of mitigated properties.

ID	Comment	Response
<i>Submitted by</i>	Responsible Land Use	Submittal 0001478 Related Documents Link
0001478.03	We therefore appreciate the land use priority on page 42 which encourages “growth in walkable/mixed-use communities with ready access to transit infrastructure and employment opportunities.” This is a laudable goal which we whole heartedly support. However, given the level of traffic congestion in our region, we believe the SCAG plan should also support every possible way of getting people out of their cars. One way to do this is to take advantage of other types of mixed-use opportunities.	Thank you for your comments. Comments noted.
0001478.04	Diamond Bar, where we live, is an interesting case in point. Diamond Bar is essentially built out. Our steep hillside terrain barely accommodates the traffic needs of the nearly sixty thousand people who live here. Our traffic congestion challenges are complicated even more with horrendous cut through traffic caused by the bottlenecked 57/60 interchange, the 5th worst congested intersection in the entire country, which runs along portions of our northern border. We also have a Metrolink transit station along our northern border with City of Industry. An area which SCAG has marked as a “Priority Growth Area” in Exhibit 3.4, and a “Transit Priority Area in Exhibit 3.7. In its recently completed general plan update, Diamond Bar wisely designated this area as a high-density, mixed-use area.	Comments noted.
0001478.05	However, in the coming years, Diamond Bar’s updated general plan anticipates needing approximately 3,000 additional housing units, a number which will require more than our newly designated transit area will be able to accommodate. If Diamond Bar is going to add additional housing with minimal impact on our already intolerable congestion levels, Responsible Land Use believes that the next best plan for adding additional housing units would be to upgrade our car-centric retail centers into pedestrian-friendly, mixed-use areas, and place our additional housing units there. For Diamond Bar, and many other nearly built out cities in southern California, this will be one of the only ways of both adding housing units that minimally impact the congestion on our already overcrowded streets, and also preserve what’s left of our precious open spaces.	Comment noted. These strategies are aligned with and reflected in the Focus Growth Near Destinations and Mobility Options section of the Sustainable Communities Strategies.
0001478.06	While we believe that properly designed mixed-use areas near transit stops can be beneficial additions to our communities, care must be taken to avoid shortcuts in planning for these areas. The newly resurrected SB50, for example, essentially supports placing high-density housing all by itself near transit stops. Allowing this will create more problems than it solves.	Comment noted. While Connect SoCal is intended to provide a regional policy foundation that local governments may build upon if they so choose, local jurisdictions maintain local land use authority.
0001478.07	U.S. Department of transportation research shows that work commutes constitute a minority of vehicle trips. The majority of vehicle trips are for shopping and other errands. Those who can afford the prices for high density developments near transit stops, are also typically able to afford cars. The net result of this is if high-housing, all by itself, is allowed near transit stops, it typically ends up creating more car-centric households, which make our traffic congestion challenges in those areas even worse. We therefore urge SCAG to only advocate for carefully planned mix-use development. Additionally, as we move into the future, we will need many different options for protecting our open remaining natural open spaces, creating additional housing units while at the same time minimizing impacts on our traffic congestion. All possible avenues for achieving these imperatives, such as the one suggested above, should be identified and explored.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Responsible Land Use Submittal 0001478 Related Documents Link		
0001478.08	Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix.	Thank you for your comment. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of conservation strategies, and we will send notifications about upcoming opportunities to the provided email address.
<i>Submitted by</i> Retro Bicycle corp. Submittal 0001391 Related Documents		
0001391.01	This entire plan is anti democratic and profoundly unjust. Elites have held few extremely poorly noticed hideously poorly attended hearings where there has been almost zero press coverage or public outreach.. Proponents have devised a sham process with which to steal ever more power over average citizens lives. Every so called improvement and tax proponents have imposed upon the People of Southern California has made their lives worse not better, increased not relieved traffic congestion nd increased pollution by increasing congestion. Proponents should be unemployed their un elected un accountable Soviet style agency dismantled and this silliness about shoving a 19th Century rail system down everyones throat when people no longer work as they did in the 19th Century, should be abandoned along with these poorly designed dangerous bicycle lanes and phoney "Safe Steets initiatives that are increasing traffic fatalities.	Comment noted.
<i>Submitted by</i> Right of Say Submittal 0001315 Related Documents		
0001315.01	1) Are you waiting to study the Green Line Extension SOUTH of Marine until after the decision has been made as to the configuration of the Green Line NORTH of Marine? When do you think that decision will be made (on Green Line North operation)? Or is there a specific date when the EIR for the Green Line Extension to the South will begin?2) It really does not make sense to push to study the Green Line South if Metro has not decided how the Green Line North is going to operate. In fact, if Redondo does not get a "one seat ride" to the airport because of the North configuration, I have heard at least one council member say that they do not care what Green Line configuration is used South of Marine. Who from Lawndale/Redondo/Torrance is going to take Metro to the airport if they have to change trains?3) The South Bay citizens are almost completely united for Alternative 3 for the Green Line Extension (down Hawthorne, NOT down the ROW). As we are fond of saying here in the South Bay: "Alternative 3 is right for me!"	The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects including the Green Line Extension to Torrance. More information can be found on the Metro website at https://www.metro.net/projects/green-line-extension/ . Inquiries and comments regarding Metro's current environmental review process should be directed to the Metro project manager.
<i>Submitted by</i> Riverside County Transportation Commission Submittal 0001384 Related Documents		
0001384.01	For CETAP West (East-West Corridor; RTP ID 3C01MA01), please change the completion year to 2040 for the 2020 RTP/SCS.	Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by Riverside County Transportation Commission through the standard RTP long-range project list modification update processes. This modification could not be incorporated due to the timeline for completing the regional modeling process. However, the completion year change can be accomplished in an FTIP amendment, since it falls within the same network as year 2045. Please submit the request during the next Plan update.

ID	Comment	Response
<i>Submitted by</i>	Riverside County Transportation Commission	Submittal 0001473 Related Documents Link
0001473.01	Thank you for the opportunity to comment on this Southern California Association of Governments' (SCAG) draft 2020 RTP/SCS. This monumental effort is appreciated and reflects various issues and challenges associated with a highly populated and diverse region that relies on an integrated transportation system encompassing all modes for the movement of people and goods. We commend SCAG staff for establishing the various working groups in addition to working with cities, counties, transit operators, county transportation commissions, and community groups to develop a plan that addresses the various aspects of transportation and its impact on the environment, quality of life, public health, and environmental justice. The effort SCAG undertook in developing the regional demographic forecast to reflect general plans and local input allows the jurisdictions and agencies to uphold established goals and policies at the local level and maintain consistency with regional goals and policies. We are pleased with the focus on jobs/housing balance to reduce commute times and distance within the SCAG region, the support for legislation that reduces barriers to new construction, and the unwavering commitment towards safety and mobility for all users of the region's transportation network. Enclosed is a list of comments that include clarifications, corrections, and minor edits.	Comments noted.
0001473.02	Table 3.1- Revise Coachella Valley BRT to Coachella Valley Quick Bus.	Table 3.1 will be edited per the comment.
0001473.03	Exhibit 3.1- Remove the Coachella Valley BRT line from the map.	Exhibit 3.1 will be edited per the comment.
0001473.04	Pg. 65 - Revise "San Jacinto" to "San Jacinto/Hemet" for Riverside County Metrolink extension.	Chapter 3 will be edited per the comment.
0001473.05	Table 3.2- Remove "Also add one southbound auxiliary lane from Cajalco Rd to Weirick Rd."	Comment noted. Suggested changes will be incorporated into the Final Connect SoCal.
0001473.06	Exhibit 3.3- Incorporate RCTC's 1-15 Southern Extension as "planned dual-lane segment" in the map.	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001473.07	Exhibit 1 and 5 -Incorporate RCTC's 1-15 Southern Extension as "planned dual-lane segment" in the map.	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001473.08	Table 5- Remove "Also add one southbound auxiliary lane from Cajalco Rd to Weirick Rd."	Suggested changes will be incorporated into the Final Connect SoCal.
0001473.09	Pg. 54- Revise "Los Angeles" to "Riverside" for 1-215 truck bottleneck.	The referenced revision is reflected in the Final Connect SoCal.
0001473.10	General comment- Revise Coachella Valley BRT to Coachella Valley Quick Bus (ex: on Table 10).	"Coachella Valley BRT" will be revised to "Coachella Valley Quick Bus" in Table 10. Related Exhibits will also be updated.
0001473.11	Table 9- Add "Short Range Transit Plans" in the Short Range or Strategic Plan column for RCTC.	Table 9 of the Transit Technical Report will be edited per the comment.
0001473.12	Table 9- Revise "2019 Draft/In Process Long Range Transportation Plan" to "2019 Long Range Transportation Study" for RCTC under the Long Range Plan column. RCTC's Long Range Transportation Study was completed in December 2019.	Table 9 of the Transit Technical Report will be edited per the comment.
0001473.13	Exhibit 11- Remove the Coachella Valley BRT line from the map.	Exhibit 11 of the Transit Technical Report will be edited per the comment.

ID	Comment	Response
Submitted by Riverside County Transportation Commission		
		Submittal 0001473 Related Documents Link
0001473.14	Pg. 7- Confirm statements regarding thruway trips in the Pacific Surfliner paragraphs. Due to recent legislation, thruway trips no longer need to be connected to a train trip.	Page 7 of the Passenger Rail Technical Report will be edited per the comment.
0001473.15	Exhibit 1- Revise station locations for La Sierra and Downtown Riverside. The station locations in Riverside appear to be not located in the right spot. The La Sierra Station dot is closer to Adams and the Downtown station is past downtown Riverside. There also appears to be an extra station on the PVL line near Highgrove and mid-route near 215 Logo. The map should mirror Exhibit 2.	Exhibit 1 of the Passenger Rail Technical Report will be edited per the comment.
0001473.16	Pg. 10, second column, third paragraph down- Highlight success of the Perris Valley Line extension by adding: "The Perris Valley Line was added in the summer of 2016 with 24 miles of new track and 4 additional stations."	Page 10 of the Passenger Rail Technical Report will be edited per the comment.
0001473.17	Figure 4 and 5- Incorporate latest ridership data in the figures. Metrolink ridership data in the text is available through FY 18 yet Figure 4 and 5 only illustrate data through FY14.	Figures 4 and 5 of the Passenger Rail Technical Report will be edited per the comment.
0001473.18	Figure 6- Incorporate latest Farebox Recovery data in the figure. Farebox Recovery data in the text is available through FY 19 yet Figure 6 only illustrates data through FY 18.	Figure 6 of the Passenger Rail Technical Report will be edited per the comment.
0001473.19	Pg. 24- Revise the name of the station from {{Hunter Park" to {{Hunter Park/UCR" under the Metrolink Perris Valley Line.	Page 24 of the Passenger Rail Technical Report will be edited per the comment.
0001473.20	Pg. 26- Revise language on the Coachella Valley Rail Service paragraph to reflect the following; suggested revisions are italicized: {{RCTC is currently conducting a Program Environmental Impact Statement/Program Environmental Impact Report (PEIS/EIR) and Service Development Plan for the future Coachella Valley rail service between downtown Los Angeles and Indio via Fullerton. The planning exercise will conceptualize how the service would operate and what infrastructure improvements would be needed to accommodate the new intercity passenger rail service."	Page 26 of the Passenger Rail Technical Report will be edited per the comment.
Submitted by Riverside County Transportation Commission		
		Submittal 0001474 Related Documents Link
0001474.01	Pg. 27- Revise language on the Los Angeles to Coachella Valley paragraph. The Record of Decision is estimated to be in Spring 2021 instead of 2020. At this point in time, potential station stops for the rail service are still not defined and will be determined later. Remove references to potential station stops. Additionally, it is premature to state Union Pacific is opposed to implementing additional passenger service without large capital improvements. This is not a fair description of the project status since formal negotiations have not occurred. Remove references to Union Pacific. Lastly, remove findings from the 2010 RCTC cost estimate since the estimates will need to be reevaluated.	Page 27 of the Passenger Rail Technical Report will be edited per the comment.
0001474.02	Exhibit 9- Incorporate CV Rail in the map.	CV Rail will be incorporated in to Exhibit 9, Strategic Plan Projects.
Submitted by Riverside County Transportation Commission		
		Submittal 0001528 Related Documents Link
0001528.01	Please see attached.	Project modifications were incorporated as noted in the attached table except for 201101, which had the potential to impact modeling outputs. Please submit the project during the next RTP amendment.

ID	Comment	Response
<i>Submitted by</i> Ron Milam Consulting Submittal 0001369 Related Documents		
0001369.01	<p>I'm very supportive of smart growth strategies included in the plan. Let's plan and build higher-density, transit-oriented, affordable communities that prioritize people walking, bicycling and taking transit, over single occupancy vehicles and single family homes. Let's not build new highways or widen existing highways, instead lets create livable, complete streets that make all modes of transportation safer. Let's find ways to for SCAG to reward and fund cities doing supporting smart growth development in order to meet our regional and statewide climate goals. Let's connect our transportation goals with our climate goals, and find ways to develop more multi-story, multi-family, mixed-use, mixed-income housing. Thanks.</p>	Thank you for your comment. Comment noted.
<i>Submitted by</i> Safe Routes Partnership Submittal 0001492 Related Documents Link		
0001492.01	<p>Dear President Jahn, Thank you for providing the opportunity to provide comments on the Connect SoCal 2020 update. The undersigned organizations have worked together in collaboration and we submit a joint letter for your consideration. Many of us have participated in Connect SoCal's Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS) update process through various working groups, workshops, policy committees, regional council meetings and one-on-one meetings with staff. We have been engaged in the process because we understand regional planning helps create a blueprint for shaping the region's future. We recognize that updating the RTP/SCS requires a tremendous amount of effort on a regional scale. Southern California has a vast amount of diverse geographic areas with various opportunities and challenges. We need a regional plan that provides policy solutions to our affordable housing crisis, safe options to walk and bike in our communities, and jobs in the local communities. Furthermore, we need a regional plan that addresses current and future climate change impacts for the most vulnerable communities. Therefore, our joint letter is made of organizations who are invested in advocacy efforts throughout all of Southern California and are keeping the pulse of emerging planning needs from the desert to the sea. We present our comment letter in two main sections. First, we examine elements in the plan that we support. Second, we identify areas of improvement and provide policy recommendations under specific issue areas. Submitting a comment letter on behalf of 16 organizations. We are submitting comments on active transportation, environmental justice and other RTP/SCS areas. The letter represents organizations from the following SCAG areas: Inland Empire: 3 organizations, Orange County: 3 organizations, Los Angeles County: 5 organizations, Statewide/National: 5 organizations</p>	Thank you for your comment .
0001492.02	<p>Connect SoCal elements we support: 1. Funding Community Based Organizations (CBO) for RTP/SCS outreach: We support SCAG's efforts to contract with community based organizations to lead Connect SoCal outreach. We support the practice of paying CBO's for outreach work as trusted partners. We also hope that SCAG expands this model for other outreach needs, including working group member participation and technical assistance.</p>	Thank you for your comment. SCAG is committed to continuing the coordination with CBOs established during the development of Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001492 Related Documents Link
0001492.03	2. Inventory of Active Transportation Plans: Appendix 2 of 6 in the active transportation report includes an inventory of city level, county level and multi-jurisdictional plans. This list of plans is extremely useful in that it allows advocates and community members to track the progress of the plans. Another useful tab would be to include information such as an agency website, where stakeholders can find more information on the plan itself. We applaud the effort of coordinating with jurisdictions to identify all plans that are in progress or are being developed within the region.	Thank you for your comment. While SCAG does not currently maintain a database with the requested information, we recognize the value of such a tool and will develop as staff capacity allows.
0001492.04	3. Improvement of public health data & Health in All Policies approach: We are pleased to see the social determinants of health incorporated in the plan, especially in the public health report. This framework provides a critical perspective to develop policies that will positively impact health outcomes in our region.	Thank you for your comment. Comment noted.
0001492.05	4. Emphasis on non-infrastructure investments like Go Human and Safe Routes to School (SRTS) programs: The plan elevates non-infrastructure programmatic projects like Go Human and SRTS as public educational opportunities. Go Human and SRTS are model avenues in which the public can learn more about active transportation options in their community and be engaged in the process. We applaud the inclusion of these programs as good examples more jurisdiction should participate in. We encourage SCAG to expand their role in SRTS programs by initiating partnerships between Go Human and SRTS efforts in the region. More SRTS demonstration projects supported by Go Human's efforts are a key way that jurisdictions can grow their capacity around safety.	Thank you for your comment. SCAG recognizes the value of Safe Routes programs and other non-infrastructure investments and will continue to support these efforts and to expand the Go Human program.
0001492.06	5. The inclusion of the Environmental Justice (EJ) Toolbox and the EJ report performance indicators: The EJ working group provided comments on the EJ toolbox and we are pleased to see many of the comments included in the report. The EJ toolbox contains a strong list of policy options for jurisdictions to adopt. We also appreciate the inclusion of the EJ report performance indicators, as it makes it easier to see how EJ- related issue areas (such as active transportation hazards, climate resilience, accessibility to parks/open spaces) will impact particular elements of a general plan. Although not to be substituted for an EJ element, performance indicators help remind jurisdictions to incorporate EJ considerations throughout a general plan.	Thank you for your comment.
0001492.07	Connect SoCal elements that can be improved and strengthened in the 2020 update:Community Engagement & Technical Assistance1. Expand community participation by providing educational opportunities for the public outside of the RTP/SCS update period: Many of the undersigned organizations participated as Connect SoCal outreach partners. One of the lessons learned was that SCAG needs to do a better job demystifying the planning process and how the public fits into the feedback loop. We would recommend continuing to fund CBO's to conduct workshops such as a primer/introduction to elements of a general plan, the roles ofpublic agencies, and others. Providing learning and feedback sessions outside of theRTP/SCS update period as well as progress reports on goals, would create stronger relationships. This recommendation would be especially useful in traditionally underserved communities and communities who have had less opportunities to engage with SCAG or its member agencies.	Thank you for your comment. SCAG intends to continue to coordinate with CBOs in the region to conduct ongoing deep and sustained engagement.

ID	Comment	Response
<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001492 Related Documents Link
0001492.08	2. Connect SoCal should develop a funding guide: SCAG should compile a technical assistance guide to funding opportunities that includes grant sources to fund policies described in the plan. Many of the model policies in Connect SoCal plans offer solutions to some of the most challenging planning issues. However, many jurisdictions, especially smaller and rural agencies lack the funding to act on developing policies. Connect SoCal should list funding opportunities and offer technical assistance to write grants.	Thank you for your comment. Appendix 6 of the Active Transportation Technical Report details funding opportunities currently available in the region. SCAG recognizes the need for additional technical assistance for communities in the region to successfully compete for grants and is working to identify strategies to provide additional assistance. Please contact us if you are aware of opportunities to engage with and support local communities.
0001492.09	3. Increased investment in active transportation projects: In terms of dollar amounts for active transportation investments, investments have doubled from the previous RTP/SCS. However, the proposed dollar investment percentage only adds up to 3.5% of the budget. The proposed percentage of investment makes it nearly impossible to achieve mode shifts. This proposed investment does not allow our region to meet our SB 375 targets. Given our region's climate goals, we cannot continue to rely on auto travel and need to shift more people to walking, biking, and transit. More aggressive investments would support mode shifts that would make it safer and easier to walk, bike and take transit. Instead, we recommend SCAG commit to investing 5% of the plan's budget to active transportation. By investing 5% into active transportation projects, we can fill the funding and infrastructure gaps in places that have active transportation plans but cannot fund projects. The budget outlined in the plan also shows a breakdown of investments in programming. We recommend prioritizing investments towards projects that include complete streets elements as well as bike and pedestrian improvements in EJ/communities of concern and communities that have high per-capita affordable housing targets under the next Regional Housing Needs Allocation cycle.	Thank you for your comment. SCAG supports increased levels of funding for active transportation and is committed to supporting jurisdictions in the region with applications for funding through programs highlighted in the Active Transportation Technical Report.
0001492.10	4. Assure that investments in active transportation projects will not result in increased policing: As stated above, we are excited to see investments reflect needed improvements for biking, walking, and public transportation. However, given the concentration of high-risk streets in low-income neighborhoods of color, we also demand that those dollars not be spent on policing but on genuine evaluation, engineering, education, and engagement efforts that shift the dynamics from car-centric travel to a diverse range of safe options. Part of ensuring this safety is reducing police interactions with vulnerable community members.	Thank you for your comment. Language has been added to the Safety Strategies section of the Active Transportation Technical Report to address the need to reduce negative police interactions.
0001492.11	5. The plan should include a community engagement checklist and elevate universal design principles for active transportation projects: We recommend that active transportation projects funded by SCAG grants should meet a checklist of community engagement standards, as well as universal design principles. SCAG should establish community engagement standards that ensure outreach includes diverse underserved populations and are language accessible. We also recommend that SCAG prioritize investing in projects that adopt universal design standards. Universal design principles ensure projects include accessibility features for all types of users, including users with disabilities. SCAG can also provide policy recommendations on how to incorporate universal design principles in projects that go beyond the minimum ADA requirements for sidewalks.	Thank you for your comment. SCAG supports the all ages and all abilities approach consistent with universal design principles. Further, SCAG continues to support community engagement principles that exceed the more traditional community outreach approach; including partnerships with community based organizations that allow community members to lead community engagement efforts in the primary language of the community. SCAG also recognizes that each community is unique and the community engagement approach should reflect enough flexibility to allow the approach to match the community. Finally, SCAG recognized the need for continued efforts in this area and is actively working to identify and develop better tools and processes to improve community engagement in the region.

ID	Comment	Response
<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001492 Related Documents Link
0001492.12	<p>6. Change the plans' focus to prioritize transit investments over freeways and reduce emphasis on highway expansion: Freeway expansion is very much a focus in the plan, especially for counties outside of Los Angeles (including the Inland Empire and Orange Counties). Freeway expansion is mainly due to the compounding factors of goods movement and the housing and jobs mismatch. The plan should turn its attention to affordable housing projects, complete streets, and transit while avoiding all policies that promote freeway expansion and sprawl. The plan should prioritize transit and active transportation investments in communities that have high per-capita affordable housing targets under the next Regional Housing Needs Allocation cycle.</p>	<p>Thank you for your comment. Investment in complete streets is a key component of Connect SoCal and is included as one of the six "Core Vision" strategies in the Plan. The SCAG region has many diverse transportation needs and the Connect SoCal balances those needs with an eye towards creating a multi-modal, and sustainable transportation network. Additionally, Connect SoCal achieves its varied objectives by encouraging infill and new development that is integrated with existing transportation infrastructure, including active transportation and transit investments.</p>
0001492.13	<p>Environmental Justice7. SCAG needs to prioritize funding environmental justice plans, including climate resiliency plans for DACs and the SB 1000 EJ element: As mentioned above, the inclusion of the EJ toolbox is a step in the right direction to help agencies address climate change impacts. Although the toolbox includes many strong policy recommendations, the toolbox fails to provide avenues for funding. In addition to providing a funding guide, SCAG needs to play a stronger role in providing technical support for plans related to environmental justice and resiliency plans in EJ areas. More agencies need funding and technical support to develop and implement such plans. SCAG should seek funds and invest in environmental justice planning support as well as climate resiliency plans. SCAG's Sustainable Communities Program would be a prime funding source that could support EJ projects.</p>	<p>Comment noted. Staff will continue to work with SCAG's Environmental Justice (EJ) Working Group and EJ stakeholders to further refine future EJ Toolboxes. The EJ Toolbox is meant to be a dynamic resource document that changes with time so it will have the most relevant information for readers and EJ stakeholders to use.</p>
0001492.14	<p>8. Connect SoCal should address park inequities for environmental justice areas and invest in safe routes to parks/transit to trails: The EJ report documents that inequities of park access create challenges for communities of color and vulnerable populations like elders and children (p. 74). In the case study of access to the San Gabriel Mountains (SGM), SCAG found no transit and limited rail service to the monument. Furthermore, both maps (Exhibit 19: Minority Distribution Overlaid with Natural lands and Local Parks, and Exhibit 20: Low-income households with Natural Land and Local Parks) depict severe park inequities, especially in the Inland Empire and parts of South and East Los Angeles County. These tables are not easy to interpret but it does present a bleak picture of park access. The accompanying tables depict the majority of our region faces transit trips that are upwards of 45 minutes to local parks ornatural lands. Given this data, SCAG should invest in studies similar to the SGM case study, invest in rapid transit/AT to parks projects, transit to trails programs, and develop a multi-jurisdictional strategy for park access. CBO's can play a big role in providing feedback on strategies for safe routes to parks that include transit and active transportation projects. Furthermore, SCAG should encourage non-infrastructure programs such as Safe Routes to School and Go Human include education and encouragement strategies for park accessibility.</p>	<p>Comment noted. The Environmental Justice (EJ) Technical Report is focused on certain communities within the region, specifically areas with low-income and minority populations. This study evaluated whether Disadvantaged Communities, Environmental Justice Areas, or Communities of Concern were negatively impacted by the plan, compared to the SCAG Region as a whole. Table 25 and Table 26 indicate that in almost every instance, the Connect SoCal Plan (PL) outperforms the Baseline(BL)/Trend, creating more accessible parks and open-spaces for 2045.SCAG recognizes the need for increased funding for active transportation projects and will continue to support member jurisdiction applications for grant funding. Additionally, SCAG supports efforts to increase funding for active transportation projects at the local, state, and federal levels. Current available funding sources can be found in Appendix 6 of the Active Transportation Technical Report. Furthermore, SCAG understands the importance of Go Human and Safe Routes to School Programs. The Active Transportation Technical Report delivers in-depth information regarding SCAG's Go Human Campaign. For more information on Go Human efforts, please visit Go Human website.</p>

ID	Comment	Response
<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001492 Related Documents Link
0001492.15	<p>9. The Environmental Justice Technical Report should be more greatly aligned with other reports of the plan: The Environmental Justice Technical Report should more explicitly align with other sections of the Plan that focus on equity. For example, the Public Health Technical Report focuses on the Social Determinants of Health yet these are barely mentioned in the Environmental Justice Technical Report. In order to promote greater coordination and collaboration between the practitioners and stakeholders who will ultimately be responsible for implementing this plan, these sections should be better aligned and reflect the data, strategies, goals and other elements identified in each section.</p>	<p>Comment noted. The Environmental Justice (EJ) Technical Report is focused on certain communities within the region, specifically areas with low-income and minority populations that tend to experience higher exposure and concentration of adverse environmental impacts than the general population. Though the EJ Technical Report does not explicitly reference the Social Determinants of Health, several of the EJ performance indicators address them, including: access to employment, shopping (e.g., grocery stores), and parks/natural lands; the availability of transportation options (e.g., bikeways, transit, etc.); transportation safety; and exposure to emissions (i.e., clean air). The Public Health Technical Report presents an overview of health outcomes for all populations in the SCAG region as they relate to the built environment and the plan’s anticipated impacts. The analysis from both technical reports contributed to the development of Connect SoCal’s multimodal transportation and land use strategies that present numerous opportunities to ensure that investments result in equitable health outcomes and benefit all populations in the region.</p>
0001492.16	<p>10. The Environmental Justice Technical Report needs to elevate the hazards of warehouse freight fleet as one of the biggest threats to community health and safety: We are concerned with the growing number of freight fleets on the road. Considering that diesel particulate matter impacts public health (especially for Inland Empire communities), the EJ report should be better aligned with other appendices. The framing of sustainable growth within the plan applauds the growth of goods movement as a job stimulator. Elevating goods movement within a sustainable growth plan is antithetical to our goals around GHG reduction, anti-displacement strategies, bicycle and pedestrian safety, and environmental justice. The following policy strategies seek to center EJ communities by prioritizing public health:</p>	<p>Comment noted. SCAG staff will consider additional analysis to evaluate goods movement related impacts on Environmental Justice (EJ) communities in the future and will bring that back to the EJ Working Group. Additionally, a Health Risk Assessment (HRA) was prepared for the Connect SoCal PEIR (See Appendix 3.3, Health Risk Assessment Technical Report). The HRA evaluates potential cancer risk as a result of light, medium and heavy duty vehicles along key freeways in the SCAG region.</p>
0001492.17	<p>a. The environmental justice technical report needs to include better data on the health impacts from freight/cargo pollution: The EJ report should include data on community impacts from freight, which should be sourced from partners like the South Coast Air Quality Management District. Additionally, the EJ and Goods Movement reports should include an inventory of existing and planned industrial land use areas that result in the increasing freight truck traffic and idling near surrounding communities, which affect pollution levels but also safety for biking and walking given higher volumes of heavy vehicles. Such an inventory would help advocates and public agencies work together to address impact from freight. Data can also help illuminate policy reasoning for zero emission freight and why we should hold industry accountable to change to clean fleets. This recommendation is especially critical for the Inland Empire, who carries 51.4% of the share of freight networks (p. 15 of the Goods Movement Report).</p>	<p>Comment noted. SCAG staff will consider additional analysis to evaluate goods movement related impacts on Environmental Justice (EJ) communities in the future and will bring that back to the EJ Working Group. Additionally, a Health Risk Assessment (HRA) was prepared for the Connect SoCal PEIR (See Appendix 3.3, Health Risk Assessment Technical Report). The HRA evaluates potential cancer risk as a result of light, medium and heavy duty vehicles along key freeways in the SCAG region.</p>

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<p><i>Submitted by</i> Safe Routes Partnership Submittal 0001492 Related Documents Link</p>		
0001492.18	<p>b. The plan should include a cost benefit analysis of warehouse/cargo industries and accompanying fleet/aircraft: Job creation is often cited as reason for expanding warehouses, but no study has ever been conducted to do a cost-benefit analysis of health impacts and warehouse jobs. SCAG should fund a study conducted by an outside consultant to assess health impacts from freight pollution, workers’ safety, and traffic safety from expanding warehouses against the benefit of job wages. SCAG’s report says the Inland Empire has more low wage jobs than any other area in the region and the report also shows the IE has among the highest concentration of communities of concern and environmental justice areas. We believe a cost benefit analysis would show that expanding warehouses is bad business for community health and does more damage in perpetuating the cycle of poverty. This study should also look at the likelihood of these jobs becoming automated, which would result in even fewer jobs in exchange for the negative impacts.</p>	<p>Comment noted. SCAG staff will consider additional analysis to evaluate goods movement related impacts on Environmental Justice (EJ) communities in the future and will bring that back to the EJ Working Group.</p>
0001492.19	<p>Goods Movement11. Develop stronger traffic safety policy for autonomous cargo vehicles from the goods movement industry: The plan points to trends for increasing technology for autonomous cargo and is likely to become an industry standard. The plan states “Easier goods delivery can reduce the need for additional trips on the individual level, but if not properly planned for, the use of the sidewalk and curb for goods movement could have negative impacts on active transportation needs (p. 53, AT report).” SCAG needs to develop stronger model policies that protect the safety of active transportation users in an increasingly automated world. We also recommend that this issue be a topic for an upcoming active transportation working group that includes goods movement staff.</p>	<p>SCAG agrees that it is critical in a multmodal environment to emphasize safety, particularly for pedestrians. The SCAG goods movement staff would be happy to participate in an upcoming active transportation working group meeting.</p>
0001492.20	<p>12. Include the consideration of public health and fair labor practices as a standard for the Goods Movement vision: The Goods Movement report documents how Connect SoCal promotes the goods movement system vision (p. 6). The outlined vision prioritizes maximizing profit and does not consider mitigating or eliminating public health impacts nor does it consider fair labor practices. We recommend the following principles be added to the system vision:</p>	<p>The vision and supporting statements recognize the importance of quality of life and mitigating impacts on communities. Further clarification has been provided in the referenced section.</p>
<p><i>Submitted by</i> Safe Routes Partnership Submittal 0001496 Related Documents Link</p>		
0001496.01	<p>a. “The promotion of local and regional job creation and retention” principle should include community benefits agreements to ensure labor and public health standards. A community benefits agreement between industry and the surrounding community would allow community members an opportunity to voice their needs.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001496 Related Documents Link
0001496.02	<p>Public Health13. Incorporate and elevate the California Healthy Places Index in the plan: TheCalifornia Healthy Places Index, located at www.healthyplacesindex.org, is an increasingly significant resource for public health, social determinants of health and equity data for use by local, regional and State agencies across California. HPI is used in several statewide grant competitions including the Active Transportation Program and SCAG’s own Sustainable Communities Planning Grants. Connect SoCal should elevate this model tool within the report overall to ensure jurisdiction can turn to the tool as a resource in their planning efforts, as well as the increasing number of State grant programs using it as part of their selection criteria. For example, the public health report includes a mention of HPI on page 13, but without the use of data in any tables, maps or other visualizations like other datasets. We recommend adding HPI maps to strengthen the public health report as well as adding air quality HPI maps in the Environmental Justice report. Given the Plan’s focus on the social determinants of health and health equity, we recommend incorporating HPI score maps, as well as maps of several of the indicators and decision support layers that represent the social determinants of health that are the focus of the Public Health Technical Report, such as housing (Housing Policy Action Area indicators), air quality (Environment Policy Action Area indicators), economic opportunity (Economic Policy Action Area indicators) and Climate Change (Climate Vulnerability decision support layers). We also recommend adding tables with additional public health information available in HPI to the Technical Report. This will ensure that the implementers of this Plan have a wide range of information available as they consider public health and health equity impacts of their decision-making in the region.</p>	<p>Comment noted. SCAG values the utility of the California Healthy Places Index (HPI) tool for local, regional, and state government agencies, as well as community groups. Throughout the Public Health Technical Report, whenever possible, SCAG utilized data tied to the base year of the plan, 2016. This limited the usage of HPI data. HPI is highlighted as an important statewide initiative and resource. To reinforce the tool's value, the Report has been updated to include a map that reflects HPI scores across the region. In the next Plan SCAG hopes to be able to utilize more HPI data.</p>
0001496.03	<p>Climate change14. Elevate the discussion of climate change: We are pleased to see an elevated focus on climate change compared to the last RTP/SCS plan. Climate change will be an increasingly important topic that jurisdictions will need to address. We are concerned that climate change impacts will have a disproportionate impact on communities of color, rural, under resourced, the elderly and children. We recommend the following actions to elevate climate change:</p>	<p>Thank you for your comment. Discussion on climate vulnerability can be found in the Environmental Justice (EJ) Technical Report, which includes a “Climate Vulnerability” performance indicator to analyze climate change related impacts such as substandard housing conditions, high risk sea level rise areas, flood hazard zones and wildfire risk areas on EJ communities. SCAG will continue to work with and gather input from stakeholders on climate change related issues to ensure appropriate analysis and strategies are discussed in future regional transportation plans. Additionally, SCAG is currently finalizing its Regional Climate Adaptation Framework, which will include a Regional Gap Analysis report that identifies regional and local examples of climate adaptation and resilience efforts, as well as implementation gaps. For instance, not all critical infrastructure (e.g. hospitals, power facilities, schools, sewer plants, etc.) have completed or implemented adaptation plans to protect facilities from the effects of climate change. To support this work, SCAG convenes stakeholders via a Climate Adaptation and Resilience Working Group. SCAG anticipates sharing climate adaptation-related tools and toolkits with stakeholders in summer 2020. This current work will inform SCAG's future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, including an emphasis on adaptation and resilience, and the connection to public health and vulnerable populations, in the next plan.</p>

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<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001496 Related Documents Link
0001496.04	<p>a. We recommend that SCAG consider creating a standalone Technical Report devoted to Climate Change in order to provide specific data and strategies for addressing climate change in the SCAG region. Review and incorporation of jurisdiction climate action plans, climate adaptation plans, and/or sustainability plans may help guide the development of a Climate Change Technical Report. In addition, the discussion of climate change focuses on a narrow set of climate-related events such as wildfires and sea level rise. These discussions could benefit from a broader focus on climate adaptation and resilience, especially how they relate to the changing demographics of the region.</p>	<p>Comment noted. Currently SCAG is finalizing its Regional Climate Adaptation Framework, which will include a Regional Gap Analysis report that identifies regional and local examples of climate adaptation and resilience efforts, as well as implementation gaps. For instance, not all critical infrastructure (e.g. hospitals, power facilities, schools, sewer plants, etc.) have completed or implemented adaptation plans to protect facilities from the effects of climate change. To support this work, SCAG convenes stakeholders via a Climate Adaptation and Resilience Working Group. SCAG anticipates sharing climate adaptation-related tools and toolkits with stakeholders in the summer 2020. This current work will inform SCAG's future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, including an emphasis on adaptation and resilience, and the connection to public health and vulnerable populations, in the next plan.</p>
0001496.05	<p>b. In the Public Health Technical Report under the Climate Change Expanded Analysis Section there should be greater emphasis on the importance of active transportation and public transit accessibility as a community climate resilience and health equity strategy, not solely as a climate mitigation strategy (via VMT reduction). Additionally, we recommend the inclusion of an analysis of the potential cost savings of more resilient active transportation and public transit systems in the projected climate scenarios.</p>	<p>Comment noted. SCAG recognizes the importance of active transportation and transit for public health, and that is why the Public Health Technical Report includes strategies and actions for local jurisdictions and partners for advancing the use and access to these modes. For example, the Report includes Strategy 4: Support implementation of transit oriented communities, mixed land uses, green streets strategies, and safe streets for all ages and abilities to maximize opportunities for active lifestyles and access to essential services, and promote increased rates of transit and active transportation to improve air quality. SCAG also acknowledges the need for continuing analyses related to climate change mitigation, adaptation, and resilience.</p>
0001496.06	<p>c. In order to further address the nexus between public health, regional transportation plans, and climate change, we recommend explicitly addressing the public health risks of active transportation modes during extreme heat events, poor air quality days, and wildfire season. Similarly, we recommend including consideration of the importance of transportation needs, especially evacuation protocols, of vulnerable populations (e.g. elderly, disabled, socially isolated) during a climate-related event.</p>	<p>Comment noted. Currently SCAG is finalizing its Regional Climate Adaptation Framework, which will include a Regional Gap Analysis report that identifies regional and local examples of climate adaptation and resilience efforts, as well as the implementation gaps. For instance, not all critical infrastructure (e.g. hospitals, power facilities, schools, sewer plants, etc.) have completed or implemented adaptation plans to protect facilities from the effects of climate change. To support this work, SCAG convenes stakeholders via a Climate Adaptation and Resilience Working Group. SCAG anticipates sharing climate adaptation-related tools and toolkits with stakeholders in the summer 2020. This current work will inform SCAG's future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, including an emphasis on adaptation and resilience, and the connection to public health and vulnerable populations, in the next plan.</p>

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<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001496 Related Documents Link
0001496.07	<p>d. In order to increase the emphasis on climate adaptation and resilience, we recommend including current regional, local, and community-based climate resilience efforts within the Existing Conditions section, specifically the sub-sections that are directly related to climate change (e.g. Access to Parks and Open Space, Air Quality, Smoke and Wildfires, etc.). Similarly, we recommended the inclusion of more specific data related to the disproportionate burden faced by low-income and communities of color due to current and future climate impacts (e.g. poor air quality, asthma rates, homes in inundation areas, etc.).</p>	<p>Comment noted. Currently SCAG is finalizing its Regional Climate Adaptation Framework, which will include a Regional Gap Analysis report that identifies regional and local examples of climate adaptation and resilience efforts, as well as implementation gaps. For instance, not all critical infrastructure (e.g. hospitals, power facilities, schools, sewer plants, etc.) have completed or implemented adaptation plans to protect facilities from the effects of climate change. To support this work, SCAG convenes stakeholders via a Climate Adaptation and Resilience Working Group. SCAG anticipates sharing climate adaptation-related tools and toolkits with stakeholders in the summer 2020. This current work will inform SCAG's future planning efforts. Specifically, SCAG will consider developing a standalone technical report on climate change, including an emphasis on adaptation and resilience, and the connection to public health and vulnerable populations, in the next plan.</p>
0001496.08	<p>e. We applaud the thoughtful consideration of the plan implementation strategies and actions. We propose the inclusion of HPI as a strategic tool to further Strategy 2, Action D. In order to advance the goals of Strategy 2 for Local Jurisdictions and Partners, and Strategies throughout the Plan and Technical Reports, we recommend including explicit language about providing financial support to community-based partners and community members for their engagement in stakeholder meetings and coalitions throughout the continued refinement, implementation, and evaluation of the Plan.</p>	<p>Commented noted. SCAG values the utility of the California Healthy Places Index (HPI) tool for local, regional, and state government agencies, as well as community groups, and looks forward to continuing identify ways to encourage more access to public data and related analyses. SCAG also values the engagement of its community-based partners and community members and will work to identify ways to continue to encourage their participation in regional plans, projects, and programs.</p>
0001496.10	<p>Connect SoCal Data15. Improve data collection: Data collection is a critical avenue for jurisdiction to analyze current and projected planning needs. We recommend the following strategies and considerations to improve data collection: a. We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the "Daily amount of walking and biking related to work and non-work trips" and the "Collision rates by severity and mode." We encourage cities and counties to collaborate with SCAG, Public Safety Departments, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts and benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes.</p>	<p>Comment noted. SCAG recognizes the need for additional data for more robust evaluation of the impacts of active transportation. The Active Transportation Technical Report includes an "Actions for Data Collection" section that highlights steps that SCAG will take to expand available data for more in-depth analysis in the future. For example, SCAG intends to update and maintain the Active Transportation Database and expand its functionality, while continuing to work with jurisdictions to increase the active transportation count data reflected within the database.</p>
0001496.11	<p>b. In order to provide more information and context to local jurisdictions, we recommend including additional data and evaluation strategies related to the impacts of active transportation, including; an analysis and model of the safety impacts of active transportation; a return on investment analysis for investments in active transportation infrastructure and technology; and a recommendation to systematically install automated counters along bike paths and other active transportation thoroughfares.</p>	<p>Thank you for your comment. SCAG recognizes the need for additional data for more robust evaluation of the impacts of active transportation. The "Actions for Data Collection" section of the Active Transportation Technical Report highlight steps that SCAG will take to expand available data for more in-depth analysis in the future. Additionally, SCAG is working with jurisdictions to increase the active transportation count data through the Active Transportation Database.</p>

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<i>Submitted by</i>	Safe Routes Partnership	Submittal 0001496 Related Documents Link
0001496.12	c. We also urge SCAG to establish more meaningful targets for many of the goals in the Plan other than “improvement over baseline.” While the Plan touts the benefits of making the proposed transportation investments, this Plan covers a long range of time where more ambitious targets could be established and strived for by SCAG and its member cities and counties. The target-setting process for the Federal Highway Administration’s Safety Performance Measures was a good standard to follow and should be considered for other goals in the Plan, so we have greater accountability for meeting these goals. SCAG should also issue regular (at least every two years) reports identifying progress towards these targets.	Thank you for taking the time to review and comment on the Draft Connect SoCal. Your comments regarding the value of developing more robust performance targets in support of our regional public health and safety goals are very much noted. For purposes of the Connect SoCal, the performance measures are designed to assess the impact of the RTP/SCS on a select number of outcomes supportive of Connect SoCal goals, which include the promotion of healthy and equitable communities. For purposes of on-going performance monitoring in the SCAG region, your suggestion for biennial reporting of interim progress toward achieving our regional objectives is a strategy that may be considered.
0001496.13	16. Connect SoCal plan should have an interactive data site: The plan contains a rich amount of data ranging from public health, environmental justice, housing and active transportation. Much of the data is referenced from SCAG’s GIS open data portal, however it is not an accessible interactive source for the public. We recommend a few strategies to help make this data become more digestible for public consumption:	Thank you for your comment. Much of the data listed in this comment is currently available on the Active Transportation Database. Additionally, SCAG is in the process of further developing our publicly available, online data tools. This program is known as the Regional Data Platform, and will continue to be developed in Fiscal Year 20/21.
0001496.14	a. Offer tutorials for how the public can engage with the GIS open data portal (A potential group of interested parties could be CBOs who contributed in ConnectSoCal community outreach, city and county staff).	Thank you for your comment. Much of the data listed in this comment is currently available on the Active Transportation Database. Additionally, SCAG is in the process of further developing our publicly available, online data tools.
0001496.15	b. Connect SoCal should have interactive features that showcase data used in the plan and that is easily downloadable for the public. At an EJ working group meeting, staff mentioned that an interactive data feature for the EJ report is a possibility. We recommend to expand this idea to include the Connect SoCal plan’s other technical reports and solicit feedback on its accessibility from the working groups.	Thank you for your comment. Much of the data listed in this comment is currently available on the Active Transportation Database. Additionally, SCAG is in the process of further developing our publicly available, online data tools through the Regional Data Platform program.
0001496.16	<p>Again, thank you for the opportunity to submit comments for the Connect SoCal RTP/SCS 2020 update. We look forward to working with you and SCAG staff on the inclusion and implementation of these policy recommendations. We are available to discuss any of these recommendations further upon request. We look forward to the implementation of the best version of the Connect SoCal plan that ensures we are planning for healthier futures. Respectfully,</p> <p>Demi Espinoza Senior Equity & Policy Manager Safe Routes Partnership Jesi Harris Inspiring Growth Manager People for Mobility Justice John Yi Executive Director Los Angeles Walks Chanell Fletcher Executive Director</p> <p>Climate Plan Esther Rivera Deputy Director California Walks Kristopher Fortin Project Director Santa Ana Active Streets Rebecca Zaragoza Senior Policy Advocate Eastern Coachella Valley Leadership Counsel for Justice and Accountability Allen Hernandez</p> <p>Executive Director Center for Community Action and Environmental Justice Jose Trinidad Castaneda Orange County Climate Justice Organizer Climate Action Campaign David Diaz Executive Director Active San Gabriel Valley Carter Rubin Mobility and Climate Advocate Natural Resources Defense Council Marven Norman Executive Director Inland Empire Biking Alliance Eli Akria Kaufman Executive Director Los Angeles Bicycle Coalition Bryn Lindblad Deputy Director Climate Resolve Denny Zane Executive Director Move LA Cesar Covarrubias Executive Director The Kennedy Commission</p>	Thank you for your comments.

ID	Comment	Response	
<p><i>Submitted by</i> San Bernardino Community College</p>			
0001320.01	<p>There is a need for ongoing feedback, input and suggestions from potential ridership as well as BRI Geographical data and real time big data coming from ridership</p>	<p>Submittal 0001320</p>	<p>Related Documents</p>
<p><i>Submitted by</i> San Bernardino County Transportation Authority</p>			
0001308.01	<p>SBCTA has identified two projects that we would like to further amend and include into the 2020 RTP/SCS:20190010 (RTP ID: 4120198) – Mt. Vernon Bridge widening over I-10. We request a delay of the completion date until 3/1/2024.20190903 (RTP ID: 4122006) – I-15 Express Lanes (Contract 2). We request a delay of the completion date until 12/31/2030.</p>	<p>Submittal 0001308</p>	<p>Related Documents</p>
<p>Comment noted. The requested modifications to completion years have been made to 20190010/4120198 and 20190903/4122006 in the Project List Technical Report.</p>			

ID	Comment	Response
<i>Submitted by</i>	San Bernardino County Transportation Authority	Submittal 0001502 Related Documents Link
0001502.01	<p>The San Bernardino County Transportation Authority (SBCTA) and San Bernardino Council of Governments (SBCOG) appreciate the opportunity to provide comments on the Southern California Association of Governments' (SCAG's) draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and draft Program Environmental Impact Report (PEIR). Both documents have been very professionally prepared, with substantial input over the last several years from County Transportation Commissions (CTCs), councils of governments (COGs), local jurisdictions, other transportation agencies, advocacy groups, and the public. We appreciate the working relationship we have had with SCAG to bring the 2020 RTP/SCS to this point in its development. We look forward to the Regional Council's approval of the RTP/SCS in April and receiving subsequent federal approval for air quality conformity. Our comments can be classified into three general themes: -A summary of SBCTA's sustainability activities over the last several years -Overall perspectives on the 2020 RTP/SCS -Specific comments on the content of the draft RTP/SCS and PEIR (Attachment 2) and a list of edits to the San Bernardino County portion of the RTP/SCS Project List (Attachment 3) SBCTA AND SBCOG SUSTAINABILITY INITIATIVES As you are aware, SCAG and SBCTA jointly executed a Sustainability MOU in 2014 titled "Collaboration between SBCTA and SCAG to Implement the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy." Although the MOU itself has become dated at this point, it is important to recognize that SBCTA and our local partners (transit agencies and local jurisdictions) are proactively pursuing sustainability initiatives throughout San Bernardino County. These activities represent important contributions to sustainability region-wide, and we thought it would be appropriate to highlight some of these in our comment letter on the RTP/SCS. The San Bernardino Countywide Vision is a centerpiece of our sustainability activities. The Vision was adopted by the County of San Bernardino and SBCTA members in June 2011, well prior to the execution of the Sustainability MOU with SCAG. The Vision is very consistent with the direction of the RTP/SCS and gave San Bernardino County an important foundation for the activities that have been undertaken since that time. Extensive information is available on the Countywide Vision site at http://cms.sbcounty.gov/cao-vision/Home.aspx. In brief, the following are recent and ongoing sustainability initiatives of SBCTA and SBCOG: -Transit investments – Over \$600 million is being invested in high-capacity transit infrastructure over a 10-year period, an extraordinary investment for a county generally thought to be suburban, with just over 2 million residents. - Joint report with SCAG: "Customer-Focused, Technology-Enabled Multi-Modalism Action Plan," completed in 2018 and containing 16 targeted initiatives for transit, transportation demand management (TDM), and active transportation in San Bernardino County. - Active transportation – we have delivered or are in the process of delivering over \$50 million in State Active Transportation Program grants, together with our local partners. - Expansion of the SBCTA rideshare/vanpool program (in progress) - Zero-Emission Vehicle Readiness and Implementation Plan (completed 2019) - Countywide GHG Reduction Plan and EIR (completed in 2014 and in the process of being updated to address SB 32 goals for GHG reduction) - Regional Energy Partnership- Climate Adaptation Plan and Partnership with Western Riverside COG (Plan will be complete in February) - Healthy Communities Best Practices Toolkit - Preparation of a Regional Conservation Investment Strategy (RCIS), pursuant to AB 2087 – Draft has been prepared, and is being refined using a Wildlife Conservation Board grant. - SB 743 Countywide VMT Implementation Study</p>	Thank you for your comments on Connect SoCal and its associated PEIR. Comments noted.

ID	Comment	Response
<i>Submitted by</i>	San Bernardino County Transportation Authority	Submittal 0001502 Related Documents Link
0001502.02	OVERALL PERSPECTIVES ON THE 2020 RTP/SCSPrior to the more detailed comments contained in the attachments, SBCTA has some overall perspectives for how the RTP/SCS can be used to achieve the mobility, safety, and sustainability goals of the region in the coming years. These comments relate to our own Countywide Transportation Plan; perspectives on transit, VMT, GHGs, and a multimodal transportation system; our emerging express lane network; goods movement; and airports.	Comment noted.
0001502.03	SBCTA’s Countywide Transportation Plan and Relationship to the 2020 RTP/SCSSBCTA’s 2015 Countywide Transportation Plan (CTP) is being updated to be consistent with the RTP/SCS. The 2015 CTP outlined a path forward for a sustainable transportation future, laying out an achievable strategy for highway and transit facilities, transit oriented development (TOD), air quality, GHG reduction, freight, airports, transportation demand management (TDM), active transportation, and funding. The CTP analyzes two future scenarios: a “baseline scenario” that assumes traditional revenue sources (generally consistent with what the RTP/SCS defines as “core revenues”) and an “aggressive scenario” (generally consistent with RTP/SCS “Plan” revenues, including the innovative sources identified in the Plan). The projects and programs in the aggressive scenario of SBCTA’s updated CTP are consistent with the lists in SCAG’s RTP/SCS. SBCTA has provided SCAG with technical corrections to the San Bernardino County portion of the RTP/SCS project list in a separate communication so that the changes can be incorporated into the modeling for the final RTP/SCS.	Comment noted.
0001502.04	Need for a Balanced, Multimodal Transportation SystemAs noted above, SBCTA is investing heavily in the transit system, TDM, and active transportation. At the same time, our citizens and businesses remain extremely concerned about living up to the commitments in our Measure I half-cent sales tax. Much of the concern centers around the congestion on freeways, interchanges, and the regional arterial system. We have prioritized interchange improvements and are proceeding to deliver those improvements, having completed eight major interchange projects in the last 10 years. We are well into delivery of 10 additional interchanges and are working with local jurisdictions on strategic ramp improvements. Interstates 10 and 15 are being addressed largely through our managed lane strategy, as described in the next section.	Comment noted.
0001502.05	We appreciate SCAG’s acknowledgement that “given that critical gaps and congestion choke points still exist in the system, improvements beyond those that are operational in nature still need to be considered” (page 73 of RTP/SCS). In other words, the RTP/SCS acknowledges that highway improvements are still necessary, even though most of the attention is being given to trip-reduction strategies, with the goal of reducing GHGs and VMT.	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	San Bernardino County Transportation Authority	Submittal 0001502 Related Documents Link
0001502.06	<p>At the same time, it is important to acknowledge that each individual project should not be expected to reduce VMT. What is important is the impact of the overall strategy. In San Bernardino County, the RTP/SCS shows that VMT per capita is being reduced by 2% through 2045 just with the “baseline” investment and by 5% with the “Plan” investment (see page 122). While this is well below the 15% per capita reduction goal identified by the Governor’s Office of Planning and Research (OPR), it represents billions of dollars of investment in transit and trip reduction measures over that time period and appears realistic for San Bernardino County to achieve. There are two primary points: 1) each project cannot be held to a VMT reduction target, and state/regional agencies should not impose that requirement; and 2) VMT thresholds should be set at levels that are achievable within the bounds of financial capacity and the modal choices that travelers make within the context of their geographic setting.</p>	<p>Thank you for your comments. The performance results presented in the Connect SoCal ‘Measuring Our Progress’ chapter demonstrate the impact of the implementation of the integrated program of projects, plans, and strategies contained in Connect SoCal on various regional performance outcomes, including GHG reduction and VMT. Individual projects are not assessed for their specific contributions to Connect SoCal objectives, including reduced VMT, rather the entirety of the RTP/SCS is evaluated for its programmatic impact on desired regional outcomes.</p>
0001502.07	<p>The RTP/SCS demonstrates how difficult it is to reduce VMT even with many billions of dollars invested in alternative modes of travel. Regionally, the Plan reduces per capita VMT by 9.5% between 2016 and 2045, but the population increases by about 20%. In other words, total VMT can still be expected to increase regionally by about 10%. The VMT increase in the Inland Empire will be more in the range of 25%. The rate of population growth tends to outstrip the per capita reductions that can be achieved, so expectations of VMT reduction need to be tempered with what is realistic.</p>	<p>Thank you for your comment. In response to your observations regarding the VMT reduction levels attainable through Connect SoCal investments, it is agreed that with a continuously growing regional population, now exceeding 19 million residents, the containment of VMT growth and concomitant increase in GHG emissions from motor vehicles presents a major challenge for the SCAG region. The effort to curtail growth in the length and duration of motor vehicle trips in the region is a primary focus of Connect SoCal. While the initial results of this effort may not yet be pronounced, our trajectory for the future is now set toward a decline in per capita VMT and in daily travel delay, ultimately resulting in reduced GHG emissions and a more sustainable future for the SCAG region.</p>
0001502.08	<p>The good news is that GHGs can be reduced even if the absolute VMT increases, following the same path as the region’s remarkable improvement in air quality as population and travel has dramatically increased. This means that, for mobile sources, the path to GHG reduction will largely fall on clean energy production, energy efficiency, technological innovations, and more rapid turnover of vehicle fleets. The GHG analysis in the 2040 California Transportation Plan demonstrated that vehicle and fuels technology will be the primary way in which GHG reduction goals will need to be met. VMT reduction is an appropriate goal, but technology will be the principal path to long term GHG reduction. SBCTA looks forward to partnering with SCAG, the State, and the utility industry to pursue these opportunities, consistent with the initiatives we have mentioned earlier, while also doing what we can in transit and TDM to reduce VMT. We are excited to be involved in the Governor’s “Regions Rise Together” initiative, which recognizes that there are no “one-size-fits-all” solutions as far as transportation management and GHG reduction are concerned.</p>	<p>Comment noted. Connect SoCal includes a number of strategies to achieve the regional per capita greenhouse gas (GHG) reduction target. Please see GHG Reduction Approach in the Sustainable Communities Strategy Technical Report for more details.</p>
0001502.09	<p>Regional Express Lane NetworkAs indicated in the RTP/SCS, SBCTA has two major express lane implementation initiatives: I-10 from the Los Angeles County line to Ford Street in Redlands, and I-15 from the Riverside County line, up the Cajon Pass, through Victor Valley, to just north of the Mojave River. These projects are not only multi-modal projects for passengers, with benefits for buses, vanpools, and 3+ carpools, but they will significantly improve freight mobility as well. Each project includes auxiliary lanes and will take some of the auto travel out of the general purpose lanes.</p>	<p>Comment noted.</p>

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0001502.10	It is noteworthy that the I-10/I-15 interchange, at the heart of Inland Empire logistics activity, is designated as the 15th most critical freight bottleneck in the United States (per the American Transportation Research Institute), and the I-10 and I-15 corridors represent the major gateways from/to Southern California to/from the rest of America. The express lanes will also permit light duty (under 10,000 pounds) commercial traffic. Improvement of these corridors is a win-win for both multimodal passengers and freight, but will need to be staged over the duration of the RTP/SCS.	Comment noted.
0001502.11	One request from SBCTA is that one of the sample projects listed in the HOV section of Table 3.2 on page 77 of the RTP/SCS be swapped out with another from the project list. Please replace the I-210 project (Add one HOV lane in each direction from I-215 to I-10) with an additional express lane project (I-10 Contract 2A – add two Express Lanes in each direction from I-15 to Sierra Avenue). The I-10 project has more visibility, is more short term, and more appropriate for inclusion on the sample list. It has an expected completion year of 2029 and cost of \$700 million. This is consistent with FTIP amendment 19-13. No changes to the master project list are required.	Comment noted. Suggested changes will be considered in the Final Connect SoCal.
0001502.12	Goods Movement SBCTA appreciates SCAG’s analysis of freight bottlenecks, documented in the Goods Movement appendix of the draft RTP/SCS. As you know, San Bernardino County is both benefitted by the logistics industry and at the same time heavily impacted by freight. Three of our freight bottlenecks appear on Exhibit 7: I-10 east of I-15, I-15 south of I-10, and I-15 through the Cajon Pass. This is consistent with the notation earlier about the critical bottleneck on the ATRI “top 100” list at the I-10/I-15 interchange. However, we would request that the 15,000-20,000 AVHD bottlenecks be added to Table 7 on pages 53 and 54, given that these are more “fixable” than many of the bottlenecks to our west, which may have higher delay values but are much more constrained and costly to improve.	The 15,000-20,000 AVHD bottlenecks will be added to the referenced table (a total of 17 bottleneck locations added) in the final Plan.
0001502.13	The San Bernardino County bottlenecks have near-term solutions in the works, and are likely to be strong candidates for freight program funding at the State and federal level. There are only a few of these “second-tier” bottlenecks in the region and could easily be added to Table 7. We would also point out that our freight bottleneck on eastbound I-10 in Yucaipa is one that did not make the delay threshold, but can be addressed at a relatively low cost (\$37 million for a truck climbing lane). We would recommend that the next RTP/SCS include the “feasibility of improvement” as a factor in the bottleneck evaluation, particularly given the competitive nature of freight program funding grants, such as those for SB 1.	Comment noted.
0001502.14	As an additional note, we believe that the regional freight collaboration that has worked so well for our regional project funding through the State’s Trade Corridor Improvement Fund (TCIF) program should be re-invigorated. The collaboration is in a good position to craft a program of freight projects that can be most competitive for State and federal freight program funds.	SCAG intends to continue the Southern California National Freight Gateway Collaboration and efforts in support of its goals.

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0001502.15	<p>AirportsIt should be noted that control over Ontario International Airport (ONT) was transferred from the Los Angeles World Airports to the Ontario International Airport Authority (OIAA) in November 2016. SBCTA and our partner agencies appreciate the regional support that has been provided by SCAG and other agencies around the region, enabling ONT to serve 5.5 million passengers in 2019, the highest level in a decade. We look forward to continuing local and regional efforts to make ONT a truly regional asset.</p>	<p>Comment noted. The first paragraph in the “Ontario International Airport (ONT)” subsection and profile currently reads, “The Ontario International Airport (ONT) is located in the City of Ontario in San Bernardino County. Los Angeles World Airports (LAWA) owned and operated the Ontario International Airport from 2006 to 2016. In 2015, LAWA agreed to terms and conditions for the transfer of the airport to a new airport sponsor, the Ontario International Airport Authority (OIAA)”. SCAG greatly appreciates SBCTA and Ontario International Airport’s (ONT) support with Connect SoCal and other SCAG programs and projects, as well as SBCTA and ONT’s participation on the SCAG Regional Transit Technical Advisory Committee, Aviation Technical Advisory Committee, and other SCAG committees and working groups.</p>
0001502.16	<p>The RTP/SCS shows the projected airport passenger forecasts for 2017 through 2045 in Table 3.3. The Plan shows that LAX and ONT account for 80% of the passenger growth region-wide. LAX is forecast to increase by 42 million annual passengers (MAP) to 127 MAP, or 50% higher than existing. ONT is forecast to increase by 28 MAP to 33 MAP, or about six times the existing passenger volume. The market will ultimately determine how rapidly each airport will grow. However, it would be helpful if SCAG could consider some additional analysis as a way of quantifying airport accessibility. It is suggested that graphics be produced for each of the seven major airports that show travel time contours and the population within each contour. In other words, this would answer the question of how much population is within 15 minutes of each airport, 30 minutes of each airport, 60 minutes of each airport, etc for both peak and off-peak conditions. It would be done for both existing and 2045 to see how airport accessibility might change with changing traffic conditions. Perhaps for the next RTP/SCS an airport accessibility index could be developed. This could be an additional data point for the forecasting of future passenger volumes.</p>	<p>Comment noted. The SCAG Aviation Program is open to including airport travel time, accessibility, and population analyses and graphics for upcoming regional transportation plans and other research initiatives in future efforts. The recommended map, accessibility, and travel time analysis fit within the work that SCAG and other MPOs do on airport ground access. For SCAG and the region to be successful with the proposed data gathering, analysis and monitoring work, it will be critical for SCAG staff to partner with the airports, transportation agencies and commissions, state agencies, and federal agencies.</p>
0001502.17	<p>Secondly, it would be beneficial to have SCAG compile regular monitoring data for all the airports in Southern California, perhaps on an annual basis, using the FAA Air Traffic Activity Data System (ATADS) or other appropriate data sources. This would be useful to just keep tabs on airport growth and operational characteristics region-wide. Finally, it would be useful for SCAG to maintain information on project activity at the airports, focusing on projects geared toward capacity expansion and airport efficiency improvements.</p>	<p>Comment noted. SCAG staff routinely collects and uses the FAA Air Traffic Activity Data System (ATADS), Terminal Area Forecast (TAF), and the Aerospace Forecast, for the RTP and other research initiatives, and is open to using FAA ATADS, TAF, and the Aerospace Forecast for future research efforts. As suggested, SCAG staff is open to addressing some of these airport and airside improvements in future research initiatives and projects, as they often will have a direct or indirect impact on ground access and the surface transportation system.</p>
0001502.18	<p>Programmatic Environmental Impact Report (PEIR)Regarding the PEIR, we appreciate the structure of the document and the mitigation measures. The mitigation measures encourage action, but do not put requirements on the County Transportation Commissions or local jurisdictions, beyond those already required by State or federal law. It also acknowledges that project-level environmental studies will need to be conducted prior to the implementation of any specific project, which is why a lesser level of detail was provided in the PEIR.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001502.19	<p>We have no significant comments on the PEIR. In Attachment 2 to this letter we indicate that it is difficult to match up VMT data between the RTP/SCS and PEIR. It may have to do with vehicle classes included or excluded, but we would request that differences in VMT, GHGs, or other performance measures between the two documents be clearly explained.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001502.20	SCAG also indicates that the PEIR for the RTP/SCS may be useful as a basis for streamlining CEQA clearance for certain types of projects. SBCTA looks forward to collaborating with SCAG to take advantage of this opportunity, where possible.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
<i>Submitted by</i>	San Bernardino County Transportation Authority	Submittal 0001509 Related Documents Link
0001509.02	Attachment 1SBCTA and SBCOG Sample Sustainability InitiativesSBCTA and SBCOG have worked closely with SCAG in implementing and delivering sustainability projects in the region and have affirmed our commitment every four years when SCAG embarks on developing the RTP/SCS. In 2014, SBCTA/SBCOG and SCAG jointly executed a MOU on Sustainability planning efforts and delineated a list of activities demonstrating SBCTA/SBCOG’s commitment to implementing the sustainability elements of the RTP/SCS. Although some project level specifics and programs in the MOU have changed over the years, the main goals and principles have remained and are still applicable and consistent with the latest 2020 RTP/SCS.	Thank you for your comments. Comments noted.
0001509.03	When it comes to San Bernardino County, the San Bernardino Countywide Vision is a centerpiece of our sustainability activities. Although the Vision was adopted by the County of San Bernardino and SBCTA/SBCOG in June, 2011, it still serves as the foundation for the all sustainability efforts in the County. Although the draft Connect SoCal (2020 RTP/SCS) provides an overview of some of these activities region wide, it is useful to provide a more specific status report on San Bernardino County’s sustainability work. (https://www.gosbcta.com/wp-content/uploads/2019/09/SBCTA-Sustainability_FINAL_digital.pdf). Based on Table ES-3 Connect SoCal Goals, here are some examples of sustainability projects from SBCTA/SBCOG that align with the RTP/SCS.	Comment noted.
0001509.04	Connect SoCal Goal #2 “Improve mobility, accessibility, reliability, and travel safety for people andgoods.”Active Transportation Investments Countywide – Agencies are now engaged in delivering bicycle and pedestrian improvements made possible by over \$50 million in State Active Transportation Program (ATP) grants. SBCTA has recently updated its Active Transportation Plan to include a Safe Routes to School element, a Points of Interest element, and a Complete Streets element. A countywide sidewalk inventory project is underway.	Thank you for your comment. SBCTA planning efforts mentioned in this comment have been documented in the San Bernardino County section of Appendix 3 of the Active Transportation Technical Report.
0001509.05	Connect SoCal Goal #3 “Enhance the preservation, security, and resilience of the regional transportation system”Climate Adaptation Partnership with Western Riverside COG – This plan has been initiated to address the potential effects of climate change in Riverside and San Bernardino counties and identify ways to work together to address the challenges. As a result, the Inland Empire has formed a Climate Collaborative consistent with SB 1072 to put policies identified in the Regional Climate Adaptation Plan.	Comment noted.
0001509.06	Connect SoCal Goal #4 “Increase person and goods movement and travel choices within the transportation system.”The Redlands Passenger Rail Project – This is a 9-mile rail line between Redlands and downtown San Bernardino, to be operational in late 2021, using self-propelled trainsets. As part of this project, SBCTA will implement a zero emission passenger rail trainset, a first in North America.	Thank you for your comment. Page 26 of the Passenger Rail Technical Report will be edited per the comment.

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<i>Submitted by</i>	San Bernardino County Transportation Authority	Submittal 0001509 Related Documents Link
0001509.07	Connect SoCal Goal #5 “Reduce greenhouse gas emissions and improve air quality.”Countywide GHG Reduction Plan and EIR – This effort was completed in 2014 and is now being updated to address the State’s 2030 GHG reduction goals under SB 32. The Plan includes the State’s first and only certified PEIR for countywide GHGs and has facilitated adoption of local Climate Action Plans (CAPs).	Comment noted.
0001509.08	Connect SoCal Goal #6 “Support healthy and equitable communities.”Healthy Communities Best Practices Toolkit – The San Bernardino County Department of Public Health created a Strategic Plan for the implementation of Healthy Communities policies. The toolkit, a collaboration between SBCOG and the County, will contain sample policies, resolutions, processes, organizational structure, and lessons learned from agencies that have implemented health-related policies.	Comment noted. The San Bernardino County Department of Public Health's Strategic Plan for the Implementation of Healthy Communities is highlighted within the Public Health Technical Report's SCAG Region County Initiatives.
0001509.09	Connect SoCal Goal #8 “Leverage new transportation technologies and data-driven solutions thatresult in more efficient travel.”Partnerships on Clean Freight – Using a federal DOE grant and state CEC grant, SBCTA partnered with Ryder to place over 200 natural gas fueled trucks into its leasing fleet in Southern California as well as a maintenance facility and two fueling facilities. We are currently working with the BYD, BNSF railroad, and Daylight Transportation to pilot battery electric drayage trucks at Intermodal Yards in San Bernardino and Los Angeles and a distribution facility in Fontana.	Comment noted.
0001509.10	Connect SoCal Goal #10 “Promote conservation of natural and agricultural lands and restorationof critical habitats”Habitat Conservation – San Bernardino County and SBCOG are collaborating on an effort to create a Regional Conservation Investment Strategy (RCIS) through the process established by the California Department of Fish and Wildlife under AB 2087.	Thank you for your comment. Connect SoCal highlights the San Bernardino County Regional Conservation Investment Strategy in the Natural & Farm Lands Conservation Technical Report.
0001509.11	Aside from the specific activities referenced in the MOU, it should be noted that SBCTA completed its Countywide Transportation Plan (CTP) in 2015 and is being updated to be consistent with the 2020 RTP/SCS. The CTP is built on a foundation of economic and environmental sustainability. It recognizes that mobility and smart land development are needed to sustain the economic growth and competitiveness necessary for survival within the global economy. This economic growth is needed, in turn, to fund the array of statewide and regional sustainability commitments. San Bernardino County must invest in all modes of transportation, including highways, to support its businesses and growing population.	Comment noted.
0001509.12	Please visit SBCTA’s Sustainability page on our website at https://www.gosbcta.com/planning- sustainability/?category=sustainability , including our Sustainability Fact Sheet.	Comment noted.
0001509.13	Attachment 2Additional Comments on the Text of the RTP/SCS (Connect SoCal) Main RTP/SCS Report•Page 18 - Figure 2.2 needs more explanation within the graphic itself. The Y-axis is not labeled. Are these thousands of jobs regionally? May be better presented as percentages of jobs subject to automation.	Thank you for your comment. The graphic has been improved.

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<p><i>Submitted by</i> San Bernardino County Transportation Authority Submittal 0001509 Related Documents Link</p>		
0001509.14	Page 23, second paragraph under Transportation System – The paragraph references Exhibit 2.3, Existing Arterial System. The text refers to express lanes, while the graphic refers to Expressway/Parkway. Needs to be clarified. Also, what criteria were used for inclusion as an arterial? Was this the FHWA designation?	Comment noted. The exhibit is consistent with the Federal Highway Administration's Functional Classification System. Suggested clarifying changes will be considered in the Final Connect SoCal.
0001509.15	Page 27, Exhibit 2.4 – Suggest that I-215 from SR-91 to I-15 be included in the map. Also, there are two intermodal facility dots shown in San Bernardino. Not clear what the second one is.	The truck volumes on I-215 from SR-91 to I-15 fail to satisfy the threshold that used to define the freight corridors for this map. However, SCAG recognizes it as a critical link for goods moving through the region. The two facilities represented by the dots on the map are the BNSF Intermodal Yard and BNSF Automotive Facility.
0001509.16	Page 30 – Interesting graphic on mode of access to airports. Define “on-call.” Is that where TNCs are included? Please clarify.	Comment noted. “On-call” in Figure 4 “Estimated Airport Ground Trips by Mode” will be changed to “Transportation Network Company”.
0001509.17	Page 31 – Grey text is hard to read in the electronic version. Needs more contrast.	Comment noted. Upon review of page 31 and the entire electronic version of the Technical Report, no grey text was found. The issue with the electronic version may be associated with different monitor settings, including contrast. A note will be provided to the SCAG graphics team regarding potential issues with text and contrast across different computer monitors.
0001509.18	Page 37 – Graphic should say annually, for number of injuries and fatalities.	Comment noted. Changes will be reflected in the graphic.
0001509.19	Page 59, Under Progress Since 2016 – Refers to “Three roadway improvement/rehabilitation projects, including bridge improvement have already been programmed.” There have to be many more projects than that around the region. Referencing only three projects is very underwhelming. It would seem that a number of the “Progress Since 2016” sections could be improved.	Comment noted. Proposed revisions will be considered in the Final Connect SoCal.
0001509.20	Page 61 – You may want to caveat the mileage-based user fee discussion, to be clear that no specific plans have been made to implement such a system at this time, and that implementation would need to occur on a statewide basis.	Thank you for your comment. Please refer to the Transportation Finance Technical Report for a detailed discussion of funding sources. Table 4 details availability assumptions and risk assessment for a mileage-based user fee.
<p><i>Submitted by</i> San Bernardino County Transportation Authority Submittal 0001511 Related Documents Link</p>		
0001511.01	Page 66 – Please re-orient the list of transit projects for San Bernardino from shorter term to longer term and please omit the Foothill/San Bernardino BRT from the list. That project is too long term. So the list would be in this order: Redlands Passenger Rail, West Valley Connector Phase 1, Gold Line Extension to Montclair, and Passenger Rail Service from San Bernardino Metrolink Line to Ontario Airport.	Thank you for your comment. Page 66 of the Transit Technical Report will be edited per the comment.
0001511.02	Page 77 – I-15 Express Lane segment 5 – take out reference to High Desert Corridor and say “to north of Mojave River.” For long range projects like this, it would be adequate to round the costs off to the nearest million.	Comment noted. Proposed changes will be incorporated in the Final Connect SoCal.
0001511.03	Page 102, Figure 4.7 – If it is possible to add dash patterns to similar-color lines, that would be helpful in distinguishing the operators from one another.	Thank you for your comment. Proposed revisions will be considered in the final Connect SoCal.

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0001511.04	Page 103, Table 4.3 – Title should state that the revenue forecast covers both capital and operating/maintenance costs. The numbers would be very large for only capital costs, so clarifying that O&M costs are included would reduce the number of questions.	Comment noted.
0001511.05	Page 122 and throughout Table 5.1 – It is important to clearly distinguish when statistics include light duty vehicles only, versus all vehicles. For example, the GHG per capita targets for SB 375 purposes relate to light duty vehicles only. On page 122, the basis of the VMT data is unclear. It is clarified as light duty in Table 5.1, but should also be stated on page 122 and on Figure 5.1 as well. Same with daily minutes of delay. Is that person delay or vehicle delay, and which vehicle sectors are included? The definition of VMT is also critical to distinguish for SB 743 purposes, to avoid confusion. We did not see where total VMT statistics are presented. Truck delay by facility type is presented, but we did not see truck VMT within the main body of the RTP/SCS or in the Goods Movement appendix. Also, we could not match the VMT data in the RTP/SCS with the VMT data in the PEIR. Perhaps the differences are because of the inclusion or exclusion of vehicle types. Please review these sections to make sure the references are always clearly explained.	Thank you for taking the time to review and comment on the Draft Connect SoCal. Your recommendations regarding the provision of enhanced clarity for data items, such as VMT per capita, that are applicable to specific vehicle classes, will be applied in the Final Connect SoCal as needed. Additionally, VMT results presented in other sections of the plan will be reviewed to ensure consistency throughout Connect SoCal, or otherwise appropriately referenced.
0001511.06	Goods movement appendix•Page 50 – Please add more truck volume data points in the Inland Empire. Volumes in the I.E. are not well represented, given the role of the IE in goods movement.	Truck volumes have been added to the map with the latest model results.
0001511.07	Page 51 – See comments within the text of the letter on the bottleneck relief strategy.The likelihood and cost of fixing the bottlenecks should be factored into the bottleneck relief strategy, not just the sheer magnitude of delay. Some bottlenecks have massivedelays, but there are practical and cost limitations to relieving that congestion.	The final table has been updated to include more bottleneck locations in the Inland Empire.
0001511.08	Page 61 – SBCTA supports the language in the first bullet regarding working with the federal government on a low NOx engine standard for heavy-duty trucks. We signed onto the ultra low-NOx petition several years ago, along with SCAQMD and CARB. The standards should be developed at the national level, given the amount of travel through San Bernardino County by out-of-state trucks. Having a California-only standard could disadvantage our businesses further and will not be as effective. California and our region should strive for a level playing field as part of our air quality strategy.	Thank you for your comment. SCAG is also supportive of strong national standards for clean vehicles. We also support the state's ability to create standards within their jurisdiction when waiting for federal standards.
0001511.09	Page 94 – The South Archibald grade separation is planned, not complete.	The status of this grade separation has been updated.
0001511.10	Attachment 3Comments on the Draft 2020 RTP/SCS Project List (note: costs are in \$1000s; current RTPentry was copied directly from Table 2 of Project List Appendix)	Comment noted.
0001511.11	1. LOCAL HIGHWAY SAN BERNARDINO, COUNTY OF 200837 0 VISTA ROAD 0 0 VISTA ROAD GRADE SEPARATION-WIDEN 2-4 LANES AND CONSTRUCT GRADE SEPARATION (PA&ED ONLY) 2030 \$50,000 – Comment: Change cost to \$4,000 (\$ in1000s), since PA&ED only	Comment noted. Project 200837 has been revised to reflect a project cost of \$4,000 (\$ in 000's) as requested.
0001511.12	2.LOCAL HIGHWAY SAN BERNARDINO COUNTY 4120193 0 VARIOUS LOCATIONS VARIOUS TRAFFIC SIGNAL PROJECTS THROUGHOUT SAN BERNARDINO COUNTY2023 \$519,912 – Comment: should have a completion year of 2040; costs should be \$5,000.	Comment noted. Project 4120193 has been revised to incorporate the requested modifications.

ID	Comment	Response
<i>Submitted by</i>	San Bernardino County Transportation Authority	Submittal 0001511 Related Documents Link
0001511.13	<p>3.LOCAL HIGHWAY COLTON 4160046 0 MT VERNON I-10 EB RAMPS COOLEY DR WIDEN MT VERNON ACROSS UPRR AND SANTA ANA RIVER FROM 2 TO 4 LANES2025 \$30,000 – Comment: delete, because it is in FTIP as: a.SAN BERNARDINO STATE HIGHWAY 20190010 4120198 10 COLTON: MT.VERNON AVE BRIDGE WIDENING OVER I-10: WIDEN MT. VERNON BRIDGE STRUCTURE (3-4 LANES; 1 NEW SB LANE) TO ACCOMMODATE NEW DEDICATED TURN AND BIKE LANES, WIDEN MT. VERNON AVE (2-4 LANES) FROM I-10 EB OFF/ON-RAMPS TO APPROX. 300 FT SOUTH ALONG MT. VERNON; REALIGN MT. VERNON & E VALLEY BLVD INTERSECTION; RELOCATE WB ON-RAMP (REMAINS 1 LANE AT THE MAINLINE). \$53,869 4. STATE HIGHWAY SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY (SBCTA) 4120198 10 I-10 I-10 MT VERNON AVE I-10 @ MT VERNON AVE INTERCHANGE IMPROVEMENTS 2035 \$38,500 – Comment: Delete, because it is in FTIP as: a. SAN BERNARDINO STATE HIGHWAY 20190010 4120198 10 COLTON: MT.VERNON AVE BRIDGE WIDENING OVER I-10: WIDEN MT. VERNON BRIDGE STRUCTURE (3-4 LANES; 1 NEW SB LANE) TO ACCOMMODATE NEW DEDICATED TURN AND BIKE LANES, WIDEN MT. VERNON AVE (2-4 LANES) FROM I-10 EB OFF/ON-RAMPS TO APPROX. 300 FT SOUTH ALONG MT. VERNON; REALIGN MT. VERNON & E VALLEY BLVD INTERSECTION; RELOCATE WB ON-RAMP (REMAINS 1 LANE AT THE MAINLINE). \$53,869 5.STATE HIGHWAY SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY (SBCTA) 4160004 10 I-10 I-10 GROVE AVE/4TH ST I-10 @ GROVE AVE/4TH ST NEW INTERCHANGE 2045 \$199,000– Comment: Delete because it is in FTIP as: a. SAN BERNARDINO STATE HIGHWAY 2002160 2002160 10 I-10 AT GROVE AVE AND 4TH ST: CONSTRUCT NEW INTERCHANGE AT I-10 AND GROVE AVE; CLOSE EXISTING I-10/FOURTH ST INTERCHANGE; AND LOCAL STREET IMPROVEMENTS ALONG GROVE AVE (CHILD PROJECT IS 20171102). \$199,423 6. STATE HIGHWAY CALTRANS 4200S001 395 US-395 1.8 MI S/O DESERT FLOWER RD FARMINGTON RD WIDEN US-395 FROM 1.8 MI S/O DESERT FLOWER RD TO FAMINGTON RD 2025 \$459,978 – Comment: change date to 2035</p>	Comment noted. Project 4160046 has been removed from the Connect SoCal Project List Technical Report as requested.
<i>Submitted by</i>	San Bernardino County Transportation Authority	Submittal 0001513 Related Documents Link
0001513.01	<p>7.STATE HIGHWAY SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY (SBCTA) 4M01043 215 I-215 I-215 MT VERNON/ WASHINGTON AVE I-215 @ MT. VERNON/WASHINGTON ST INTERCHANGE RECONSTRUCTION 2045 \$109,048 – Comment: Delete, as it is duplicate of:a.LOCAL HIGHWAY CALTRANS 4160072 215 WASHINGTON I-215 WASHINGTONI-215 & WASHINGTON/MT. VERNON; REPLACEMENT BRIDGE PROJECT TO PROVIDE STANDARD VERTICAL AND HORIZONTAL CLEARANCES FOR THE ULTIMATE I-215 ROADWAY. 2023 \$29,252</p>	Comment noted. Project 4M01043 has been removed from the Connect SoCal Project Listing Technical Report as requested.

ID	Comment	Response
<p><i>Submitted by</i> San Bernardino County Transportation Authority Submittal 0001513 Related Documents Link</p>		
0001513.02	<p>8. STATE HIGHWAY SAN BERNARDINO ASSOCIATED GOVERNMENTS (SANBAG)4M07007 210 SR-210 SR-210 BASELINE AVE SR-210 @ BASELINE AVE INTERCHANGE IMPROVEMENTS 2020 \$15,600– Comment: Delete because it is in FTIP as: a. SAN BERNARDINO STATE HIGHWAY 201186 REG0701 210 AT SR-210/BASE LINE IC: RECONSTRUCT/WIDEN BASE LINE BETWEEN CHURCH AVE AND BOULDER AVE FROM 4 TO 6 THROUGH LANES AND EXTEND LEFT TURN LANES, WIDEN RAMPS – WB EXIT 1 TO 3 LANES, WB AND EB ENTRANCES 1TO 3 LANES INCLUDING HOV PREFERENTIAL LANES (EA 1C970) \$31,216 9. STATE HIGHWAY HESPERIA 4M07014 15 I-15 I-15 MOJAVE ST I-15 @ MOJAVE ST NEW INTERCHANGE 2040 \$45,000 – Comment: Delete as it is no longer in the SBCTA Nexus Study, so can be deleted from RTP project list. 10. RTP ID 4120219 Foothill/San Bernardino from San Manuel Casino to Kaiser Hospital (SierraAve. Fontana) – Full BRT 2045 – Comment: Can be deleted, as this route is mostly covered by RTP ID 4120205. – Comment: Please change to 5th St/Baseline from San Manuel Casino to San Bernardino Transit Center – Express Bus 2045 - \$15,000.</p>	<p>Comment noted. The requested revisions have been incorporated into the Connect SoCal Project List Technical Report.</p>
<p><i>Submitted by</i> Save Hobo Aliso Task Force Submittal 0001363 Related Documents Link</p>		
0001363.01	<p>Dear Connect SoCal Team:Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Sierra Club’s Hobo Aliso Task Force is now a part of this growing coalition in 2020. The Hobo Aliso Task Force works in Orange County and has since 2001. Our mission is to protect and preserve finite natural resources and uphold the Coastal Act and other applicable laws and policies that support our mission. We have had important successes since our inception including saving many acres of land from develop, protecting and preserving ESHA and endangered species from poorly planned fuel modification, and implementing crucial restoration projects to bolster the biodiversity in areas that are considered hot spots.We offer the following comments on the Natural and Farmland policy, goals, and next steps. We are pleased to see conservation of our natural and agricultural lands as one of the 10 main policies of Connect SoCal. Land preservation that not only reduces greenhouse gas (GHG) emissions, but also sequesters carbon. Any investment in habitat restoration improves this sequestration potential as well. When land is left in its natural state, no new “vehicle miles travelled” are added to the region’s transportation system. We believe including land conservation is a step in the right direction. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.</p>	<p>Comment noted. Thank you for your comments.</p>
0001363.02	<p>Our organization supports the idea that as new growth occurs it should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	Save Hobo Aliso Task Force	Submittal 0001363 Related Documents Link
0001363.03	<p>However, the Plan fails to outline exactly how (or with what conservation mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved by focusing development elsewhere, doesn't mean the land then automatically becomes protected. We know this is a fact due to multiple experiences our organization has experienced. Numerous organizations, ours included, focus our work on protecting important habitat lands. A lot of time, energy, money, strategy, and political will are combined to create a successful conservation transaction that lead to permanently conserved lands. And once the land is conserved, it needs care and attention, AND ongoing protection. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.</p>	<p>Comment noted. SCAG appreciates and commends the contributions to conservation made by non-profit entities. SCAG will continue to work with the stakeholder group in order to implement conservation strategies listed in Connect SoCal. Suggested mechanisms for conservation are listed in Chapter 3 of Final Connect SoCal as well as in the Natural & Farmlands Conservation Technical Report. Additionally, Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and support long-term management and stewardship of mitigated properties.</p>
0001363.04	<p>Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, protection of cultural and archeological sites, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands also filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water resources. And last, but not least, our future generations must not be forgotten – they too must have open space and parkland. Our children have taken to the streets to let adults know how much they care about the planet, we must support them and make sure we are doing our very best to protect and preserve our finite natural resources.</p>	<p>Thank you for your comment. Comment noted.</p>
0001363.05	<p>The Plan outlines that the region anticipates an additional 3.8 million people by 2045 providing increased pressure to our existing parkland. Existing studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (five acres per 1000 residents). As cities grow, more parks and more park access will be needed. What is the mechanism for this? Additionally, and more importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity activities, like turf soccer and baseball fields. The types of land acquired as mitigation or through local conservation efforts typically focus on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing "more" access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. How additional access will be provided should be addressed, as well as how additional lands will actually be preserved.</p>	<p>Comment noted. Connect SoCal includes a new Regional Advance Mitigation Program (RAMP) initiative that will establish or supplement regional conservation and mitigation banks and other approaches to more effectively address impacts for projects that support reduction of per-capita VMT. The initiative will also support long-term management and stewardship of mitigated properties. Impacts on property management and stewardship can be guided by Connect SoCal's habitat restoration goal, and access to property can be guided by Connect SoCal's goal of improving mobility, accessibility, reliability, and travel safety.</p>

ID	Comment	Response
<i>Submitted by</i> Save Hobo Aliso Task Force		Submittal 0001363 Related Documents Link
0001363.06	Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long-term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land, or they completely ignore the need for these corridors. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors prior to commencing impactful projects.	SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Additionally, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries; and to continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. Habitat Connectivity is also discussed in Section 3.4, Biological Resources of the Draft PEIR.
0001363.07	Many non-profits are working to ensure additional bays, estuaries, wetlands, bluffs, and beaches are preserved forever. Additionally, one way our coasts are connected to inland areas are through our rivers and streams. These riparian areas serve as recreational trail corridors, water recharge and infiltration locations, and serve as places our wildlife use for watering sources. However, transportation and land use generated urban runoff are still problems. Our beaches and coastline are inundated with pollution, and a 303(d) listing is simply not acceptable, and can be prevented. Litter, debris, and pollutants should be decreased prior to reaching the coast. Ensuring everyone has a positive experience on the sand and in the surf should be our goal and is our collective responsibility, but we need to address Southern California's trash and contaminants problem.	Comment noted.
0001363.08	One key way to improve the environment is through restoration projects. Our organization works very hard at finding creative ways to fund and maintain restoration projects. These can be on land, in riparian areas, on the beach, as well as in the ocean. Restoration provides benefits by adding native plants, removing the non-native plants and their seedbank, as well as increasing carbon storage, and providing improved habitats for our wildlife. Our environment benefits from these improvements, as do our watersheds, our air, and our communities. Having improved habitats means that our water is cleaner, our soils won't erode as easily, it creates jobs for local residents, and our unique biodiversity is maintained. Further, the many endemic and threatened/endangered plants and animals benefit from these restoration projects as well. Thank you for including restoration as a key component in the natural lands and agricultural policy.	Comment noted.
0001363.09	Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix.	Comment noted.
<i>Submitted by</i> Save The Rivera		Submittal 0001339 Related Documents
0001339.01	Both the freeways and the arterial roads have deteriorated to mostly gridlock, which is counterproductive to getting to work or to getting to play.	Comment noted. Congestion reduction is a major objective of the Connect SoCal. Major strategies and actions proposed in Chapter 3 are intended to achieve these objectives among other objectives of the plan including improving safety, environment, economy etc.

ID	Comment	Response
<p><i>Submitted by</i> Save The Rivera Submittal 0001339 Related Documents</p>		
0001339.02	This organization has been around for quite a long time, and I see that in the future you have goals you need to meet. My question is: Back in 1978, what happened to those goals in the transportation field? Because they've fallen woefully short.	Comment noted.
0001339.03	The 405 Freeway is a parking lot. The only freeway that's really gotten some attention was the widening of the Harbor Freeway, the 110 Freeway, which was started back in the late '70s/early '80s.	Comment noted.
0001339.04	It scares the hell out of me that all you show is urban skyscrapers when you have your little cartoon of your housing element. I don't want to live in an urban area. I chose to live where I live because I didn't want to live in an urban area, and for the state to mandate that my R1 lot be now an R2 lot with three dwelling units on it wasn't what I signed up for. Your RHNA number and your calculation of that RHNA number is flawed and needs to be re-looked at. You say in your presentation and the board out there in your lobby about rising sea level -- yet, you put all -- you put a very big strain on future housing on the coast. It doesn't add up. So the methodology for the RHNA number needs to be changed, and if it's shifting quote, unquote, to where the jobs are or to where the transportation is, then the tax dollars have to go toward putting a better infrastructure in place, which -- the roadways and the arterial roadways in the South Bay are a disaster. And until that happens, I don't see how you can mandate the state -- whether it's the state, whether it's SCAG or anyone else, mandate an increase in housing. Looking at infill and gentrifying or redeveloping infill is fine, but this huge number that I've seen thrown around that seems to shift everything from the Inland Empire back to the coast is just unrealistic. So it almost sets you up to fail.	SCAG uses state of the practice information and methodologies to forecast the most likely trajectory of growth in the region given known trends and existing policy. While the RHNA is a related planning activity conducted by SCAG which shares some data elements with the growth forecast, ultimately it is a separate process. Regarding your concern about zoning changes, local jurisdictions retain control over zoning designations. The transportation and infrastructure challenges that you mention are important and require cross-boundary collaboration, for which Connect SoCal provides a blueprint. Also See Master Response #1.
0001339.05	Uber, Lyft, and Amazon are all adding to cars on the road which mass transit will never be able to handle or be able to absorb. So let's work on getting the infrastructure of our roadways fixed and upgraded and updated.	Comment noted.
<p><i>Submitted by</i> Service Employees International Union - United Service Workers West Submittal 0001481 Related Documents Link</p>		
0001481.01	Service Employees International Union- United Service Workers West, on behalf of its members (collectively "USWW" or "Commentor"), appreciates the opportunity to comment1 on the referenced draft Program Environmental Impact Report ("PEIR") for the draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy plan ("Plan" or "2020 RTP/SCS"),3 prepared by the Southern California Association of Governments ("SCAG") pursuant to the California Environmental Quality Act, Pub. Res. Code § 21000 et seq. ("CEQA").	Comment noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments of the Final Connect SoCal PEIR.

ID	Comment	Response
<i>Submitted by</i>	Service Employees International Union - United Service Workers West	Submittal 0001481 Related Documents Link
0001481.02	<p>In short, USWW writes with regard to the Plan's air quality analysis and growth forecasts. Concerning is the absence of any modeling under newer EMFAC2017 models that may disclose additional air quality impacts. It is unclear whether the Plan's General Conformity Determination accounts for additional, updated projects that have already been credited with emission budgets under applicable air quality plans. Finally, the Plan's growth assumptions seem untethered to the SCAG region's historic growth record. USWW respectfully requests clarification on these issues in a recirculated or final PEIR.</p>	<p>Comment noted. Connect SoCal is a regional transportation plan and thus is not subject to federal general conformity requirements. For the Connect SoCal transportation conformity analysis, EMFAC2014 is used as allowed by the U.S. Environmental Protection Agency's Transportation Conformity Regulations. The regional growth forecast reflects recent and past trends, key demographic and economic assumptions, and local, regional, state, and national policy in order to present a balanced view of population, household, and employment growth to 2045. Population forecasts from the California Department of Finance and the US Census Bureau are used as references for developing these forecasts. Importantly, SCAG's regional growth forecasting process also emphasizes the participation of local jurisdictions and other stakeholders. Beginning in 2017, SCAG began a rigorous effort to prepare population forecasts for Connect SoCal. The process included an expert review, local input from regional jurisdictions (including through one-on-one meetings with all 197 jurisdictions). For more information on the SCAG forecast methodology, please refer to the Demographics and Growth Forecast Technical Report. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001481.03	<p>I. STANDING OF COMMENTOR USWW and its sister local unions have many thousands of members who reside and work in the SCAG region which this Plan covers. They will be directly affected by impacts under the Plan, such as traffic, air quality, GHG and noise.</p> <p>This comment letter is made to exhaust remedies under administrative law principles and Pub. Res. Code § 21177 concerning the Plan, and incorporates by this reference all written and oral comments, in their entirety, submitted on the Plan or PEIR by any commenting party or agency. It is well-established that any party, as Commentor here, who participates in the administrative process can assert all factual and legal issues raised by anyone.</p>	<p>Comment noted.</p>
0001481.04	<p>II. SPECIFIC COMMENTS REGARDING DRAFT PLAN/PEIR I. Use of EMFAC2014 Rather Than EMFAC2017 Is Concerning It appears that the Plan's air quality, health risk assessment, and GHG analysis utilizes the older EMFAC2014 modeling per the two-year grace period provided by the U.S. EPA for regional conformity analysis. Yet, the newer EMFAC2017 modeling may show more significant air quality emissions that should be translated into human health impacts in order to fulfill CEQA's informed decision-making purposes. <i>Sierra Club v. County of Fresno</i> (2018) 6 Cal. St. 502. So too, it is unclear whether the grace period for using the old EMFAC2014 model applies to the entire 2020 RTP/SCS PEIR analysis or is limited strictly to the federally-required General Conformity Determination ("GCD").</p>	<p>Comment noted. Note that Connect SoCal is a regional transportation plan and thus is not subject to federal general conformity requirements. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001481.05	<p>Commentor requests clarification regarding the utility of the 2020 RTP/SCS PEIR absent an EMFAC2017 modeling. For example, would future addendums to the PEIR include brand new EMFAC2017 modeling? Will future projects after the expiration of the grace period have to do both an EMFAC2014 modeling (to show consistency with 2020 RTP/SCS assumptions) and EMFAC2017 modeling to disclose emissions otherwise undisclosed in this PEIR? What specific mitigation measures are incorporated now to ensure future impacts disclosed pursuant to EMFAC2017 modeling are addressed?</p>	<p>Comment noted. Pursuant to the U.S. Environmental Protection Agency's Transportation Conformity Regulations, EMFAC2014 may only be used for any regional and project-level transportation conformity analysis that starts during its respective grace periods. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	Service Employees International Union - United Service Workers West	Submittal 0001481 Related Documents Link
0001481.06	2. Available General Conformity Determination Emission Budgets Are Not Updated The Plan claims that air emissions associated with the 2020 RTP/SCS are within the air quality emission Budgets under applicable State Implementation Plans ("SIP(s)") and local Air Quality Management Plans ("AQMP(s)"), and thus the Plan satisfies its federally-mandated General Conformity Determination. First, as noted above, this analysis relies on EMFAC2014 modeling under a soon-lapsing grace provision, which may very well leave impacts unanalyzed and unmitigated.	Comment noted. Connect SoCal is a regional transportation plan and thus is not subject to federal general conformity requirements.
0001481.07	Second, the Plan compares Plan emissions against applicable emission Budgets, often finding slim to no emission Budgets remain after deducting the Plan's emissions. It is unclear, however, whether this analysis accounts for recent projects not already included in the applicable AQMP that rely on local General Conformity Budgets. For example, a warehouse logistics project at San Bernardino International Airport just approved in December 2019 exceeded de minimis thresholds and required a GCD under the National Environmental Protection Act. ¹⁰ There, the project relied on set-aside General Conformity Budgets tracked by South Coast Air Quality Management District ("SCAQMD") ¹¹ . As indicated by SCAQMD, SCAQMD tracks projects requiring GCDs that utilize General Conformity Budgets and the Budgets "are in high demand and have a limited availability." ¹² Here, it is unclear whether the Plan's GCD accounts for the recent projects that have already secured these highly sought after General Conformity Budgets.	Comment noted. General conformity does not apply to regional transportation plans, programs, and projects. The Transportation Conformity Analysis only accounts for all regionally significant development projects that have been captured by the Connect SoCal growth forecast which went through an extensive local input and review process as documented in the Demographics and Growth Forecast Technical Report.
0001481.08	Commentor therefore requests clarification whether the Plan and PEIR account for available General Conformity Budgets. For example, do the emission Budgets in the Plan include set-aside General Conformity Budgets? Has SCAG consulted with SCAQMD and other relevant agencies about the updated status of available General Conformity Budgets that are highly sought after by project-proponents? Does SCAG, much less the public, know how much of the Budgets have already been allocated, and how much remains? All this should be provided in a recirculated or Final PEIR.	Comment noted. Connect SoCal is a regional transportation plan and thus is not subject to federal general conformity requirements.

ID	Comment	Response
<i>Submitted by</i>	Service Employees International Union - United Service Workers West	Submittal 0001481 Related Documents Link
0001481.09	<p>3. Growth Assumptions May Lack Substantial Evidence The 2020 RTP/SCS anticipates a significant increase in airplane passenger volume for the SCAG region with passenger enplanements increasing from 110.17 million annual passengers ("MAP") in 2017 to 197.14 MAP in 2045 (i.e., an increase of 86.97 MAP), which amounts to a Compound Annual Growth Rate ("CAGR") of approximately 2.1 percent during those 28 years.B This level of growth is out of line with the area's historic track record and more akin to the trajectory anticipated under old SCAG plans that have proven unreliable. Table 1below shows the anticipated growth in passenger enplanement SCAG-wide under this Plan and prior SCAG plans over their respective planning periods, and historic growth from 1997 to 2017. As the below table indicates, past plans have consistently overestimatedanticipated growth as compared to actual growth (i.e., 1.55 percent actual growth from 1997-2017).</p>	<p>Comment noted. In the "Air Passenger Demand Forecast" subsection of the Aviation and Airport Ground Access Technical Report, the reader will find the sentence, "The annual growth rate of 2.1 percent for the 2020-2045 RTP/SCS region forecast is the 2018 Federal Aviation Administration (FAA) Terminal Area Forecast (TAF) projected annual growth rate for air passenger enplanements at the seven commercial airports in the SCAG region from 2017 to 2045". Therefore, the regional growth projection is determined by the FAA, and the base year (2017) regional airport activity of 110.17 million annual passengers is based on airport activity numbers provided by the airports. The FAA-TAF projection is not determined in relation to past growth rates, but rather is based on a logarithmic regression analysis using updated passenger data, paired with updated economic and airfare forecasts. Furthermore, the FAA-TAF is not "pro" or "anti" growth. Rather, the FAA uses a logarithmic regression analysis, which accounts for airfare and economic forecasts, to determine the TAF growth rates/projections. In the "Analytic Approach" section, you will find the subsection "SCAG Region Air Passenger Forecast", which states, "Both the FAA and AECOM utilized logarithmic regression (i.e. natural log transformations of the dependent and independent variables) analysis to develop their forecasted growth rates. Logarithmic regression analysis is a commonly accepted method for forecasting aviation travel demand by academics, such as Geoffrey Gosling at the University of California Institute of Transportation Studies, and the Transportation Research Board". Furthermore, the subsection also reads, "In addition to logarithmic regression analysis being the standard method for aviation demand forecasting, utilizing the economy and airfare as key explanatory or independent variables for the response/dependent variable of passenger activity/demand is also the generally accepted industry and academic practice. Therefore, the economy and airfare are often used as the two primary explanatory factors or variables in passenger demand forecast modeling. The University of California, Institute of Transportation Studies, and the FAA Terminal Area Forecast (TAF), also use economy and airfare as key variables in their aviation forecast modeling. A healthy economy (usually measured in GDP or personal income) is correlated with increased air traffic. Conversely, the price of airfare is said to be negatively correlated with air travel demand (i.e. as prices increase then demand decreases, as prices decrease then demand increases)". Therefore, the FAA TAF accounts for trends in passenger demand over the 28-year (2017 base year to 2045) time frame through a logarithmic regression analysis, regressing passenger demand on the economy and airfare. The decision to go with the FAA-TAF for Connect SoCal was based on staff analysis and discussion with experts. As noted in the "Comparing Growth Rates" subsection, "In comparison to the growth rates from around the world and the United States, both the AECOM projected growth rate for the 2016 RTP/SCS and the 2018 FAA TAF growth rate for the SCAG region were relatively modest growth estimates. Thus, based on further research and discussion with experts and stakeholders, the decision was made to adopt the 2018 FAA-TAF projected growth estimate (2.1 percent) for passenger enplanements at the seven commercial airports in the region. The adopted growth rate of 2.1 percent for the SCAG region is still relatively low when compared to the forecasted growth rates for other comparable city (e.g. San Francisco), North American (e.g. United States), and international (e.g. Africa, Asia, the</p>

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<i>Submitted by</i>	Service Employees International Union - United Service Workers West	Submittal 0001481 Related Documents Link
0001481.10	<p>The linear trajectory of the above growth projections are reflected in Figure 1 on the following page, which shows the 2045 anticipated growth under the proposed 2020 RTP/SCS (green) is near levels anticipated under the older 2001RTP (blue), 2004 RTP (orange), and 2008 RTP (purple); and much higher than anticipated growth under the newer 2012 RTP/SCS (yellow) and 2016 RTP/SCS (light blue). As compared to historic levels reported by SCAG between 1997 through 2017 (red), those older RTP forecasts overestimated passenger growth significantly. So too, those older plans overestimated growth as compared to the CAGR trajectory based on the actual levels reached from 1997 and 2017 (black).</p>	<p>world), points of comparison. Additionally, 2.1 percent is a slightly more reasonable estimate for the SCAG region when one factors in the airport-level forecasts and constraints, and the long forecast horizon (2017 – 2045)".</p>
0001481.10	<p>The linear trajectory of the above growth projections are reflected in Figure 1 on the following page, which shows the 2045 anticipated growth under the proposed 2020 RTP/SCS (green) is near levels anticipated under the older 2001RTP (blue), 2004 RTP (orange), and 2008 RTP (purple); and much higher than anticipated growth under the newer 2012 RTP/SCS (yellow) and 2016 RTP/SCS (light blue). As compared to historic levels reported by SCAG between 1997 through 2017 (red), those older RTP forecasts overestimated passenger growth significantly. So too, those older plans overestimated growth as compared to the CAGR trajectory based on the actual levels reached from 1997 and 2017 (black).</p>	<p>Comment noted. In the "Air Passenger Demand Forecast" subsection of the Aviation and Airport Ground Access Technical Report, the reader will find the sentence, "The annual growth rate of 2.1 percent for the 2020-2045 RTP/SCS region forecast is the 2018 Federal Aviation Administration (FAA) Terminal Area Forecast (TAF) projected annual growth rate for air passenger enplanements at the seven commercial airports in the SCAG region from 2017 to 2045". The FAA-TAF is not determined in relation to past growth rates, but rather is based on a logarithmic regression analysis using updated passenger data, paired with updated economic and airfare forecasts. Furthermore, the FAA-TAF is not "pro" or "anti" growth. Rather, the FAA uses a logarithmic regression analysis, which accounts for airfare and economic forecasts, to determine the TAF growth rates/projections. In the "Analytic Approach" section, you will find the subsection "SCAG Region Air Passenger Forecast", which states, "Both the FAA and AECOM utilized logarithmic regression (i.e. natural log transformations of the dependent and independent variables) analysis to develop their forecasted growth rates. Logarithmic regression analysis is a commonly accepted method for forecasting aviation travel demand by academics, such as Geoffrey Gosling at the University of California Institute of Transportation Studies, and the Transportation Research Board". Furthermore, the subsection also reads, "In addition to logarithmic regression analysis being the standard method for aviation demand forecasting, utilizing the economy and airfare as key explanatory or independent variables for the response/dependent variable of passenger activity/demand is also the generally accepted industry and academic practice. Therefore, the economy and airfare are often used as the two primary explanatory factors or variables in passenger demand forecast modeling. The University of California, Institute of Transportation Studies, and the FAA Terminal Area Forecast (TAF), also use economy and airfare as key variables in their aviation forecast modeling. A healthy economy (usually measured in GDP or personal income) is correlated with increased air traffic. Conversely, the price of airfare is said to be negatively correlated with air travel demand (i.e. as prices increase then demand decreases, as prices decrease then demand increases)". Therefore, the FAA TAF accounts for trends in passenger demand over the 28-year (2017 base year to 2045) time frame through a logarithmic regression analysis, regressing passenger demand on the economy and airfare.</p>

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0001481.11	<p>As indicated in the above figure, the trajectory of the region's actual track record (i.e., black and red) is relatively low and much more in keeping with the trajectory under SCAG's 2012 and 2016 RTP/SCS growth forecasts, which collectively anticipate passenger volume in 2045 in the range of 145-170 MAP. It would seem that, after 16 years of consistently lowering forecasted passenger volumes in each successive RTP, SCAG is now changing course under an apparent pro-growth plan that may not be supported by substantial evidence.</p>	<p>Comment noted. In the "Air Passenger Demand Forecast" subsection of the Aviation and Airport Ground Access Technical Report, the reader will find the sentence, "The annual growth rate of 2.1 percent for the 2020-2045 RTP/SCS region forecast is the 2018 Federal Aviation Administration (FAA) Terminal Area Forecast (TAF) projected annual growth rate for air passenger enplanements at the seven commercial airports in the SCAG region from 2017 to 2045." Therefore, the regional growth projection in Connect SoCal is determined based on the FAA-TAF. The decision to go with the FAA-TAF for Connect SoCal was based on staff analysis and discussion with experts. As noted in the "Comparing Growth Rates" subsection, "In comparison to the growth rates from around the world and the United States, both the AECOM projected growth rate for the 2016 RTP/SCS and the 2018 FAA TAF growth rate for the SCAG region were relatively modest growth estimates." Thus, based on further research and discussion with experts and stakeholders, the decision was made to adopt the 2018 FAA-TAF projected growth estimate (2.1 percent) for passenger enplanements at the seven commercial airports in the region. The adopted growth rate of 2.1 percent for the SCAG region is still relatively low when compared to the forecasted growth rates for other comparable city (e.g. San Francisco), North American (e.g. United States), and international (e.g. Africa, Asia, the world), points of comparison. Additionally, 2.1 percent is a slightly more reasonable estimate for the SCAG region when one factors in the airport-level forecasts and constraints, and the long forecast horizon (2017 – 2045). The FAA-TAF is not "pro" or "anti" growth. Rather, the FAA uses a logarithmic regression analysis, which accounts for airfare and economic forecasts, to determine the TAF growth rates/projections. In the "Analytic Approach" section, you will find the subsection "SCAG Region Air Passenger Forecast," which states, "Both the FAA and AECOM utilized logarithmic regression (i.e. natural log transformations of the dependent and independent variables) analysis to develop their forecasted growth rates. Logarithmic regression analysis is a commonly accepted method for forecasting aviation travel demand by academics, such as Geoffrey Gosling at the University of California Institute of Transportation Studies, and the Transportation Research Board." Furthermore, the subsection also reads, "In addition to logarithmic regression analysis being the standard method for aviation demand forecasting, utilizing the economy and airfare as key explanatory or independent variables for the response/dependent variable of passenger activity/demand is also the generally accepted industry and academic practice." Therefore, the economy and airfare are often used as the two primary explanatory factors or variables in passenger demand forecast modeling. The University of California, Institute of Transportation Studies, and the FAA Terminal Area Forecast (TAF), also use economy and airfare as key variables in their aviation forecast modeling. A healthy economy (usually measured in GDP or personal income) is correlated with increased air traffic. Conversely, the price of airfare is said to be negatively correlated with air travel demand (i.e. as prices increase then demand decreases, as prices decrease then demand increases). Therefore, the FAA TAF accounts for trends in passenger demand over the 28-year (2017 base year to 2045) time frame through a logarithmic regression analysis, regressing passenger demand on the economy and airfare. The FAA-TAF is not determined in relation to past growth rates, but rather is</p>

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based on a logarithmic regression analysis using updated passenger data, paired with updated economic and airfare forecasts.

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0001481.12	<p>The 2020 RTP/SCS derives its 2.10 percent CAGR growth rate based on factors described only generically and is facially out of line with the region's long-term track record that has seen only a 1.55 percent CAGR in passenger enplanement from 1997-2017. This discrepancy is due, in part, to the Plan's emphasis on recent growth rates from narrow time periods (e.g., 2012-2017 returning to normal levels after sharp declines in the wake of the 9/11 attacks and the Great Recession), based on largely forecasted numbers that have yet to be proven accurate (e.g., 2018-2045), and from jurisdictions that are dissimilar from the SCAG region (e.g., emerging countries like Africa and Asia/Pacific). 16 As a long-term planning document, the RTP/SCS must give adequate weight to the SCAG-region's actual performance over the long-term, such as SCAG's 1.55 percent CAGR from 1997-2017 and the 1.3 percent CAGR from 2000-2017 (i.e., from 88.5 MAP in 2000 to 110.1 MAP in 2017). 17 Furthermore, given that the State and region have experienced ten-years of continued economic growth, a softening of the economy is foreseeable, which will undoubtedly affect passenger travel. This seems to be entirely overlooked by the Plan and PEIR. As such, Commentor requests clarification regarding the adequacy of the Plan's growth projections. For example, what modeling and source data was used to derive this 2.10 CAGR? Why does the Plan/PEIR fail to specify exactly what levels were in prior years? How effective is this model compared to the region's track record? 18 Why is there no consideration for the cyclical nature of the economy?</p>	<p>Comment noted. In the "Air Passenger Demand Forecast" subsection of the Aviation and Airport Ground Access Technical Report, the reader will find the sentence, "The annual growth rate of 2.1 percent for the 2020-2045 RTP/SCS region forecast is the 2018 Federal Aviation Administration (FAA) Terminal Area Forecast (TAF) projected annual growth rate for air passenger enplanements at the seven commercial airports in the SCAG region from 2017 to 2045". Therefore, the regional growth projection in Connect SoCal is determined based on the FAA-TAF. The decision to go with the FAA-TAF for Connect SoCal was based on staff analysis and discussion with experts. As noted in the "Comparing Growth Rates" subsection, "In comparison to the growth rates from around the world and the United States, both the AECOM projected growth rate for the 2016 RTP/SCS and the 2018 FAA TAF growth rate for the SCAG region were relatively modest growth estimates. Thus, based on further research and discussion with experts and stakeholders, the decision was made to adopt the 2018 FAA-TAF projected growth estimate (2.1 percent) for passenger enplanements at the seven commercial airports in the region. The adopted growth rate of 2.1 percent for the SCAG region is still relatively low when compared to the forecasted growth rates for other comparable city (e.g. San Francisco), North American (e.g. United States), and international (e.g. Africa, Asia, the world), points of comparison. However, 2.1 percent is a slightly more reasonable estimate for the SCAG region when one factors in the airport-level forecasts and constraints, and the long forecast horizon (2017 – 2045)". The FAA-TAF is not "pro" or "anti" growth. Rather, the FAA uses a logarithmic regression analysis, which accounts for airfare and economic forecasts, to determine the TAF growth rates/projections. In the "Analytic Approach" section, you will find the subsection "SCAG Region Air Passenger Forecast", which states, "Both the FAA and AECOM utilized logarithmic regression (i.e. natural log transformations of the dependent and independent variables) analysis to develop their forecasted growth rates. Logarithmic regression analysis is a commonly accepted method for forecasting aviation travel demand by academics, such as Geoffrey Gosling at the University of California Institute of Transportation Studies, and the Transportation Research Board". Furthermore, the subsection also reads, "In addition to logarithmic regression analysis being the standard method for aviation demand forecasting, utilizing the economy and airfare as key explanatory or independent variables for the response/dependent variable of passenger activity/demand is also the generally accepted industry and academic practice. Therefore, the economy and airfare are often used as the two primary explanatory factors or variables in passenger demand forecast modeling. The University of California, Institute of Transportation Studies, and the FAA Terminal Area Forecast (TAF), also use economy and airfare as key variables in their aviation forecast modeling. A healthy economy (usually measured in GDP or personal income) is correlated with increased air traffic. Conversely, the price of airfare is said to be negatively correlated with air travel demand (i.e. as prices increase then demand decreases, as prices decrease then demand increases)". Therefore, the FAA TAF accounts for trends in passenger demand over the 28-year (2017 base year to 2045) time frame through a logarithmic regression analysis, regressing passenger demand on the economy and airfare. The FAA-TAF is not determined in relation to past growth rates, but rather is</p>

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0001481.13	<p>Moreover, each SCAG airport is assumed to accommodate this growth at different volumes and at different CAGRs, as reflected in Table 2 below. So too, the Plan anticipates some airports will have significant increases or decreases to their respective regional share of passenger volume.</p>	<p>based on a logarithmic regression analysis using updated passenger data, paired with updated economic and airfare forecasts.</p> <p>Comment noted. For Connect SoCal, SCAG staff did not calculate or assign the airport-level passenger forecasts to the airports. Rather, each airport provided SCAG with their individual long-term passenger forecast number, which was based on each airport’s internal methodology, analysis, and planning. As noted in the “Air Passenger Demand Forecast” subsection, “The airport level forecasts, which were provided directly by the airports, are a reflection of many factors, including the existing physical and institutional constraints at the airports, and individual projections conducted by the airports”.</p>

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0001481.14	<p>In addition to concerns about overstated growth projections, Commentor therefore requests clarification about the timing of these purported MAP increases. For example, how does the PEIR account for and mitigate more severe local impacts that could be caused by accelerated increase in MAP at a particular airport within the first five or ten years of the planning period, instead of evenly spread out over the Plan's full 25+ year time period? Alternatively, in this circumstance how does the PEIR account for disruptions in the Plan's modeled regional share of passenger volume for each airport?</p>	<p>Comment noted. In the "Air Passenger Demand Forecast" subsection of the Aviation and Airport Ground Access Technical Report, the reader will find the sentence, "The annual growth rate of 2.1 percent for the 2020-2045 RTP/SCS region forecast is the 2018 Federal Aviation Administration (FAA) Terminal Area Forecast (TAF) projected annual growth rate for air passenger enplanements at the seven commercial airports in the SCAG region from 2017 to 2045". We believe this is a reasonable growth assumption for the region based on our analysis supported by the input from the Aviation Technical Advisory Committee. The base year (2017) regional airport activity of 110.17 million annual passengers is based on airport activity numbers provided by the airports. As for forecasting methodology, the FAA uses a logarithmic regression analysis, which accounts for airfare and economic forecasts, to determine the TAF growth rates/projections. In the "Analytic Approach" section, you will find the subsection "SCAG Region Air Passenger Forecast" logarithmic regression analysis being the standard method for aviation demand forecasting, utilizing the economy and airfare as key explanatory or independent variables for the response/dependent variable of passenger activity/demand is also the generally accepted industry and academic practice. The PEIR addresses the overall regional demand qualitatively. While the overall regional forecast is calculated using the FAA-TAF, the airport-level forecasts are provided to SCAG by the airports. For the 2020-2045 RTP (Connect SoCal), SCAG staff did not calculate or assign the airport-level passenger forecasts to the airports. Rather, each airport provided SCAG with their individual long-term passenger forecast number, which was based on each airport's internal methodology, analysis, and planning. As noted in the "Air Passenger Demand Forecast" subsection, "The airport level forecasts, which were provided directly by the airports, are a reflection of many factors, including the existing physical and Institutional constraints at the airports, and individual projections conducted by the airports". In summary, the overall regional forecast for the Connect SoCal was calculated using airport activity data and the Federal Aviation Administration Terminal Area Forecast growth rate for the airports in the region, and the individual airport forecasts were developed by the airports and provided to SCAG. To this effect, questions about specific airport impacts and projects, including airport-specific environmental impact studies and reports, should be directed to the airports. However, SCAG does account for the impacts of auto and cargo traffic in its regional travel demand model. As for noise and emissions specifically, please refer to the FAA and the South Coast Air Quality Management District (AQMD) directly. As noted in the Environmental Justice, Aviation Noise Technical Report, the FAA requires airports to maintain and publish aviation noise maps. These maps are accessible at the FAA website. The South Coast AQMD is currently in the process of working with airports in the region on their airport air quality improvement plans. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001481.15	<p>II. SPECIFIC COMMENTS REGARDING DRAFT PLAN/PEIR I. Use of EMFAC2014 Rather Than EMFAC2017 Is Concerning It appears that the Plan's air quality, health risk assessment, and GHG analysis utilizes the older EMFAC2014 modeling per the two-year grace period provided by the U.S. EPA for regional conformity analysis.6 Yet, the newer EMFAC2017 modeling may show more significant air quality emissions that should be translated into human health impacts in order to fulfill CEQA's informed decision-making purposes.Sierra Club v. County of Fresno (2018) 6 Cal.Sth 502. So too, it is unclear whether the grace period for using the old EMFAC2014 model applies to the entire 2020 RTP/SCS PEIR analysis or is limited strictly to the federally-required General Conformity Determination ("GCD").</p>	<p>Comment noted. SCAG will ensure that the Commenter's contact information is added to distribution lists for Connect SoCal and the Connect SoCal PEIR. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<i>Submitted by</i>	Sierra Club Los Angeles Chapter	Submittal 0001470 Related Documents Link
0001470.01	<p>Sierra Club comments submitted to the Southern California Association of Governments on the Connect SoCal 2020 Regional Transportation Plan / Sustainable Communities Strategy. The Sierra Club Angeles Chapter represents over 40,000 members in Los Angeles and Orange Counties. We welcome the regional transportation planning efforts of the Southern California Association of Governments (SCAG). The Connect SoCal 2020 Regional Transportation Plan / Sustainable Communities Strategy is an opportunity for people and governments in Southern California to find region-wide solutions to pressing problems of pollution, congestion, social equity and transportation safety. While it is understood that the SCAG RTP/SCS is largely a compilation of plans of each of the individual county government transportation agencies, SCAG is in a unique position to encourage regionally-minded transportation solutions involving different counties and cities. The comments below are on regional issues which the Sierra Club feel that Connect SoCal 2020 RTP/SCS needs to better address.</p>	<p>Thank you for your comments. Comments noted.</p>
0001470.02	<p>1. Regional transit fare integrationSeamless fare integration of various transit systems across the region will make riding transit easier. The greater convenience of universal fares will encourage more people to ride transit and leave their cars at home. Fare media from Omnitrans, Foothills Transit, RTD, OCTA, LA Metro and other systems should be integrated. Metrolink tickets should also be part of the system, perhaps as an expansion of the existing LA Metro TAP card system. Transit systems around the world are integrating fares, because it just makes sense. The Transit chapter of the 2020 RTP/SCS should advocate for fare integration of transit systems across the SCAG region.</p>	<p>Connect SoCal calls for increasing the convenience of transit services, including better and more fare integration among the many public transit providers in the SCAG region. The Transit Technical Report discusses current efforts in this regard both within the region, through Metro's TAP system improvements, and statewide through the California Integrated Travel Project.</p>
0001470.03	<p>2. Regional cross-county transit lines SCAG is in a unique position to plan and coordinate transit lines which cross county lines. There are some critical cross-county rail transit links which should be addressed in the Transit chapter. Most notably, the West Santa Ana Branch rail project needs to be extended into Orange County. Similarly, the light rail extension to Whittier should be continued to La Habra and Brea.</p>	<p>SCAG has conducted several transit planning studies specifically addressing inter-county travel needs, including along the West Santa Ana Branch Corridor and the Gold Line and Metrolink corridor between Los Angeles and San Bernardino Counties. SCAG will continue to work with its transportation agency stakeholders to identify and advance regional solutions addressing inter-county travel.</p>

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0001470.04	Also worthy of development are extension of Redlands Arrow passenger rail service to Ontario Airport and Downtown Los Angeles, and the extension of the Gold Line east from Montclair to Ontario Airport. (Los Angeles San Bernardino Intercounty Transit and Rail Study).	SCAG, the Los Angeles County Transportation Authority and the San Bernardino County Transportation Authority have conducted planning studies investigating the feasibility of extending the Gold Line from Montclair to Ontario International Airport (ONT), and extending the future Redlands Rail Arrow service west towards ONT and downtown Los Angeles.
0001470.05	3. Transit-Oriented Development The Sierra Club national policy on transportation calls for systems to “minimize the consumption of limited resources, including fuel, and reduce pollutant and noise emissions.” The guidelines for implementation of the policy state that: “Land use patterns should be designed to prioritize walking and biking, reduce vehicle miles traveled (VMT), increase public transit use, enhance the economic viability of public transit and decrease private motor vehicle use (auto mobility).” Infill development, especially for housing, needs to be encouraged by SCAG around transit stations. This is a critical part of the SB 375 Sustainable Communities Strategy (SCS) aspect of 2020 Connect SoCal plan. There needs to be more discussion of transit-oriented development in the Transit chapter.	Transit oriented development strategies are discussed in the Sustainable Communities Strategy Technical Report. Connect SoCal advocates for land use patterns designed to prioritize walking and biking, reduce vehicle miles traveled (VMT), increase public transit use and decrease single occupant vehicle (SOV) travel. Connect SoCal designates Transit Priority Areas (TPAs) and Neighborhood Mobility Areas (NMAS) to encourage multi-modalism in the SCAG region.
0001470.06	4. Reducing emissions from goods movement Clean freight transport in the Southern California region is too often overlooked. It is admirable that the SCAG plan’s Goods Movement report is calling more electric trucks, but alternatives to trucking also deserve attention. Electric freight rail and mode shift of more freight movement from trucks to rail need further study.	Electrification technologies require further evaluation to more precisely address questions about cost, funding and how to best implement such systems with minimal operational impacts. Because of the costs and potential operational challenges associated with mainline electrification, such a strategy should be considered a longer-term initiative, requiring further studies as well as proof of concept and prototype testing of zero emission locomotive technologies that have the potential to minimize cost and operational impacts. Electrification of the rail system in the SCAG region would require the leadership of UP Railroad and BNSF Railway. Electric rail technologies are briefly discussed in Appendix 1 of the Goods Movement Technical Report, entitled Near and Long Term Zero and Near Zero Emissions Technology Opportunities for Trucks and Rail. Due to market forces and the demand for flexibility, still might not lead to a mode shift.
0001470.07	Alternatives to truck transportation are much needed in the Los Angeles metro area, which is afflicted by the worst highway congestion and air quality in the nation. To address pollution and congestion, a mode shift of more freight from truck to rail is critical in Southern California. In particular, short-haul freight rail between San Pedro Bay and the Inland Empire could displace thousands of truck VMT each day. There will be major environmental and energy-savings benefits to short-haul freight rail service. Moving a ton-mile of freight by rail uses 1/3rd to 1/5th the energy (and resulting pollution) compared to truck. This is true whether you are comparing diesel truck to a diesel train, or an electric truck to electric train. California’s goals to reduce greenhouse gas emissions depend on cleaner freight transport, and more rail must be part of the solution.	The San Pedro Bay Ports has witnessed an increasing amount of cargo moved by rail compared to truck, directly resulting from the development of on- and off-dock intermodal rail facilities. Numerous short-haul feasibility rail studies have been completed over the years. Key obstacles to implementation have included willing participation of railroads based on operating economics, and siting for a facility garnering community support. SCAG remains open to facilitating discussions with both private and public stakeholders about the feasibility of a short-haul rail service as appropriate.
0001470.08	5. Highways & Arterials Sierra Club policy is to not support adding freeway lanes. While it is understood that the freeway “Mixed use lanes” projects listed on the table on page 21 of the Highways & Arterials chapter are already “programmed commitments,” it is still a major disappointment.	Comment noted.

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0001470.09	<p>Orange County plans to add one mixed-flow lane in each direction to I-405 from SR-73 to I-605 (by 2026, \$1.9 billion), I-405 from I-5 to SR-55 (by 2034, \$190 million), SR-91 from SR-55 to SR-57 (by 2030, \$456 million), and SR-55 (by 2023, \$327 million). This represents OCTA spending over the next decade of \$3 billion for adding mixed-use freeway lanes, out of OCTA's Next 10 Delivery Plan of \$4.3 billion for freeways. Ventura County add one lane each direction to SR-118 from RT-23 to Tapo Canyon Rd. (by 2031, \$216 million). Imperial County plans to widen SR-111 into a six-lane freeway (by 2030, \$1 billion). All of this freeway expansion capital expenditure proposed over the next decade would be better spent on transit projects and maintaining existing roads.</p>	<p>Comment noted. We believe the Connect SoCal represents a balanced investment across all modes of transportation that would meet the region's broad goals while meeting state mandated GHG reduction targets as well as federal transportation conformity requirements, within our means and political constraints.</p>
0001470.10	<p>6. Emerging Technologies Emission reductions strategies for rail, which are mentioned at the end of the Goods Movement chapter, omit the technology of all-battery-electric locomotives. While a hybrid electric locomotive is mentioned briefly, in practice an all-battery, zero-emissions locomotive can be paired with an existing diesel locomotive to operate as a hybrid pair. This is a viable option for zero-emissions locomotive track miles of operation in the SCAG region, for both passenger and regional freight service. Battery-electric locomotives could also be easily used as switchers in railyards. Such operation within a railyard avoids the operational (locomotive change-out) and range limitations which would make battery operation a challenge for line-haul freight and regional passenger trains. Zero-emissions switcher locomotives would also directly replace existing diesel switchers, which are typically the oldest and dirtiest locomotives in a railroad fleet. These dirty locomotives in urban railyard service have a disproportionate impact on neighboring communities, so replacing them with electric switchers would have significant public health benefits.</p>	<p>A discussion of the battery electric locomotives will be addressed in the Final Connect SoCal.</p>
0001470.11	<p>The 'Goods Movement Technologies' sections of the Emerging Technologies chapter should discuss electric rail, along with new intermodal rail car technologies which will encourage mode shift from truck to rail.</p>	<p>Electrification technologies require further evaluation to more precisely address questions about cost, funding and how to best implement such systems with minimal operational impacts. Because of the costs and potential operational challenges associated with mainline electrification, such a strategy should be considered a longer-term initiative, requiring further studies as well as proof of concept and prototype testing of zero emission locomotive technologies that have the potential to minimize cost and operational impacts. Electrification of the rail system in the SCAG region would require the leadership of UP Railroad and BNSF Railway. Electric rail technologies are briefly discussed in Appendix 1 of the Goods Movement Technical Report, entitled Near and Long Term Zero and Near Zero Emissions Technology Opportunities for Trucks and Rail. Due to market forces and the demand for flexibility, such strategies still might not lead to a mode shift.</p>

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0001538.01	<p>While I appreciate that conservation is one of the top ten goals, I am concerned that I do not see what will happen to make it so that we do not end up with a bunch of urban islands of habitat which will eventually lead to the weakening and death of most wildlife within. There needs to be connectivity over and under all your roads, Expressways Freeways and Boulevards which impede the movement of wildlife. These forms of connectivity must be able to help all forms of wildlife that need to use it to move freely from one area of habitat to another. Below my name is a Press-Enterprise article concerning a two month old court ruling about a housing tract blocking Mountain Lions important movements— please read to the very bottom of it. I found it sad that the Western Riverside County Multi-Species Conservation Plan did not provide the leadership needed to protect this important Mountain Lion crossing and therefore the environmental community did. "No funding for any 15 Freeway crossings has been raised so far." (Press-Enterprise article found below) The words "Connect SoCal" must not only apply to people but to the wildlife which cannot speak for themselves. It therefore must be part of this plan to not only set aside sufficient funds for connectivity over and under new and improved projects, but must also have the all the necessary funds to go back and retroactively build new freeway/rail crossings to provide important linkages for the many different impacted species. City and County jurisdictions cannot be allowed to impede this much needed connectivity. I look forward to the final plan showing how "Connect SoCal" applies to the free movement of all forms of wildlife throughout southern California.</p>	<p>Thank you for your comment. SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Furthermore, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>

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0001538.02	<p>In the Moreno Valley area it is important to have connectivity—especially for the Fish and Wildlife 20,000 acres San Jacinto Wildlife Area (SJWA). This very special area are in two 10,000 acre units separated by a couple of miles as well as SR-79 and Gilman Springs Road. There are many sensitive, threatened and endangered species using these two SJWA units and they need to travel between them. There are no crossings over or under Gilman Springs Road and SR-79 doesn't have what is necessary for safe crossing of all these special species. As mentioned above the words, Connect SoCal must mean wildlife in addition to people. The plan also needs sufficient money to go back and make right the missing connections/connectivity/linkages for all forms of wildlife from previous already built/approved projects. The Ramona Expressway is on the southern border of the SJWA and will probably use some of these funds and other sales tax money to expand its number of lanes. Again more crossings need to be planed so we do not make the world class SJWA an urban island. The Connect SoCal plans need to provide for the future viability of the SJWA and similar wildlife areas/open space to allow for sufficient linkages. A passenger rail system along the Ramona Expressway could easily happen with Connect SoCal help. SR-60 and the I-215 through Moreno Valley doesn't have any under or over-crossings for wildlife. Will Connect SoCal continue to propose building more and more roadways without fully considering wildlife? The plan needs to build on what other organizations have already produced in showing what linkages must be maintained, but go further for the well being of our planet as well as the enjoyment of future generations. To meet our greenhouse gas (GHG) and air quality as well as Climate Change goals we must reduce vehicle miles traveled. We cannot just rely on electric vehicles, but they are important. Where in this plan is it providing charging stations for both cars and semi-trucks in enough sufficiency to help meet these goals? Where in the plan does it acknowledge induced traffic? Please include the cartoon below this paragraph which depicts what happens in most cases when more asphalt and cement are added to existing lanes = you build it they will come. It is accepted by most state leaders that you cannot build yourself out of congestion with move car/truck lanes.</p>	<p>Thank you for your comment. SCAG recognizes the importance of habitat connectivity to conservation and ensuring a healthy ecosystem. Habitat connectivity areas were included as a growth constraint principle for the Connect SoCal's scenario design, along with areas high in species biodiversity and wetlands. Furthermore, "Improve Natural Corridor Connectivity" is a recommended policy outlined in the Natural & Farm Lands Conservation Technical Report, specifically to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation." In regards to greenhouse gas and climate change goals, Connect SoCal includes a number of strategies to achieve the regional per capita greenhouse gas (GHG) reduction target. Please see GHG Reduction Approach in the Sustainable Communities Strategy Technical Report for more details.</p>

ID	Comment	Response
<p><i>Submitted by</i> Sierra Club Moreno Valley Group Submittal 0001538 Related Documents Link</p>		
0001538.03	<p>The first consideration for additional lanes needs to be for public transportation. At least three times as much money needs to be put into this area as in adding vehicle lanes. If you ever go down the road of providing separate lanes for semi-trucks, then the only trucks that may be allowed to use them must be electric or zero emission. In the area I live, the I-215 and SR-60 interchange or merging of the two freeways is at ultimate design buildout. Even though this is the case we continue to read that there will be efforts to raise the sales tax to widen SR-60 leading to this pinch point and the same is true of the I-215. This area is a beyond challenging most mornings heading west and woe be to all when there is even a minor accident. If and when the 40 million sq foot World Logistic Center (WLC) is built, then its more than 14,000 daily diesel truck trips and its other 50,000 vehicle trips will make Moreno Valley area a nightmare. They/you cannot build enough of anything to make it work and reduce its impacts on GHG and our non-attainment air quality as well as reducing impacts to Climate Change or as some say Climate Disruption. Attached is a newspaper article and two amicus briefs filed January 10, 2020. The first is from the California Attorney General's office and California Air Resources Board expressing concerns over the WLC's impacts. The second is from CEQA and climate experts - Ken Alex, Dallas Burtraw, Ann E. Carlson, Fran Pavley, and Michael Wara. These two "friend of the court" briefs come from those who must implement AB 32 and one of its principal authors as well as the head of Office of Planning and Research (OPR) for many years. All three attachments are to be incorporated into my comments. Projects like the WLC show the importance of rail for both people and goods. SCAG knows the infrastructure is not there for the WLC and will never be available to accommodate its impact. As mentioned above the SR-60 and I-215 point of merging is already built to its ultimate design — what will happen if and when the WLC is built a few miles east of there?</p>	<p>SCAG's vision for truck-only lanes includes expectations that any truck operating on the facilities be clean, meaning zero or near-zero emission vehicles. SCAG understands and shares concerns about congestion, emissions, and other impacts that occur as a result of increased goods movement activities in the region. However, decisions to allow projects such as the World Logistics Center are made at the local jurisdictional level, and SCAG respects local control and does not have the purview over such decisions.</p>
0001538.04	<p>I appreciate this opportunity to make some comments on this plan. As mentioned above please print out the three attachments as part of my comments for future documents as well as the article on Mountain Lions.</p>	<p>Thank you for your comments. Referenced attachments have been noted.</p>
<p><i>Submitted by</i> SoCalGas Submittal 0001517 Related Documents Link</p>		
0001517.01	<p>SoCalGas welcomes the opportunity to comment on the Southern California Association of Government's ("SCAG") Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"). We appreciate the time and effort SCAG staff has spent working with various stakeholders and subject matter experts in developing this plan.</p>	<p>Thank you for your comment. Comment noted.</p>
0001517.02	<p>As a preliminary matter, SoCalGas appreciates SCAG's focus on leveraging both innovative technologies and sustainable growth strategies to help reduce regional greenhouse gas (GHG) emissions, especially from the transportation sector. We agree with and support the goal to combine sustainable land use planning with use of both zero and near-zero emission transportation technologies to achieve significant emissions reductions from transportation, which ultimately contributes not only to local public health benefits, but also benefits global health. To this end, we believe SCAG should take advantage of the best of what innovation can deliver, and welcome technology advancements that move us toward our collective goals.</p>	<p>Thank you for your comments. Comments noted. See the Emerging Technology Technical Report for information on how SCAG researches a wide range of recent and emerging technologies.</p>

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.03	<p>Natural Gas/Renewable Natural Gas Fuel and TechnologySoCalGas greatly appreciates that the Draft RTP/SCS includes a clear, recognized role for near-zero energy technologies like natural gas vehicles in the near term, especially in the goods movement sector. The Draft RTP/SCS currently allocates \$65.7 billion in goods movement strategies, which include “improv[ing] its operations in a way that provides for a healthy environment and livable communities” by “development, deployment, and commercialization of zero and near-zero emission technology” (pg. 7). Supporting the deployment of commercially ready technologies that significantly reduce criteria pollutants and greenhouse gas emissions is critical to meet SCAG’s regional goals. That said, discussion of the benefits from use of natural gas and RNG as transportation fuels is considerably limited. Not only are the air quality benefits from use of low-emission CNG trucks not evaluated, but the report also makes several misstatements regarding the technical capacities of natural gas heavy-duty trucks and their current levels of market penetration. Further, while the Draft RTP/SCS makes an honorable mention of RNG as an alternative fuel source, it does not discuss the magnitude of RNG use and fueling infrastructure or the potential emission reduction benefits from this low carbon transportation fuel.</p>	<p>SCAG has provided a discussion of zero and near zero emission technologies to provide an overview of what is available, under development, or on the way to commercial deployment. This discussion is not intended as a comprehensive evaluation. References to the natural gas engines that are commercially available are discussed and the paragraph has been edited to mention the applications of different engine sizes.</p>
0001517.04	<p>First, to provide clarification on some of the claims made in the Draft RTP/SCS, the report currently briefly mentions that Cummins-Westport’s CWI engines meet the California Air Resources Board’s (CARB) low-NOx engine standards, but ultimately conveys that battery-electric trucks are the only environmentally superior long-term transportation technology. We would like to emphasize that the Cummins-Westport low-NOx ISX 12N engine is the only engine that meets the lowest tier of the CARB Low NOx standard—achieving a 90% reduction in NOx emissions below the current 2010 standards and emitting below 0.02 grams of NOx per brake horsepower (g/bhp). The South Coast Air Quality Management District (SCAQMD) refers to 0.02 g/bhp as power plant equivalent emissions because while electric vehicles (including trucks) may have zero tailpipe emissions, when full life cycle emissions are considered, they are not zero emission. In fact, the near-zero CWI engine actually achieves emissions of 0.01 g/bhp in real world applications, which means a natural gas truck or bus would have lower overall emissions than an equivalent battery electric truck. To provide comparison and clarity to the reader, the Draft RTP/SCS should include this data and, further, provide a CI comparison of currently market ready truck technologies that accounts for full lifecycle impacts—given that the current report expresses the need for technology lifecycle assessment of transportation solutions.</p>	<p>SCAG remains open to all technologies that will help the region to reduce emissions and associated health impacts, and achieve regional air quality goals. As SCAG is technology neutral, a full lifecycle assessment of each technology is beyond the scope of this plan. Similarly, Connect SoCal acknowledges that the terms zero emission and near-zero emissions refer only to tailpipe emissions in the context of this plan.</p>

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.05	<p>The Draft RTP/SCS further claims that natural gas trucks are “weaker when moving heavy loads up steep grades” referencing a feasibility study done by the Port of Los Angeles and the Port of Long Beach. The study, in fact, does not use this language. The study states, “Class 8 NZE natural gas trucks are capable of performing much of the work of diesel drayage trucks. Very heavy loads, combined with steep grades, are likely to remain challenging for current natural gas engines,” (p.109) and continues in the analysis to show that natural gas trucks meet all of the gradeability requirements of a typical port drayage truck. The Draft RTP/SCS also references the Port feasibility study to state that “range is a concern due to limited on board fuel storage” (pg. 124). However, the Port feasibility study states “Natural gas trucks currently offer the only alternative technology that can achieve the daily range requirements and fueling intervals expected by drayage operators.” The limiting factor in a truck’s range, regardless of fuel type, is storage and natural gas trucks have expandable storage options (i.e. larger tanks) that can be installed to meet almost all vocations. Lastly, while the report states that more fueling stations are needed for natural gas trucks to obtain greater market share, current market trends show that natural gas truck sales are actually on an overall upward trajectory, gaining 60% compared to May of 2018. Further, in 2018 SoCalGas provided over 121 million gallons of natural gas to 336 CNG refueling stations, and in 2019 served 122 public access CNG refueling stations—39 of which are heavy-duty accessible. To provide clarity to the reader, the Draft RTP/SCS should include a map of natural gas fueling stations within the state to illustrate fuel availability. A full map of public access natural gas refueling stations in the Southern California can be found at https://www.socalgas.com/for-your-business/natural-gas-vehicles/cng-stations. Within the state, the California Natural Gas Vehicle also maintains a map at https://cngvc.org/why-nvgs/fueling-options/.</p>	Comment noted. Please see changes made in the section called "Cleaner Fuel Trucks"
0001517.06	<p>The Draft RTP/SCS should also include greater focus on development and deployment of RNG as a transportation fuel and should discuss its use as a key strategy to achieving transportation emission reduction goals. Currently, the report gives only brief mention of RNG on page 124 of the Goods Movement Chapter discussing how it is produced and describing UPS’s commitments to increasing the percentage of RNG-fueled vehicles in their fleet. SoCalGas wants to emphasize that RNG has the lowest carbon intensity of any of the carbon pathways under CARB’s Low Carbon Fuel Standard (LCFS) program, and therefore qualifies for greater amounts of LCFS credits. Further, it is the only fuel that can be carbon negative, an important feature not included in the current draft report. AMP Americas, an RNG producer, marketer, and CNG fuel provider for the heavy-duty trucking industry was issued a carbon CI score of -254.94 g CO2e/MJ for its dairy waste-to-vehicle fuel pathway. This is the lowest CI score ever issued by CARB for any fuel or technology. For comparison, heavy-duty vehicles that are fueled or charged via California’s electric grid do not have the same carbon benefits. California grid electricity used as a transportation fuel has a CI of 91.49 g CO2e/MJ whereas diesel has a CI of 100.45 g CO2e/MJ. In the first quarter of 2019, the average RNG CI was 44.26 g CO2e/MJ , providing a 51% decrease in GHG emissions compared to diesel. Inclusion of a graph that illustrates the relative carbon intensities of these fuels, including the carbon negative impact of RNG, in the Draft RTP/SCS would help provide clarity to the reader about the current “cleanness” of all available transportation fuels.</p>	Comment noted. RNG and all fuels are mentioned to provide an overview of potential technologies and fuels. As no recommendations are made related to specific technologies, it is not appropriate to add this level of detail to the plan.

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.07	<p>In addition, RNG is rapidly gaining market share as a transportation fuel. Based on data from the CARB Low Carbon Fuel Standard (LCFS) Program, over 78% of the fuel used at CNG stations is RNG. At public fueling stations, most major RNG suppliers, including SoCalGas, have committed to providing 100% RNG at public stations. For example, Clean Energy Fuels is a fueling infrastructure company currently offering RNG fueling at a majority of its California stations through the “Redeem” program. LA Metro is using RNG to fuel low-NOx heavy duty truck engines to meet its carbon reduction requirements to achieve carbon neutrality. Further, some companies are using their own operations to produce RNG fuel and use it onsite. Waste collector CR&R recently built a waste processing facility in Perris, CA that uses an anaerobic digester to collect methane emissions from waste and uses it as renewable natural gas to fuel their 900-vehicle truck fleet.</p>	<p>Thank you for your comments. For the purpose of providing an overview of cleaner fuels for trucks, renewable natural gas was discussed in the section called "Cleaner Fuel Trucks."</p>
0001517.08	<p>Lastly, as stated in our prior comment letters, renewable natural gas creates jobs. The Renewable Natural Gas Coalition estimates that biomethane projects in California have resulted in the creation of more jobs per year average (11.5) than any other renewable energy technology. According to Renewable Natural Gas Coalition’s California Biofuels Cap and Trade Initiative, developing biomethane projects at 200 candidate sites throughout the state (located at landfills, waste water recovery facilities, and agricultural sites) would create more than 20,000 direct and indirect jobs in 42 California counties.</p>	<p>Comment noted. Where possible, SCAG makes a connection between investment in new technologies and alternative fuels and energy sources and the potential to grow "green economies."</p>
0001517.09	<p>With this, the Draft RTP/SCS should include greater focus on RNG as both a near-term and long-term alternative transportation fuel. Not only can RNG achieve a substantially lower CI score than battery-electric vehicles, but they also are outperforming battery-electric truck technologies in terms of operational capabilities (i.e. range, fueling times, fuel storage), cost, and market penetration. These factors warrant greater, more detailed discussion of near-zero natural gas trucks as near-term alternative transportation technologies, as well as use of RNG for transportation fueling as a long-term transportation solution.</p>	<p>Thank you for your comment. The Goods Movement Technical Report discusses examples of potential near- and long-term options for further study that have the potential to reduce emissions and help the region meet attainment deadlines. This includes renewable natural gas among other alternative fuel sources.</p>
0001517.10	<p>Hydrogen Fuel Cell TechnologySoCalGas also appreciates that the Draft RTP/SCS highlights the important role of hydrogen fuel cell technology both in the near- and long-term in the goods movement sector. Like RNG, hydrogen technologies have a key role to play in helping meet both air quality and climate change policy goals for California. However, like the current discussion of RNG discussed above, the Draft RTP/SCS gives short analysis of hydrogen fuel cells as a zero-emission transportation technology and the potential environmental benefits that can be achieved from its proliferation in the goods movement sector. Hydrogen, because of its fast fuel time and high pressure storage, provides a long-range zero emission solution for heavy-duty trucking that cannot currently be matched by battery-electric trucks. This is particularly important for the region because long range trucking makes up a significant portion of emissions in the region and battery-electric trucks will not be able to serve these applications unless there is a significant technological breakthrough on range. The report provides little information on the emission reductions possible from hydrogen fuel and overlooks how hydrogen helps support integration of electric power sources. In addition, SoCalGas would like to provide clarification on several statements within the report regarding the state of the technology in comparison to battery-electric trucks, fuel cell lifecycle efficiency, and infrastructure costs.</p>	<p>SCAG remains open to all technologies that will help the region to reduce emissions, associated health impacts and to help the region achieve regional air quality goals. As we remain technology neutral, a full lifecycle assessment of each technology is beyond the scope of this plan.</p>

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.11	<p>To start, the Draft RTP/SCS states that electric batteries for heavy duty trucks are more efficient than fuel cells from a “well-to-wheels” perspective given the method of hydrogen production and the energy demand to produce and dispense it. Further, it classifies hydrogen fuel cell vehicles as near-zero emission vehicles (pg. 125, 126). Here, these statements inaccurately conflate referencing hydrogen fuel cells as a technology and use of hydrogen as a fuel. Like batteries, fuel cell-operated vehicles are also electric. A hydrogen fuel cell uses the chemical energy of hydrogen to cleanly and efficiently produce electricity, with water and heat being simultaneous products. Both battery electric and fuel cell electric vehicles do not produce emissions at the tailpipe and therefore are considered zero-emission technologies, and can help support both regional air quality goals as well as the State’s climate change goals. That said, it is true that the method in which the hydrogen is produced may not be zero-emission from a lifecycle perspective. If the hydrogen is produced from fossil natural gas, carbon emissions are produced, but if the hydrogen is produced from carbon neutral or negative renewable natural gas, no carbon emissions are produced. Like electricity, hydrogen can also be produced from multiple renewable energy resources from multiple production pathways, including wind and solar through electrolysis or through biomass/biomethane reformation. Therefore, if the Draft RTP/SCS includes discussion of lifecycle emissions of hydrogen as a fuel and fuel cells as a transportation technology, it should include similar discussion of the lifecycle emissions of electricity as an energy resource and batteries as a transportation technology. From a fuel perspective, neither electricity nor hydrogen is 100% renewable today. Because the State grid mix is not 100% renewable, the electricity to power a battery-electric truck would be generated by non-renewable resources, and therefore would have associated lifecycle emissions. Here, using the reasoning on page 126, battery-electric trucks should also be considered as near-zero emission vehicles. With this, SoCalGas suggests revising the discussion on pages 125 and 126 of the Goods Movement chapter to better distinguish between the environmental impacts of transportation fuels and transportation technologies so that the comparison between hydrogen fuel cell trucks and battery-electric trucks is better clarified.</p>	<p>In the section, Fuel Cell trucks, the vehicle that is powered by the fuel cell is considered to be a zero tailpipe emission vehicle. As noted under the section titled Related Regulatory Initiatives, "It is important to note that the term ‘zero emission’ as used throughout this document refers to technologies that are zero tailpipe emissions, meaning emissions are not released at the location of the vehicle, but may still be produced off-site through the production of energy needed to power the vehicle." Therefore, SCAG acknowledges that from a life cycle perspective, vehicles described as zero emissions might not be considered zero-emissions. A full lifecycle analysis comparing technologies is beyond the scope of this plan. To avoid misleading the reader, the reference to “wells-to-wheels” perspective was removed.</p>

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.12	<p>To start, the Draft RTP/SCS states that electric batteries for heavy duty trucks are more efficient than fuel cells from a “well-to-wheels” perspective given the method of hydrogen production and the energy demand to produce and dispense it. Further, it classifies hydrogen fuel cell vehicles as near-zero emission vehicles (pg. 125, 126). Here, these statements inaccurately conflate referencing hydrogen fuel cells as a technology and use of hydrogen as a fuel. Like batteries, fuel cell-operated vehicles are also electric. A hydrogen fuel cell uses the chemical energy of hydrogen to cleanly and efficiently produce electricity, with water and heat being simultaneous products. Both battery electric and fuel cell electric vehicles do not produce emissions at the tailpipe and therefore are considered zero-emission technologies, and can help support both regional air quality goals as well as the State’s climate change goals. That said, it is true that the method in which the hydrogen is produced may not be zero-emission from a lifecycle perspective. If the hydrogen is produced from fossil natural gas, carbon emissions are produced, but if the hydrogen is produced from carbon neutral or negative renewable natural gas, no carbon emissions are produced. Like electricity, hydrogen can also be produced from multiple renewable energy resources from multiple production pathways, including wind and solar through electrolysis or through biomass/biomethane reformation. Therefore, if the Draft RTP/SCS includes discussion of lifecycle emissions of hydrogen as a fuel and fuel cells as a transportation technology, it should include similar discussion of the lifecycle emissions of electricity as an energy resource and batteries as a transportation technology. From a fuel perspective, neither electricity nor hydrogen is 100% renewable today. Because the State grid mix is not 100% renewable, the electricity to power a battery-electric truck would be generated by non-renewable resources, and therefore would have associated lifecycle emissions. Here, using the reasoning on page 126, battery-electric trucks should also be considered as near-zero emission vehicles. With this, SoCalGas suggests revising the discussion on pages 125 and 126 of the Goods Movement chapter to better distinguish between the environmental impacts of transportation fuels and transportation technologies so that the comparison between hydrogen fuel cell trucks and battery-electric trucks is better clarified.</p>	<p>In the section, Fuel Cell trucks, the vehicle that is powered by the fuel cell is considered to be a zero tailpipe emission vehicle. As noted under the section titled Related Regulatory Initiatives, "It is important to note that the term ‘zero emission’ as used throughout this document refers to technologies that are zero tailpipe emissions, meaning emissions are not released at the location of the vehicle, but may still be produced off-site through the production of energy needed to power the vehicle." Therefore, SCAG acknowledges that from a life cycle perspective, vehicles described as zero emissions might not be considered zero-emissions. A full lifecycle analysis comparing technologies is beyond the scope of this plan. To avoid misleading the reader, the reference to “wells-to-wheels” perspective was removed.</p>

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.13	<p>The Draft RTP/SCS also states that hydrogen fuel cells require a unique, more complicated refueling infrastructure and would add infrastructure costs due to hydrogen fueling and charging equipment (pg. 125, 126). Further, it states that fuel cell trucks are at a lower “Technology Readiness level” than battery electric trucks. Again, both statements require clarification. First, they overlook the reality that battery electric Class 7 and 8 trucks have significant operating limitations, including but not limited to range, cost, charging time, and infrastructure availability. In comparison, fuel cell trucks do not face range or fueling time issues and are also currently in use. Therefore, although battery electric trucks may be farther along in deployment, they are not at the level of market-readiness needed for wider penetration of goods movement operations. Further, the costs of fuel and fueling infrastructure to truck operators should be distinguished. For hydrogen fuel cell trucks, the truck operator only pays for the hydrogen fuel, whereas the jurisdiction would incur costs for the infrastructure. Further, no charging equipment is needed for hydrogen fuel cells, as hydrogen is the fuel used to generate electricity. However, for battery-electric trucks, truck operators cover the costs for both the electricity as well as the charging infrastructure, yet this is not discussed in this section of the report. If the Draft RTP/SCS discusses costs associated with hydrogen infrastructure, it should also include discussion of costs associated with charging infrastructure.</p>	<p>The plan acknowledges that neither technology is yet ready for full scale commercial deployment and SCAG supports programs to further develop and deploy zero emission technologies. SCAG has provided minimal cost information in this report to provide a high level overview of these technologies, and a full cost analysis is beyond the scope of this plan. The statement about a complicated system has been modified.</p>
0001517.14	<p>However, most prominently, the Draft RTP/SCS overlooks the critical role hydrogen fuel cells have to play in reducing transportation emissions from goods movement operations. As we know, transportation counts for 41% of the state’s total emissions. Further, State goods movement operations account for 52% of NOx emissions and 10.7% of PM2.5 emissions in the South Coast Air Basin, with trucks responsible for most of the emissions. As stated previously, because hydrogen is an energy carrier like electricity, it can be produced from numerous resources including biomass, wind, and solar energy (e.g. Power-to-gas, electrolysis)—where emissions are avoided at the point of fuel production. As discussed above, when used to power a fuel cell, emissions are also avoided at the point of power generation, thereby making hydrogen truly zero-emission from a lifecycle perspective. Further, although, fuel cell electric vehicles and battery-electric vehicles are the only zero-emissions vehicle solutions for heavy-duty and material-handling vehicles, only fuel cell vehicles have fueling times similar to conventional gasoline or diesel vehicles, and with larger onboard energy storage capacity than battery-electric vehicles. Therefore, they are a natural complementary zero-emission technology for the transport sector to transition to zero carbon and a competitive mobility solution for customers who want to retain the ability to refuel quickly and drive for longer distances carrying heavier loads. Fuel cells are also scalable in being able to power multiple vehicle sizes from heavy-duty trucks to buses, ships, and planes. These factors give hydrogen fuel cells great potential to help drastically reduce emissions from goods movement operations. Further, hydrogen as a transportation fuel can better enable integration of low-carbon electric power sources. Grid-connected electrolyzers that produce hydrogen could provide a significant source of flexibility for intermittent renewables, thereby providing long-duration storage solutions that are complementary to short-duration battery solutions.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.15	<p>Many automakers are quickly recognizing the need develop their own fuel cell platform and are forming collaborations with other automakers to reduce development time and cost to bring these vehicles to market as quickly as possible, for both heavy and light duty vehicles. As part of CARB’s awarded \$41 million grant to the Port of Los Angeles for the Zero-and-Near-Zero Emission Freight Facilities Project (ZANZEFF), Toyota has teamed up with the Port of Los Angeles on a shore-to-shore fuel cell truck project aimed to demonstrate zero- and low-emission goods movement operations between the ports at the coast and distribution centers in the Inland Empire. The project features a tri-gen fuel production process at the ports that fuels hydrogen fuel cell trucks before they travel inland, along with a second fueling station at the distribution centers. The project demonstrates the great potential of hydrogen fuel cell technology to contribute to emission reductions from intra- and interstate goods movement operations. Further, Anheuser-Busch has contracted with hydrogen-powered semi-truck startup Nikola Motor Company to purchase 800 zero-emission hydrogen fuel cell big rigs for their truck fleet. To support this and future orders, Nikola has committed to building over 700 hydrogen stations in the US and Canada by 2028. This project confirms that hydrogen fuel cell technology is not just a California-centric trend, but rather a nationwide goods movement trend, with significant promise to achieve widespread emissions reductions from the goods movement sector.</p>	<p>Comment noted. An overview of the ZANZEFF grant is discussed under Phase 3: Initial Deployment and Operational Demonstration.</p>
0001517.16	<p>Given the evident environmental benefits and economic effectiveness of hydrogen fuel cell applications in the goods movement sector, the Draft RTP/SCS should include greater illustration and discussion of the scope of hydrogen fueling technology and infrastructure, first by adding hydrogen fuel cell companies to the emerging technologies map in Exhibit 1 of the Emerging Technologies chapter and then revising the discussion in the Emerging Technologies and Goods Movement chapters to include the comments stated above.</p>	<p>Thank you for your comment. While hydrogen fuel cell applications are still emerging in the sense of adoption, they are not an emerging technology in the way that CAVs or electric scooters are - that is we more or less know how this technology can manifest itself in our region.</p>
0001517.17	<p>Going forward, hydrogen will continue to play an increasing role in zero and near-zero transportation technologies that will help address goods movement operations that are difficult to decarbonize, and therefore contribute to higher proportions of zero-emission vehicles on the road. As we discuss below, promoting a wide range of diverse clean energy technology pathways is critical to ensuring attainment of California’s environmental goals.</p>	<p>SCAG remains fuel and technology neutral and supports development of technologies that meet the regions zero emission and near zero emission objectives.</p>

ID	Comment	Response
<i>Submitted by</i>	SoCalGas	Submittal 0001517 Related Documents Link
0001517.18	<p>Diverse Pathways Help Ensure Plan Resilience and SuccessThe natural gas system has proven to positively contribute to achievement of California’s aggressive environmental goals as well as to local economic health. Through close collaboration with our customers and technology developers, SoCalGas is committed to continually identifying and advancing clean energy technology solutions through our energy efficiency programs, customer education and outreach initiatives, and by supporting both near- and long-term technology solutions that effectively reduce local air quality pollutants while evolving to meet our customers’ changing energy needs. Further, as discussed in the Draft RTP/SCS, SoCalGas has committed to decarbonizing our system by injecting carbon neutral/negative renewable natural gas (RNG) into our system to replace traditional fossil gas, with the goals of having five percent RNG by 2022, and 20% by 2030.Diversity of technology and strategies for transportation and emission reductions will be critical to achieve the goals of the Draft RTP/SCS, especially given the current rapid pace of technological innovation that can positively or negatively affect attainment of regional transportation and environmental goals. Even during just the past decade, Southern California experienced a new wave of transportation technology platforms that SCAG could not have predicted. For example, the 2012 RTP/SCS did not anticipate the quick-proliferation of transportation network companies like Uber and Lyft, which have increased regional vehicle miles traveled (VMT), contrary to SCAG’s strategies and goals to decrease VMT. Further, the 2016 RTP/SCS did not foresee the speedy growth of micro-mobility services like shared scooters and bicycles (e.g. Bird, Lime, Metro Bike Share, etc.) that proved to be effective zero-emission active transportation solutions for reducing vehicle use for short-distance, local trips. These examples demonstrate the difficulty of predicting future transportation conditions and technologies, especially given the diversity of transportation needs across the Southern California region. Therefore, active inclusion of a multitude of diverse pathways for transportation technologies and alternative energy sources into regional transportation strategies provides the best chance to ensure attainment of goals within the Draft RTP/SCS, despite future uncertainties.</p>	<p>Thank you for your comment. While we strive to be on the cutting edge of transportation technology advances, we are also constrained by the data and information available at this point in time. Therefore Connect SoCal leaves room for currently-unknown technologies to fit into the guidance frameworks that are included throughout the document.</p>
0001517.19	<p>Further, as expressed in our comments on the previous 2016 RTP/SCS, diversity of the state’s energy portfolio is also important for supporting resiliency of energy infrastructure as a climate adaptation strategy and should be a key consideration in the overall analysis of future technology pathways. As we’ve seen from recent extreme droughts, wildfires, hurricanes, and El Nino events over the past decade, increasing weather extremes can exploit the vulnerability of local energy systems to damage from climate impacts—and overreliance on only one energy source can significantly escalate this risk. For example, during the recent wildfires and mudslides, as the electric system is almost entirely aboveground, it proved to be significantly more exposed to climate threats and, when impacted, can not only leave hundreds to thousands of residents without power at their homes, but also affect operation of critical facilities. In 2017 the Thomas Fire damaged electric power lines throughout the City of Ventura. Because the City’s water pumps to supply water to firefighters ran on electricity without any other form of backup power, firefighters were unable to get water from the pumps to put out burning residences. If all vehicles within the City had been only electric-powered, thousands of residents would have been left stranded without a way to evacuate.</p>	<p>Thank you for your comment. The Emerging Technology Technical Report will be updated to note that alternative fuel vehicles can operate during certain emergencies when electric vehicles can't.</p>

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<i>Submitted by</i> SoCalGas Submittal 0001517 Related Documents Link		
0001517.20	<p>In contrast, there are inherent climate adaptation and local resilience benefits through use of gas infrastructure. As the natural gas system is mostly underground, it is inherently resilient to extreme weather events. For example, in 2012, after Superstorm Sandy, the entire natural gas system in the Northeast was essentially intact, allowing residents to support back-up generators, cook, and keep warm. Businesses with natural gas-powered fuel cells were able to operate and compressed natural gas (CNG) buses in New Jersey were used to shuttle residents to safety. Further, when Hurricane Harvey temporarily disabled almost 30% of the nation’s refining capacity, CNG shuttles were able to continue operating, and hospitals that had on-site combined heat and power systems were able to provide urgently needed medical attention, despite flooding. These examples demonstrate the critical role natural gas infrastructure can play in supporting local and regional energy supply resilience in the face of extreme climate events and use of renewable natural gas can achieve additional co-benefits in reducing GHG emissions. With these case studies, SoCalGas wants to emphasize the importance of energy supply diversification as a climate change adaptation strategy, especially in regard to the regional transportation system, as maintaining and promoting a variety of low- and no-carbon energy sources across the economy is a prudent measure to ensure resiliency without compromising environmental goals.</p>	<p>Thank you for your comment. The Connect SoCal does make mention of many types of alternative fuels and alternative fuel vehicles, and we look forward to working with you to keep our awareness and knowledge of these fuels current.</p>
<i>Submitted by</i> SoCalGas Submittal 0001518 Related Documents Link		
0001518.01	<p>We applaud SCAG’s effort in creating a technology neutral, performance-based RTP/SCS that looks to take advantage of the best that technology can offer. SoCalGas looks forward to working with SCAG and membership communities over the coming years to develop clear and actionable strategies to take advantage of and invest in opportunities to utilize renewable natural gas’ and hydrogen’s potential as clean energy solutions. Decisions today are defining the course of our clean energy future in all sectors of our economy. Simply put, Southern California has the unique challenges and opportunities presented by its comprehensive environmental targets that cannot be met by staying on the current course. There will always be ongoing regulatory initiatives that are being undertaken by various agencies in the state, but this should not deter SCAG from taking the lead in affirming natural gas’, RNG’s, and hydrogen’s roles in the long-term energy mix as clean and affordable ways to reduce smog and greenhouse gas emissions and improve the health of all Californians.</p>	<p>Thank you for your comments. Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> SoCalGas		Submittal 0001518 Related Documents Link
0001518.02	SoCalGas supports expanded research, development and deployment agendas for natural gas, renewable natural gas and hydrogen technologies—we believe the next step will be to prioritize these research opportunities and identify specific action plans to advance strategies for realizing the benefits of all as transportation fuels. We appreciate the opportunity to provide comments and input on the 2020 Regional Transportation Plan/Sustainable Communities Strategy. Southern California is our home and we share SCAG’s goals to strive at the highest levels to preserve and take care of it. We embrace a big picture view and shall continue to work diligently to provide safe, clean, reliable and affordable service to 21 million people. We believe natural gas, RNG, and hydrogen offer affordable, clean and practical ways to meet California’s goals and look forward to continuing to work together to develop action plans to align state and regional policies and identify funding resources to advance cleaner fuel technologies to meet the state’s environmental goals, improve the health of our local communities through NOx, particulate matter and ozone emissions reductions, as well as global health through GHG reductions.	Comment noted.
<i>Submitted by</i> South Bay Cities Council of Governments		Submittal 0001410 Related Documents Link
0001410.01	The Plan refers to TNC fees in several locations. The SBCCOG strongly believes that TNC fees should be collected at the local level. They are analogous to taxi franchise fees which are collected locally and the burden identified on the infrastructure is primarily local. Regional entities should not be levying those fees and making it difficult for local governments to use this revenue source.	Comment noted.
0001410.02	Shared use of sidewalks for bicyclists, scooters and pedestrians is discussed. The SBCCOG is concerned about the safety ramifications and municipal liability this strategy would engender.	The text in the Final Connect SoCal states that SCAG will analyze the shared use of sidewalk between different modes. As this analysis is not yet complete, SCAG does not make any recommendations to this point. Safety for all users will be considered in the analysis. Additionally, local jurisdictions have the authority to determine use of the sidewalk.
0001410.03	Express Lane net tolls are to be used in the corridor from which they are collected by State Law.	Comment noted. SCAG recognizes that net toll revenues are to be used in the corridor from which they are collected.
0001410.04	Improvements on freeways including additions of Express Lanes should include corridor integration management with the arterials and local transit as referenced in the I-210 pilot.	Comment noted.
0001410.05	TOD strategies are endorsed but there is no documentation as to how they are actually working to reduce VMT. Some research indicates that while residents of TOD buildings use transit, they do not reduce their driving. Net transit growth or single-occupant VMT reductions should be calculated for TOD strategies. In addition, growth in hot-spot congestion and air quality hot spot impacts should be calculated for TODs.	Comment noted. There have been numerous studies published regarding the link between transit oriented development (TOD) and reductions in vehicle miles travelled (VMT). Recent research suggests that for some developments the related VMT reductions are due to the overall location density and reduced trip lengths more so than mode shift to using transit. The calculations requested for TOD hot spots is outside the scope of this plan.
0001410.06	Page 38 – Acknowledges that a growing number of adults are choosing to age in place and want to remain in their community. However, it also states that we need to plan for a walkable, compact environment to avoid unsustainable urban sprawl. While true, densifying the community is why we are seeing NIMBYs who prefer the community that they know without the traffic and parking impacts attendant to densification.	Comment noted.

ID	Comment	Response
<i>Submitted by</i>	South Bay Cities Council of Governments	Submittal 0001410 Related Documents Link
0001410.07	Page 49 – Acknowledges promoting neighborhood electric vehicles and access to services through technology such as telework, telemedicine and other incentives to reduce single-occupant vehicle miles travelled.	Comment noted. The text has been addressed in the Final Connect SoCal.
0001410.08.1	Page 51 – Transit Priority Areas (TPAs) are defined as intersections of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. While the Plan discusses safe and convenient transportation alternatives, it appears that TPAs are justified solely by the frequency of service without a priority placed on personal safety and security and other perceptions that are keeping people from riding transit.	SCAG worked closely with local cities and transit agencies to identify existing and future Transit Priority Areas (TPAs). TPAs are defined by California Public Resources Code Section 21099(a), which does not provide for addressing perceptions of safety, security or other negative perceptions affecting transit ridership.
0001410.08.2	Also, the performance measures and results of the plan project that in 2045, the transit mode share will be 12.5% of work trips and 7.7% of all trips if we adopt the policies and programs in the plan. The table which shows the county breakdown is missing so it is not clear how much, if at all, TODs will contribute to congestion reduction.	The table presenting comparative county-level transit mode share performance is provided in ‘Table 5.2: Transit Mode Share 2045’ in the ‘Measuring Our Progress’ chapter of the Final Connect SoCal.
0001410.09	Page 51 – Neighborhood Mobility Areas (NMAs) encourage walkability, active transportation and short, shared vehicular trips. If someone is taking a short trip, why would they necessarily want to wait to share a ride?	Comment noted. The reference to short, shared vehicular trips includes members of the same household riding together to a destination and is not exclusive to shared rides from Transportation Network Companies (TNCs) such as Lyft and Uber.
0001410.10	Page 52 – Acknowledges the South Bay Fiber Network project as a Promising Practice.	Yes, the South Bay Fiber Network is identified in Chapter 3 of the Final Connect SoCal.
0001410.11	Page 60 – Discusses the potential application of cordon/area pricing and says that the revenues would go directly toward transportation improvements, pedestrian amenities and economic development. Would those revenues stay in the area from which they are generated or be available throughout the whole county, SCAG region, or Air Quality Management District? Metro wants to dedicate its net revenues for transit improvements and SCAQMD wants to use revenues to solely to improve air quality. And, how would it be enforced since from our own experience, we know Metro is not using the net Express Lane revenues within the I-10 and I-110 corridors that we are entitled to under State law?	SCAG supports local return to source and recognizes the critical role of local jurisdiction(s) from which revenues would be generated with the application of cordon/area pricing.
0001410.12	Page 61 – Commends the I-210 Pilot which integrates management and operation of the freeway with nearby arterials and local transit. Shouldn’t this be a strategy for other freeways? We know that parallel arterial improvements are not included in Express Lane projects that LA Metro is pursuing on the I-105 and I-405.	Comment noted. Building on the success of I-210 ICM Pilot, Caltrans does have plans to expand the application of ICM concepts to other highway corridors throughout Southern California pending funding availability.
0001410.13	Page 73 – Discusses analyzing shared use of sidewalks for bicyclists, scooters and pedestrians. Do we want to consider vehicles for the sidewalks considering the safety ramifications and municipal liability this strategy would engender?	The text in the Final Connect SoCal states that SCAG will analyze the shared use of sidewalk between different modes. As this analysis is not yet complete, SCAG does not make any recommendations to this point. Safety for all users will be considered in the analysis. Additionally, local jurisdictions have the authority to determine use of the sidewalk.
0001410.14	Page 74 – Regional Express Lane Network discussed building on the success of the I-10 and I-110 Express Lanes in Los Angeles County. How is “success” defined? What are the mobility and sustainability metrics?	This refers to successful implementation. The Final Connect SoCal will be updated to reflect this.

ID	Comment	Response
<p><i>Submitted by</i> South Bay Cities Council of Governments Submittal 0001410 Related Documents Link</p>		
0001410.15.1	Page 77 – typos and timeline issues. 3rd one on the chart should be I-105 and we understand it to be LA County’s first priority so why would it be completed in 2029? Has Metro changed the sequencing?	Comment noted. LA Metro requested revisions to the project including updating the completion year during the public comment period. The completion year as provided by Metro for this project is now 2027. Please contact LA Metro for future updates on the project.
0001410.15.2	Also, can the Sepulveda Corridor Express Lanes be completed by 2026?	The project completion year was revised from 2026 to 2027 by LA Metro during the public comment period. This edit will be reflected in the Final Connect SoCal.
0001410.16	Page 96 – typos – the Figures are numbered differently in the text than they are on the charts and the numbers don’t match the text on Figure 4.1	As stated in the text, Figure 4.1 refers to the breakdown of both core and reasonably available sources. For core sources the Plan is funded 61 percent by local sources, 31 percent by state sources and eight percent by federal sources.
0001410.17	Page 97 – states that it assumes mitigation measures such as the establishment of a mobility equity fund to provide resources that can increase access for environmental justice communities. Would this be county by county or regionwide? Additionally, “Environmental Justice Communities” need much more definition.	Equity impacts differ significantly across different pricing programs, and any mitigation would be tailored to reduce equity impacts specific to the program. Please see the Transportation Finance Technical Report for a detailed discussion of funding sources. Environmental Justice communities are defined and discussed in the Environmental Justice Technical Report.
0001410.18	How do these anticipated costs pencil out to create more funds and make the Plan achievable? Page 96 – 22% new revenue needed to implement the programs and policies in the PlanPage 97 – Construction cost increases will be projected at a 4.5% annual inflation factor increase.Page 99 – Retail Sales tax growth is from 1.1% to 3.7% (Page 96 – core sources - 61% local)Page 100 – Transit O & M costs grew 5% with the regional average being 3.3%In light of the foregoing stats, how does SCAG project a balanced budget or what are its prioritized strategies if additional revenue is not forthcoming?	In accordance with applicable state and federal requirements, Connect SoCal includes a financial plan that estimates how much funding will be needed to implement transportation investment needs, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan must demonstrate that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonably expected to be available for transportation investments.Table 4 in the Transportation Finance Technical Report details revenue source availability, risk assessment and mitigation.
0001410.19	Page 101 – Reasonably available new revenues include a per-mile charge of ca. \$.05 (2019 dollars) for Transportation Network Companies (ex. Uber and Lyft). While cities are losing their franchise revenues from taxi companies, the region wants to take this funding source away from cities. We have objected to this at Metro and should comment here.	Comment noted. SCAG envisioned that such fees would be locally administered.
0001410.20	Page 102 – colors on the chart are so similar it’s impossible to understand.	Proposed revisions will be considered in the Final Connect SoCal.
<p><i>Submitted by</i> South Bay Cities Council of Governments Submittal 0001411 Related Documents Link</p>		
0001411.01	Page 106 – relies on Congress for significant amount of funds – almost \$50 billion over the period of the Plan – to 2045. Is this a realistic assumption based on historical investment trends?	Details on all revenue sources included in the financial plan can be found in the Transportation Finance Technical Report. SCAG recognizes the challenges associated with existing fuel tax based sources of funds, particularly given historical trends. Our analyses indicates that new sources of funding, namely a transition to a mileage based user fee system would need to be realized in the long term.
0001411.02.1	Page 108 – Relies on \$27.3 billion in farebox revenues – most from Metro and Metro is possibly considering free fares.	Currently, Metro's policy is to collect farebox revenue. However, SCAG will continue to work with local partners such as Metro to monitor any changes such as free fares and incorporate into the Plan as appropriate.

ID	Comment	Response
<p><i>Submitted by</i> South Bay Cities Council of Governments Submittal 0001411 Related Documents Link</p>		
0001411.02.2	Also, what level of transit service would \$23.7 billion in fare revenue support?	\$23.7 billion in fare revenue could support a robust level of service; however, all public transit service in the SCAG region, and nationally, requires significant public fund subsidies to operate, which are highly scarce and sometimes only obtained through a competitive process.
0001411.02.3	Is there a target for how much the farebox should be providing in revenues for the service delivered?	The Final Connect SoCal does not have an overall or regional farebox recovery target, but relies on the farebox recovery targets as set by individual transit agencies in the SCAG region.
0001411.03	Page 108 – Highway Tolls are described as including revenues generated from I-10 and I-110 Express Lanes. It appears that the net proceeds are not expected to come back to the corridors which is a violation of current state law.	SCAG assumes that any net revenues generated from express lanes are returned to the corridors from which they are generated.
0001411.04	Page 111 – Value Capture Strategies are defined as EIFDs and tax increment financing for transit supportive housing related infrastructure such as improved water and sewer infrastructure in Transit Priority Areas. How does this create transportation dollars?	Projected EIFD revenues are offset by estimated transit supportive housing related infrastructure costs reflected in the Final Connect SoCal.
0001411.05	Page 122 – Performance Results of the Plan appear to be rather slight benefits for all of these funds expended – in Los Angeles County, less than 2 minutes per capita improvement in daily delay and 3 miles less in daily VMT per capita.	In response to your observations regarding the performance results obtained through investments, while the results may appear small on a per capita basis, when attributed to the entire population of the SCAG region, now exceeding 19 million residents, these improvements are very significant and represent meaningful progress toward meeting our regional sustainability and GHG emission reduction goals. With a continuously growing population, the containment of VMT growth and concomitant increase in GHG emissions from motor vehicles has presented a major challenge for the SCAG region. This regional effort to curtail growth in the length and duration of motor vehicle trips has been a primary focus of Connect SoCal. While the initial results of this effort may not yet be pronounced, our trajectory for the future is now set toward a decline in per capita VMT and in daily travel delay, ultimately resulting in reduced GHG emissions and a more sustainable future for the SCAG region.
0001411.06	Page 127 & 133 – missing information. The numbering of the tables goes from Table 1 to Table 5.7. Where are the missing tables – 5.2 through 5.6? The text states that Table 5.2 shows transit mode share by county which would be important to see.	The numerical sequencing of the tables presented in the ‘Measuring Our Progress’ chapter of the Final Connect SoCal have been updated.
<p><i>Submitted by</i> South Bay Cities Council of Governments Submittal 0001412 Related Documents Link</p>		
0001412.01	At the SBCCOG’s November Board of Directors meeting, a Redondo Beach resident made the following public comment that we wish to relay on her behalf: Holly Osborne, a Redondo Beach resident and retired engineer, addressed the Board to make them aware of data errors in SCAG’s RHNA calculations and to request assistance where possible to get in contact with SCAG to remedy the error. Ms. Osborne explained that SCAG calculated RHNA figures using two Metro stops that no longer exist (190th/Hawthorne and Inglewood/Manhattan Beach Blvd). She also noted that parks are exempt from calculations and suggested cemeteries be treated similarly.	We have updated our 2045 transit map to include the removal of these two Metro stops, consistent with direction from Metro. This will be included in the final Connect SoCal, and also reflected in the updated draft RHNA calculations. Please note that for RHNA purposes, high-quality transit areas (HQTAs) are assessed based on the population living within them, thus both parks and cemeteries within HQTAs would not generate any RHNA allocation.

ID	Comment	Response
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001483 Related Documents Link
0001483.01	Thank you for the opportunity to comment on SCAG's Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal Plan) and the Draft Program Environmental Impact Report (PEIR). Attached are comments from the South Coast AQMD staff on the Connect SoCal Plan (Attachment 1) and the Draft PEIR for the Connect SoCal Plan (Attachment 2).	Thank you for your comments.
0001483.02	The 2023 attainment date for the 1997 federal 8-hour ozone standard represents a significant challenge to the South Coast Air Basin (Basin). This attainment challenge (including potential sanctions on highway funding) should be highlighted in the Plan as a regional priority. Withgoods movement accounting for a significant portion of the mobile source emissions in the Basin, there is a critical need for a new and innovative regional goods movement system that needs to be pursued and developed through a collaborative process. More detailed comments on goods movement are included in Attachment 1.	SCAG agrees about the importance of the attainment challenge as reflected in Connect SoCal.
0001483.03	After a review of the Draft PEIR's air quality and health risk analyses and supporting technical documents, the Draft PEIR likely under-estimated the air quality impacts of the Plan. The Draft PEIR improperly credits the Plan with emission reductions in air quality and health risks that will occur independent of the Plan due to adopted state and federal rules and regulations. Second, SCAG did not utilize South Coast AQMD's CEQA significance threshold of for health risk impacts. More detailed comments on the Draft PEIR are included in Attachment 2.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001483.04	We are fully committed to continuing to work collaboratively with SCAG and other stakeholders to achieve the vision outlined in this Plan.	SCAG shares in the commitment to continue our collaboration.
0001483.05	Attachment 1 - Comments on SCAG's Draft 2020-2045 Regional Transportation Plan /Sustainable Communities Strategy (Connect SoCal Plan). Attainment of federal air quality standards, a regional priority - The South Coast Air Basin (Basin) is facing a daunting challenge to meet the upcoming deadlines for attaining the healthbased federal ozone standards. NOx is the key pollutant causing high ozone levels in our region and must be reduced by 45% and 55% beyond all existing regulations by 2023 and 2031, respectively, to meet federal standards and achieve healthy air for the region. Because over 80% of the NOx in our region is from mobile sources, significant reductions have to come from goods movement sectors (i.e., trucks, cargo handling equipment, rail and ocean-going vessels). Aggressive regulations, advancements in technologies, innovative solutions and integrated land use and transportation planning as well as coordinated efforts among all stakeholders, at local, state and federal levels are essential to achieve the needed reductions from goods movement activities. We strongly recommend that the challenge of attaining the federal air quality standards be presented in the Connect SoCal Plan as a regional priority calling for a regional solution.	A description will be added reflecting the new challenge, its potential implications, and the need for a comprehensive and coordinated regional solution in the Final Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001483 Related Documents Link
0001483.06	<p>Potential sanctions on transportation funding - On December 31, 2019, South Coast AQMD and California Air Resources Board submitted a jointly-developed Contingency Measure Plan (Plan) to the U.S. EPA to address the required NOx reductions for attaining the 1997 8-hour ozone standard in 2023. The Plan describes additional regulatory actions, programs, and incentive funding South Coast AQMD and CARB have developed to achieve additional emission reductions, and it highlights the critical need for federal regulatory actions and/or funding to address sources under federal jurisdiction (i.e., aircraft, ships, trains, out-of-state trucks), in order to achieve this standard. If U.S. EPA disapproves the Plan, a federal sanctions clock will be triggered, culminating in highway sanctions if the underlying deficiency cannot be corrected. The imposition of highway sanctions results in the loss of federal funds for transportation projects except for certain safety, transit, and air quality beneficial projects. It should be noted that the U.S. EPA does have the option, under the Clean Air Act section 110(m), to apply discretionary sanctions at any time after a disapproval is made. Given the detrimental impact of sanctions to regional transportation planning, we recommend that SCAG highlight the potential sanctions on transportation funding in the Connect SoCal Plan and provide an estimate of the potential impacts.</p>	<p>A description will be added reflecting the new challenge and its potential implications in the Final Connect SoCal.</p>
0001483.07	<p>Need for new innovative regional freight transportation systems - Although goods movement in the SCAG region provides significant positive local, regional and even national economic benefits, it also brings major challenges, including adverse impacts on local and regional air quality, congestion, safety, and roadways. The projected growth in goods movement activity in the SCAG region will further exacerbate the existing conditions. Given the complex nature of the existing transportation networks used for moving import and export cargo, a comprehensive regional solution is needed to address these challenges while improving overall system efficiency. We believe that fundamental changes to the existing networks used for moving cargo need to be earnestly explored and considered.</p>	<p>Comment noted.</p>
0001483.08	<p>To signal these needed changes, we recommend that the goods movement project list include at least a \$10 billion funding allocation to identify and deploy innovative zero-emission cargo movement system(s) through a collaborative stakeholder process. The proposed project in the Connect SoCal Plan will highlight the critical need for a new and innovative goods movement system for the region and will facilitate solicitation of federal funding. South Coast AQMD is fully committed to participate in this process and provide technical assistance.</p>	<p>SCAG will continue to work closely with regional partners to identify any feasible goods movement strategies that maintain the economic benefits of freight and mitigate the negative impacts that accompany it. As part of the update of its Comprehensive Regional Goods Movement Plan and Implementation Strategy, SCAG will explore a number of strategies to realize these goals. SCAG welcomes the participation of the SCAQMD in its ongoing efforts, including those with regional stakeholders, to identify and advance meaningful strategies to address the impacts of goods movement. Please note that SCAG assumes approximately \$3 billion in allocation for a zero emissions system yet to be defined.</p>
0001483.09	<p>Ports container forecast – The Ports of Los Angeles and Long Beach handled 17.5 million twenty-foot equivalent unit (TEU) containers in 2018, which represents a 49% increase since the last recession in 2009. The 2016 Mercator Report has provided different container growth forecasts under high growth, expected, and low-growth scenarios. Although the projected growth is expected to continue until at least 2040, the Ports are projected to reach capacity before then. We recommend that the Connect SoCal Plan reflect the latest container forecast as well as identify a potential range of uncertainties based on different forecast scenarios which would also affect the port truck vehicle miles traveled (VMT) and associated emissions.</p>	<p>The port container forecast included in the Goods Movement Technical Report represents the most recent capacity-constrained forecast. While SCAG recognizes that there may be fluctuations resulting from different scenarios, the assumptions in the Goods Movement Technical Report are consistent with those of the San Pedro Bay Ports.</p>

ID	Comment	Response
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001483 Related Documents Link
0001483.10	<p>Goods Movement Environmental Strategy and Technology Advancement Plan – Although we fully support the proposed action plan for zero-emission (ZE) technologies, we recommend that the action plan be expanded to include near-zero (NZE) emission technologies with the acknowledgement that these technologies for medium-duty and heavy-duty trucks are currently in the commercial deployment phase, as discussed in the next section. Near-term technologies commercially available now to be readily deployed within the next few years - Near-zero natural gas engine technologies are classified as one of the near-term truck technologies in the draft Goods Movement Technical Report (Appendix 1). However, natural gas engine models offered by Cummins Westport Inc. (CWI) are commercially available today and are certified to meet the optional low NOx standard of 0.02 g/bhp-hr. CWI offers the smaller L9N engine that is well suited for transit buses and refuse trucks as well as the larger 12L engine with up to 400 hp to support the demanding drayage duty cycles. In addition, CWI has recently received a CARB certification for their 6.7L engine to support the medium-duty vehicles segment which includes school buses, shuttles and medium-duty trucks. Additional fueling stations will be needed to support the expected increase in deployment of CNG trucks in the near term.</p>	<p>The use of near-zero emissions technologies is discussed in the Goods Movement Technical report as a bridging technology. SCAG supports the deployment of near-zero emission technologies as they are available, particularly if zero emission technologies are not readily available or are infeasible.</p>
0001483.11	<p>Battery electric trucks have also made significant progress in recent years, especially for the medium-duty vehicles sector. Captive fleets such as shuttles and delivery vans with fixed routes are a good match for this technology as their daily operations can be sufficiently supported by currently available products with 100 to 150 miles in operating range. In addition, because these vehicles are generally recharged overnight at their facilities, charging infrastructure needed to support these vehicles can be tailored based on the anticipated demand and provided in centralized locations. Based on the latest eligible vehicles list for the Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP), there are several medium-duty trucks and vans that are commercially available for some applications and more products are expected to follow in the near future to support a wider range of vehicle types and vocations. As such, medium-duty battery electric trucks should be classified under the near-term technologies, bifurcating them from heavy-duty battery electric trucks which may require a longer timeline for commercialization. We recommend that these updates for be reflected in the Goods Movement Technical Report.</p>	<p>While organizationally SCAG will keep a discussion of all battery electric trucks together, an addition to address medium-duty battery electric trucks was made to the section Near Term Technologies for Trucks in the Goods Movement Technical Report.</p>
0001483.12	<p>Encouraging and incentivizing deployment of NZE and ZE technologies - In addition to incentive funding offered by the California Air Resources Board and South Coast AQMD to help offset the higher purchase price of NZE and ZE trucks, a dedicated lane for these trucks on highways and surface streets as well as at port terminals and railyards can provide an effective non-monetary incentive measure to promote and accelerate deployment of NZE and ZE technologies. We recommend that these types of incentive measures (e.g., dedicated lanes, parking spots/curb areas for deliveries) be considered and incorporated into the proposed goods movement projects, where appropriate.</p>	<p>SCAG agrees that non-monetary incentives, such as preferential access, may be incorporated into infrastructure projects where feasible. SCAG recommends that projects be designed with an awareness of these opportunities. SCAG sees truck-only lanes as one catalyst for the use of zero-emission and near zero-emission truck technologies, improving air quality for communities near the corridor and throughout the region. SCAG continues to explore the potential of such a system along the SR-60 corridor.</p>

ID	Comment	Response
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001483 Related Documents Link
0001483.14	<p>Zero-Emission Infrastructure Study - We appreciate SCAG's proposed study on charging infrastructure needed for electric trucks. This effort is timely and can work well in partnership with other efforts currently underway with the Public Utilities Commission (PUC) and the California Energy Commission (CEC). While those two efforts are focused on the needs and limitations of the electric grid, SCAG can provide a critical perspective and bring unique expertise as a regional transportation planning agency. We encourage SCAG to coordinate with PUC, CEC, and other key stakeholders including local utilities as this proposed study proceeds. We look forward to continuing to engage with SCAG on this effort.</p>	<p>Thank you for your comment. SCAG will coordinate with SCAQMD and other stakeholders on this study and we appreciate your participation.</p>
0001483.15	<p>Attachment 2 - Comments on SCAG's Draft Program Environmental Impact Report for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for SCAG and should be incorporated into the Final PEIR. South Coast AQMD Staff's Summary of Project Description The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range transportation and land use plan for six counties and 191 cities in Southern California (Proposed Project). It takes into account the changing socioeconomic, transportation, financial, technological, and environmental conditions, and serves as a blueprint to guide the region's future transportation and land use development for more than 20 years. It includes a plan of transportation investments and strategies to enhance the performance and safety of the region's transportation network that comprises of highways, arterials, roadways, transit systems, rail, seaports, and airports. It integrates technologies for the transportation and movement of people and goods, including zero and near-zero emissions technologies and infrastructure. The Proposed Project also includes land use strategies that are coordinated with transportation strategies to accommodate a net growth of 3.2 million people, 1.4 million households, and 1.4 million jobs between 2019 and 2045 around job centers, transit priority areas, high quality transit areas, neighborhood mobility areas, and livable corridors. It balances transportation and land use strategies to meet the region's needs in improving air quality and public health, reducing greenhouse gas emissions, and building a more sustainable, equitable, and economically vibrant future.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001483 Related Documents Link
0001483.16	<p>Summary of South Coast AQMD Staff’s Comments on the Air Quality and Health Risk Assessment Analyses in the Draft PEIR Based on reviews of the Draft PEIR and supporting technical documents, South Coast AQMD staff has ten comments on the air quality and health risk analyses. A summary of these comments is provided as follows with additional details provided later in this attachment. 1. CEQA Baseline: SCAG quantified on-road mobile source emissions for the existing conditions without the Proposed Project (year 2019) and the future conditions with the Proposed Project (year 2045) and compared those emissions to determine the level of significance. Based on this analysis, the Proposed Project would mostly reduce emissions, except for PM2.5 and PM10 emissions in some parts of the region due to increases in vehicle miles travel (VMT) between 2019 and 2045 in all counties2. This analysis approach improperly credits the Proposed Project with emission reductions in air quality and health risks that will occur independent of the Proposed Project due to adopted state and federal rules and regulations. SCAG should compare the emissions with the Proposed Project to the emissions without the Proposed Project in the same interim analysis years and use the comparison to determine the level of significance for the Proposed Project’s air quality impacts from on-road mobile sources. 2. Air Quality CEQA Thresholds of Significance: SCAG quantified the Proposed Project’s onroad mobile source emissions of criteria pollutants for the region but did not compare the South Coast AQMD’s portion of the emissions to South Coast AQMD’s regional air quality CEQA significance thresholds to determine the level of significance. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. SCAG should identify the South Coast AQMD’s portion of the on-road mobile source emissions and compare those emissions to South Coast AQMD’s regional air quality CEQA significance thresholds in the Final PEIR to determine the level of significance.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001483 Related Documents Link
0001483.17	<p>3. Interim Analysis Years: The air quality analysis in the Draft PEIR included only two analysis years: baseline year (2019) and buildout year (2045). The overall emission rates of vehicles and trucks are generally higher in earlier years as more stringent emission standards and cleaner technologies have not been fully implemented, and fleets have not fully turned over. With only two analysis years for air quality, the Draft PEIR did not fully and adequately disclose the peak daily emissions from on-road mobile sources. SCAG should include interim analysis years for the air quality analysis, corresponding to the same interim analysis years (i.e., year 2020, year 2030, and year 2035) that were used to quantify the Proposed Project’s greenhouse gas emissions.</p> <p>4. Air Quality Impact Analysis: The Draft PEIR discussed the existing air quality conditions based on the South Coast AQMD’s 2016 AQMP forecasts, but did not quantify emissions from implementing the Proposed Project’s transportation strategies for off-road mobile sources (e.g., locomotives, ocean-going vessels, commercial harbor craft, cargo handling equipment, farm equipment, and aircraft) or land use strategies. However, SCAG quantified GHG emissions for off-road vehicles (rail, aviation, and ocean-going vessels), building energy, and water-related energy consumptions but did not quantify emissions from criteria pollutants for these sources. Therefore, the analysis approach for air quality is not consistent with the GHG emissions analysis which included both on-road and off-road mobile sources, and should be revised in the Final EIR.</p> <p>5. Air Quality Impacts from Overlapping Construction and Operational Activities: The Draft PEIR did not analyze a scenario where construction activities overlap with operational activities. Since the Proposed Project will be implemented over a period of 20 years, an overlapping construction and operation scenario from transportation and land use projects is reasonably foreseeable and should be analyzed in the Final PEIR.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001483 Related Documents Link
0001483.18	<p>6. Health Risk Assessment (HRA) Analysis: SCAG did not utilize South Coast AQMD’s CEQA significance threshold of 10 in a million to determine the level of significance for the Proposed Project’s health risk impacts. Even though some of the transportation segments that were selected for the HRA analysis show cancer risk that would substantially exceed the significance threshold (e.g., 41.3 in a million), SCAG found that the Proposed Project’s health risk impacts would be less than significant because cancer risk for each transportation segment in 2045 is significantly reduced when it is compared to that in 2019. This is an improper comparison to determine the level of significance for cancer risk and should be revised in the Final EIR. (See also Comment No. 1).</p> <p>7. Project-level Air Quality Mitigation Measure: SCAG recommended the use of Tier 4 construction equipment by projects within 500 feet of residences, hospitals, or schools. To encourage the use of Tier 4 Final construction equipment by all types of transportation and land use projects, South Coast AQMD staff recommends the use of Tier 4 Final construction equipment and more information on the implementation and monitoring of this mitigation measure be provided in the Final EIR.</p> <p>8. Additional Project-Level Air Quality Mitigation Measures for On-Road Mobile Sources: The Draft PEIR serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. To facilitate this, South Coast AQMD staff recommends that SCAG include additional project-level mitigation measures for on-road mobile sources in the Final EIR. SCAG should also review the Community Emission Reduction Plans that are prepared pursuant to Assembly Bill 617 to explore whether additional mitigation measures can be identified and included in the Final EIR.</p> <p>9. Additional Project-Level Air Quality Mitigation Measures for Off-Road Mobile Sources: The Draft PEIR did not include project-level air quality mitigation measures for off-road mobile sources (e.g., aircraft and ground service equipment, cargo handling equipment, locomotives, shore power and infrastructure, and ocean-going vessels). Since the Proposed Project includes transportation strategies for rail, seaports, and airports, SCAG should develop and include project-level mitigation measures or performance standards for off-road mobile sources as part of PMM-AQ-1 in the Final EIR.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001483.19	<p>10. Health Risk Reduction Strategies: Although the Proposed Project would result in development of new transportation projects near existing sensitive receptors or locating new receptors near transportation projects, the Draft PEIR did not include a discussion on how to disclose health risks and reduce exposures when new sensitive land uses are sited within 500 feet of freeways or other sources of air pollution. To provide guidance for subsequent, project-level environmental analyses, South Coast AQMD staff recommends that SCAG include a discussion on the mobile source HRA analysis and health risk reduction strategies in the Final PEIR.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001483.20	<p>South Coast AQMD staff’s detailed comments on the Draft EIR’s air quality analysis and health risk assessment are provided as follows. 1. CEQA Baseline Under CEQA, baseline conditions exist at the time of the environmental review is initiated or as they exist at the time the Notice of Preparation (NOP) is published, if there is a published NOP. Notwithstanding this general rule, the use of future baseline is proper in some cases, when supported by substantial evidence in the record. Consideration of future conditions in determining whether a project’s impacts may be significant is consistent with CEQA’s rules regarding baseline, especially when the project has a long-term implementation schedule such as the Proposed Project. “[N]othing in CEQA law precludes an agency ... from considering both types of baseline—existing and future conditions—in its primary analysis of the project’s significant adverse effects.” (Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2013) 57 Cal.4th 439, 454.). “Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. ... [¶] ... The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal.” (See also Communities for a Better Environment v. South Coast Air Quality Management Dist. (2010) 48 Cal.4th 310).</p>	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001506 Related Documents Link
0001506.01	<p>SCAG quantified the Proposed Project’s on-road mobile source emissions for the 2019 baseline year and the 2045 future year. The 2019 existing conditions were held constant (i.e. using emission rates from year 2019) and compared to the 2045 future year (i.e. using emission rates from the future year). SCAG found that ROG and NOx emissions with the Proposed Project in 2045 would be lower than the existing conditions in 2019, but PM2.5 and PM10 emissions would increase due to VMT increases across the region5. This approach using a comparison between the Proposed Project’s impacts in the future year (using emission rates from year 2045) and the 2019 baseline (using emission rates from year 2019) improperly credits the Proposed Project with emission reductions that will occur independent of the Proposed Project due to adopted federal and state rules and regulations, and clean vehicle and fuel technologies, since these rules, regulations, and technologies are expected to improve air quality over time, even in the absence of the Proposed Project, which SCAG has acknowledged in the Draft PEIR6. For example, the California Air Resources Board’s (CARB) current regulation for trucks and buses will provide significant near-term and longterm reductions in NOx emissions from trucks and buses, at 98 tons per day for 20237. Since the Proposed Project anticipates that VMT will increase between 2019 and 2045 in all counties8, NOx emission reductions in year 2045 are likely due to implementation of CARB’s regulation and other efforts at promoting zero and near-zero emissions vehicles and cleaner fuel standards. Therefore, the baseline used to analyze the Proposed Project’s longterm air quality impacts from on-road mobile sources in the Draft PEIR likely led to an under-estimation of actual emission increases, and is misleading and uninformative.</p>	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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0001506.02	<p>The purpose of CEQA is to disclose environmental impacts from the Proposed Project to the public and decision makers to provide the public and decision makers with the actual changes to the environment from the activities involved in the Proposed Project. By taking credit for future emission reductions from existing air quality rules, regulations, and technologies that are not contributed by the Proposed Project, the Proposed Project's air quality impacts are likely underestimated. Therefore, South Coast AQMD staff recommends that SCAG revise the air quality analysis to calculate emissions in year 2019, year 2020, year 2030, year 2035, and year 2045 with the Proposed Project and emissions in those same years without the Proposed Project. These interim analysis years correspond to the same interim analysis years that SCAG used to quantify the Proposed Project's greenhouse gas (GHG) emissions⁹. (See also Comment No. 3). SCAG should compare the emissions with the Proposed Project to the emissions without the Proposed Project in the same interim analysis years and use the comparison to determine the level of significance for the Proposed Project's air quality impacts from on-road mobile sources.² Air Quality CEQA Thresholds of Significance While CEQA allows that a Lead Agency may select a threshold to determine the level of significance, SCAG may not apply a threshold of significance in a manner that precludes consideration of substantial evidence demonstrating that there may be a significant effect on the environment. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. South Coast AQMD's CEQA thresholds of significance for air quality provide a clear quantitative benchmark to determine the level of significance for a project's air quality impacts. Therefore, for most projects within the South Coast AQMD's jurisdiction, South Coast AQMD's air quality CEQA significance thresholds for construction and operation¹⁰ are used to determine the level of significance of a project's air quality impacts.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001506.03	<p>SCAG quantified the Proposed Project’s on-road mobile source emissions of criteria pollutants for the region but did not compare the South Coast AQMD’s portion of the emissions to South Coast AQMD’s regional air quality CEQA significance thresholds to determine the level of significance. Since the South Coast AQMD relies on SCAG’s air quality analysis for on-road mobile sources, South Coast AQMD staff recommends that SCAG identify the South Coast AQMD’s portion of the on-road mobile source emissions and compare those emissions to South Coast AQMD’s regional air quality CEQA significance thresholds in the Final PEIR to determine the level of significance. Using South Coast AQMD’s CEQA significance thresholds would clearly disclose the magnitude of air quality impacts from on-road mobile sources, facilitate the identification of feasible mitigation measures, strengthen the evaluation of the level of impacts before and after mitigation measures, and contribute to the selection of a range of reasonable alternatives to the Proposed Project based on the air quality impacts.</p> <p>3. Air Quality Interim Analysis YearsThe air quality analysis in the Draft PEIR included only two analysis years: baseline year (2019) and buildout year (2045). (See also Comment No.1). Although the Proposed Project may not be at the peak development capacity in earlier years, it is possible that due to higher emission rates of vehicles and trucks in earlier years, peak daily emissions from on-road mobile sources may occur early and gradually decrease over time. The overall emission rates of vehicles and trucks are generally higher in earlier years as more stringent emission standards and cleaner technologies have not been fully implemented, and fleets have not fully turned over. Air quality is improving over time with substantial emission reductions occurring in later years. Therefore, South Coast AQMD staff recommends that SCAG include interim analysis years for the air quality analysis, corresponding to the same interim analysis years (i.e., year 2020, year 2030, and year 2035) that SCAG used to quantify the Proposed Project’s GHG emissions¹¹, to ensure the peak daily emissions are identified and adequately disclosed in the Final PEIR. The interim analysis years will also demonstrate progress in emission reductions over time from implementing the Proposed Project’s strategies and the air quality mitigation measures included in the PEIR.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001506.04	<p>4. Air Quality Impact Analysis Based on the South Coast AQMD’s 2016 AQMP ForecastsAs stated above, the Proposed Project includes transportation strategies and investments for the region’s transportation network of roads, highway, arterials, transit, rail, seaports, and airports. It also includes land use strategies to promote a more compact form of development. To analyze the air quality impacts, SCAG used the South Coast AQMD’s 2016 AQMPforecasts of annual average off-road mobile emissions and stationary source emissions for years 2019, 2022, 2023, 2025, and 2031 in the Basin as a proxy for these emissionsthroughout the SCAG region.This analysis approach is not appropriate for three reasons. First, the 2016 AQMP forecasts are emission inventories and projections, using 2012 as the base year and air quality measures implemented since adopting the 2012 AQMP13. They provide the historic (since 2012) and existing air quality conditions in 2019 at the time the Draft PEIR was prepared. Therefore, SCAG discussed the existing air quality conditions, but did not properly assess the incremental air quality impacts of direct emissions from implementing the Proposed Project’s transportation strategies for off-road mobile sources (e.g., locomotives, ocean-going vessels, commercial harbor craft, cargo handling equipment, farm equipment, and aircraft14) or land use strategies. Second, the 2016 AQMP forecasts include emission projections until year 2031. Since the Proposed Project has a planning horizon until year 2045, it is not appropriate to use the 2016 AQMP forecasts, which are baseline conditions, to analyze the air quality impacts from the Proposed Project, which will be implemented beyond year 2031. Third, the Proposed Project covers a six-county region and includes five air quality and air pollution control districts, including the South Coast AQMD. In the Draft PEIR, SCAG used the 2016 AQMP forecasts for the South Coast AQMD as a proxy for emissions throughout the entire region but did not provide emissions from other air districts or explain why it was appropriate to use the South Coast AQMD’s forecasts as a proxy for the SCAG region. Even if using the 2016 AQMP forecasts is found to be an adequate analysis methodology, SCAG only analyzed a portion of the region within the South Coast AQMD. Therefore, South Coast AQMD staff recommends that SCAG revise the air quality analysis in the Final PEIR based on the following recommendations.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001506.05	<p>Air Quality Analysis for Construction and Operational Air Quality Impacts When specific development is reasonably foreseeable as a result of the goals, policies, and strategies in the Proposed Project, SCAG should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the PEIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Preparing the CEQA analysis “necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can” (CEQA Guideline Section 15144). When the precise construction and operational scenarios are unknown, SCAG should use its best efforts to identify and quantify a worst-case construction and operational air quality impact scenario that is reasonably foreseeable at the time the Draft PEIR is prepared. While this comment may not change SCAG’s findings that the Proposed Project’s construction and operational air quality impacts would be significant and unavoidable¹⁵, a quantitative analysis will facilitate the goal and purpose of CEQA on public disclosure with useful information on the magnitude of air quality impacts that could occur from implementing the Proposed Project and foster meaningful public participation and informed decision making.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001506.06	<p>Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). As discussed in Section 2.0, Project Description, in the Draft PEIR, the Proposed Project anticipates an annual growth rate of 0.6 percent, resulting in a net growth of 3.2 million people, 1.4 million households, and 1.4 million jobs between 2019 and 2045¹⁶. To accommodate growth, SCAG has identified development potential around the region’s job centers, transit priority areas, high quality transit areas, neighborhood mobility areas, and livable corridors. Therefore, SCAG can and should use this information to develop a construction scenario for land use development. One way to calculate the Proposed Project’s construction emissions would be based on an estimated average annual level of development. SCAG should use the most current version of California Emission Estimator Model (CalEEMod)¹⁷ to quantify construction emissions and compare the emissions to air districts’ regional air quality CEQA significance thresholds to determine the level of significance.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001506.07	<p>Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). In Section 3.8, Greenhouse Gases, in the Draft PEIR, in addition to quantifying GHG emissions for on-road mobile sources, SCAG quantified GHG emissions for off-road vehicles (rail, aviation, and ocean-going vessels), building energy, and water-related energy consumptions in year 2019 (baseline year), year 2020 (with and without the Proposed Project), year 2030 (with the Proposed Project), year 2035 (with the Proposed Project), and year 2045 (with and without the Proposed Project)18. To be consistent with the GHG emissions analysis which included both on-road and off-road vehicles, and to provide a better and more complete understanding of the Proposed Project’s operational air quality impacts, South Coast AQMD staff recommends that SCAG quantify the Proposed Project’s operational emissions for off-road vehicles and add those emissions to on-road mobile source emissions to determine the level of significance in the Final PEIR. (See also Comment Nos 1 and 3). If emissions from offroad vehicles are not included in the Final PEIR, SCAG should provide reasons for not including them supported by substantial evidence in the record.5. Air Quality Analysis – Overlapping Construction and Operational ActivitiesBased on a review of the air quality analysis, South Coast AQMD staff found that SCAG did not analyze a scenario where construction activities overlap with operational activities. Since implementation of the Proposed Project is expected to occur over a period of 20 years, an overlapping construction and operation scenario from transportation and land use projects is reasonably foreseeable. Therefore, South Coast AQMD staff recommends that SCAG discuss an air quality impact scenario where construction and operational activities overlap and make a significance determination in the Final PEIR; otherwise, SCAG has not discussed the Proposed Project’s air quality impacts from overlapping construction and operational activities that will likely take place during the implementation of the Proposed Project in the PEIR.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001506.08	<p>6. Health Risk Assessment (HRA) AnalysisImplementation of the Proposed Project would result in development of new transportation projects near existing sensitive receptors or locating new receptors near transportation projects19. SCAG conducted a mobile source HRA analysis to evaluate the cancer risk for residents from exposures to DPM emissions from 16 transportation segments throughout the SCAG region. As shown in Table 3.3-16 in the Draft PEIR, the highest cancer risk would be 41.3 in a million along Interstate 15 in the Victorville area in San Bernardino County (Segment 13: SB I-15 VIC), followed by 30.9 in a million along Interstate 710 in the Compton area in Los Angeles County (Segment 4: LA I-710)20. Because cancer risk for each of transportation segment in 2045 is significantly reduced when it is compared to that in 2019, SCAG determined that the Proposed Project’s health risk impacts would be less than significant.South Coast AQMD staff does not agree with SCAG’s significance determination. It is not appropriate to determine the level of significance for cancer risk based on a comparisonbetween the existing condition (year 2019) and the future condition (year 2045). (See also Comment No. 1 on CEQA Baseline). To determine the level of significance for cancer risk, South Coast AQMD staff recommends that SCAG compare the maximum exposed individual residential cancer risk for each of the transportation segments in 2045 to South Coast AQMD’s CEQA significance threshold of 10 in a million for cancer risk in the Final PEIR. As shown in Table 3.3-16, 12 of 16 transportation segments would exceed the CEQA significance threshold of 10 in a million for cancer risk.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001506.09	<p>7. Recommended Revisions Existing Project-Level Mitigation Measure (PMM-AQ-1 q))SCAG included a project-level air quality mitigation measure (PMM-AQ-1 a) through q) for consideration by lead agencies that implement individual transportation and land use projects. South Coast AQMD staff recommends that SCAG incorporate the following revisions to PMM-AQ-1 q) in the Final PEIR. The recommended revisions will provide more details on the requirement for Tier 4 construction equipment, provide guidance on project-level implementation and monitoring, and facilitate CEQA streamlining and tiering as an option from the PEIR by subsequent, project-level environmental analyses, where appropriate.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001506.10	<p>a) PMM-AQ-1 q) Require projects within 500 feet of residences, hospitals, or schools to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). Include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit’s certified tier specification or model year specification shall be available uponrequest at the time of mobilization of each applicable unit of equipment. Require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipmentmust be tuned and maintained in compliance with the manufacturer’s recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001506.11	<p>8. Additional Recommended Project-Level Mitigation MeasuresCEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse impacts. The Proposed Project is a blueprint for the region’s future development. The Draft PEIR for the Proposed Project serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. Therefore, it is the intent of SCAG that lead agencies for individual transportation and land use projects that may be eligible for CEQA streamlining incorporate project-level mitigation measures as feasible and appropriate to tier from the PEIR.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001506.12	<p>On February 19, 2019, South Coast AQMD staff provided comments on the Notice of Preparation (NOP) for the Proposed Project, available at: http://www.aqmd.gov/docs/defaultsource/ceqa/comment-letters/2019/february/ALL190123-01.pdf, and recommended specific air quality mitigation measures for SCAG to include in the Draft PEIR. South Coast AQMD staff incorporates by reference those recommended mitigation measures and requests that SCAG include them in the Final PEIR. Specifically, SCAG should include the following mitigation measures to reduce and accelerate the reduction of on-road mobile source emissions. The recommended mitigation measures are consistent with the Proposed Project’s goal of improving air quality and public health (Goal No. 5)22, provide guidance on the feasibility of mitigation measures with specific performance standards, and support the Draft PEIR’s intended use as the first-tier, programmatic environmental analysis to facilitate CEQA streamlining and tiering by subsequent, project-level environmental analyses.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001506.13	<ul style="list-style-type: none"> Require zero-emissions (ZE) or near-zero emissions (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet CARB’s adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB’s 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks²³. When requiring ZE or NZE on-road haul trucks, SCAG should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final PEIR, where appropriate. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used, require that operators maintain records of all trucks associated with the operation, and make these records available to SCAG upon request. The records will serve as evidence to prove that each truck called met the minimum 2010 model year engine emission standards. Alternatively, require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable. 	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001506.14	<ul style="list-style-type: none"> Encourage construction contractors to apply for South Coast AQMD “SOON” funds. The “SOON” program provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD’s website: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines. 	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001506.15	<ul style="list-style-type: none"> Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB’s policy²⁴. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the site. To further ensure that drivers understand the vehicle idling requirement, post signs at the site, where appropriate, stating that idling longer than five minutes is not permitted. 	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001506.16	<ul style="list-style-type: none"> Require at least five percent of all vehicle parking spaces include electric vehicle (EV) charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Electrical hookups should be provided at the onsite vehicle stop for to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use. Include analyses to evaluate and identify sufficient power available for zero emissions trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final PEIR, where appropriate. 	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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0001506.17	<ul style="list-style-type: none"> The Proposed Project includes areas that are heavily impacted by air pollution. Assembly Bill (AB) 617, which was signed into law in 2017, requires South Coast AQMD to work with community and other stakeholders to identify and address community concerns in disadvantaged communities suffering from disproportionate air pollution impacts generated from sources, such as marine ports, warehouses, railyard facilities, heavy-duty diesel trucks, and oil drilling and production facilities. Through the AB 617 program, each of the designated AB 617 communities and South Coast AQMD staff develop a Community Emissions Reduction Plan (CERP) that identifies air quality priorities and actions to reduce air pollution in the community. In September 2019, the South Coast AQMD’s Governing Board approved three CERPs for the AB 617 communities of Wilmington, Carson, and West Long Beach; East Los Angeles, Boyle Heights, and West Commerce; and San Bernardino and Muscoy that were designated in 201825. In December 2019, two new AB 617 communities in the Southeast Los Angeles and the Eastern Coachella Valley were designated for inclusion in South Coast AQMD’s AB 617 Program26. South Coast AQMD staff recommends that SCAG review the CERPs27 to explore whether additional mitigation measures can and should be included as part of PMM-AQ-1 in the Final PEIR for transportation and land use projects that may use the PEIR for CEQA streaming and tiering. 	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001506.18	<p>9. Since the Proposed Project includes transportation strategies for rail, seaports, and airports, SCAG should develop and include project-level mitigation measures for off-road mobile sources as part of PMM-AQ-1 in the Final EIR. If the specific details are impractical or infeasible to include, SCAG should develop and include performance standards that the offroad mobile source mitigation measures will achieve (CEQA Guidelines Section 15126.4(a)). Including the mitigation measures and performance standards for off-road mobile sources fulfills SCAG’s legal obligation as SCAG for the Proposed Project to comply with CEQA’s requirements for mitigation measures, serves as a guidance on the feasibility of mitigation measures that can and should be implemented by transportation and land use projects at the region’s seaports and airports, and supports tiering by subsequent, project-level environmental analyses. Specifically, South Coast AQMD staff recommends that the Final PEIR includes the following project-level mitigation measures or other comparable mitigation measures for aircrafts, ground service equipment, cargo handling equipment, locomotives, and ocean-going vessels in PMM-AQ-1.Aircraft and Ground Service Equipment (GSE)• Encourage and incentivize aircraft operators to route the cleanest aircraft engines to serve the South Coast Air Basin. • Consider operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible and as allowed per Federal Aviation Administration guidelines. • Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. • Require the use of GSE that can operate on electric battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.</p>	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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0001506.19	<p>Cargo Handling Equipment (CHE)• Develop specific timelines for transitioning to zero emissions CHE. For example, South Coast AQMD staff recommends a step-down program to require any off-road equipment to be zero emissions first, followed by near-zero emissions, then Tier 4 alternative fuels, and then Tier 4 engine as a floor. The criteria for a step-down program can be based on availability of equipment at the time of purchase and cost of equipment compared to the Tier 4 floor after considering available incentive funds. • Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<i>Submitted by</i> South Coast Air Quality Management District Submittal 0001515 Related Documents Link		
0001506.20	<p>Rail and Locomotives• Offer incentives to encourage the use of on-dock rail. • Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<i>Submitted by</i> South Coast Air Quality Management District Submittal 0001515 Related Documents Link		
0001515.01	<p>Shore Power and Infrastructure• Use shore side electric power for ships, which may include tugboats and other oceangoing- vessels or develop incentives to gradually ramp up the usage of shore power. 13 Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. Ocean-Going Vessels• Maximize participation in the Vessel Speed Reduction Program for all vessels transiting within 40 nautical miles of Point Fermin in the region. • Encourage the participation in the Green Ship Incentives. 10. Health Risk Assessment for New Sensitive Land Uses Near Freeways and Other Sources of Air Pollution and Health Risk Reduction Strategies Notwithstanding the court rulings, South Coast AQMD staff recognizes that the lead agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, South Coast AQMD staff recommends that, prior to approving the project, lead agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary. Implementation of the Proposed Project would result in development of new transportation projects near existing sensitive receptors or locating new receptors near transportation projects 28. To disclose the potential health risks for new sensitive land uses that will be sited within 500 feet of freeways or other sources of air pollution, South Coast AQMD staff recommends a mobile source HRA analysis be performed 29. Since the PEIR is intended to serve as the first-tier, programmatic analysis for projects in the region, South Coast AQMD staff recommends that SCAG include a discussion on the mobile source HRA analysis in the Final PEIR 30 to provide guidance for subsequent, project-level environmental analyses that will tier from the PEIR. Additionally, South Coast AQMD staff recommends that SCAG include the following health risk reduction strategies in the Final PEIR as guidance for future sensitive land use projects that will be sited in close proximity to freeways or other sources of air pollution. These strategies were included in the South Coast AQMD staff's comment letter on the NOP for the Proposed Project 31.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	South Coast Air Quality Management District	Submittal 0001515 Related Documents Link
0001515.02	<p>• Consider high efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better for sensitive land use projects that are located within 500 feet of freeways and other sources of air pollution. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. • Enhanced filtration systems have limitations. In a study that South Coast AQMD conducted to investigate filters³², a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residents prior to assuming that they will sufficiently alleviate health risk exposures to toxic air emissions. • Because of the limitations, South Coast AQMD staff recommends additional details regarding the ongoing, regular monitoring, inspection, and maintenance of filters be provided. To facilitate a good faith effort at full disclosure and provide useful information to future sensitive receptors who will live and/or work in proximity to freeways or other sources of air pollution, the following information should be included, at a minimum, as guidance to future sensitive land use projects in the subsequent, project-level environmental analyses: a) Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);</p>	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<p><i>Submitted by</i> South Coast Air Quality Management District Submittal 0001515 Related Documents Link</p>		
0001515.03	<p>b) Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued;c) Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are inspected and maintained regularly;d) Disclose the potential increase in energy costs for running the HVAC system to prospective residents;e) Provide information to residents on where MERV filters can be purchased;f) Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;g) Identify the responsible entity such as future residents themselves, Homeowner’s Association (HOA), or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the individual project’s lead agency should include this information in the disclosure form);h) Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units;i) Set criteria for assessing progress in installing and replacing the enhanced filtration units; andj) Develop a process for evaluating the effectiveness of the enhanced filtration units.ConclusionPursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that SCAG provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final PEIR. Issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when SCAG makes the finding that the recommended revisions to existing air quality mitigation measures and additional new air quality mitigation measures are not feasible, SCAG should describe the specific reasons supported by substantial evidence for rejecting them in the Final PEIR (CEQA Guidelines Section 15091).</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<p><i>Submitted by</i> Southern California Edison Submittal 0001466 Related Documents Link</p>		
0001466.01	<p>Southern California Edison (SCE) appreciates the opportunity to comment on the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. SCE commends SCAG for its development of the comprehensive future-looking mobility planning document. SCE is proud to be a partner with its communities and customers in our service territory to transition to clean energy, improve air quality, and help meet California’s climate change goals. Consequently, SCE supports the objective of this report and believes that SCAG has focused on the correct components to achieve our common climate goals. SCE believes that we need to make purposeful investments in zero emission solutions now. Based on the Draft List of Priorities, SCE has identified the following areas and regional actions that should be prioritized to help move Southern California and the state toward the goal of carbon neutrality by 2045.</p>	<p>Thank you for your comments. Comments noted.</p>

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<i>Submitted by</i>	Southern California Edison	Submittal 0001466 Related Documents Link
0001466.02	<p>TRANSITION TOWARD DECARBONIZATION In November 2019, SCE released its Pathway 2045 white paper , which promotes an electric-led pathway that examines the implications of California’s long-term decarbonization goals on the electric sector and across the economy. The analysis provides a feasible blueprint for reaching California’s ambitious goals to achieve carbon neutrality by 2045, by using 100% clean electricity, electrifying 75% of transportation and 70% of buildings, and using low-carbon fuels for technologies not yet viable for electrification. Pathway 2045 builds on The Clean Power and Electrification Pathway , SCE’s 2017 analysis of what will be required to meet 2030 interim goals. To meet California’s climate goal of reducing greenhouse gas emissions (GHG) by 40% from 1990 levels by 2030, SCE’s near-term 2030 plan calls for 80% carbon-free electricity supported by energy storage, electrifying at least 24% of light-duty vehicles (7.5 million), and also electrifying 30% of space and water heating. Achieving or exceeding these 2030 goals is required to set up California to meet 2045 goals which are even more ambitious.</p> <p>California has an urgent need for immediate action to mitigate climate change impacts. Given that 2030 is only a decade away, the SCAG region should prioritize actions focused on significantly reducing local pollution and GHG emissions by accelerating the transition toward zero-emission energy, buildings, and transportation.</p>	<p>Comment noted. Connect SoCal focuses primarily on strategies to reduce greenhouse gas (GHG) emissions from cars and light duty trucks. Please see the Sustainable Communities Strategy Technical Report for more details on GHG emission reduction strategies, and the Emerging Technology and Goods Movement Technical Reports for more discussion of zero-emission vehicles.</p>
0001466.03	<p>FOCUS ON TRANSPORTATION As it relates to transportation, near-term action supporting and accelerating zero-emission vehicles and infrastructure draws a more certain path to achieving the state’s GHG targets. Near-zero technologies, such as natural gas combustion truck engines, are important tools for near-term reductions of GHGs and other air pollutants, but investments in these technologies – at the expense of zero-emissions options – present significant risks in reaching GHG targets. A recent study by the climate policy think tank Energy Innovation found that existing policies place California out of reach of GHG goals and that strengthening current actions, such as increasing the goal of adoption of zero-emission vehicles to 7.5 million vehicles from the current goal of 5 million, is key to putting the state on the trajectory to meet the necessary reductions.</p>	<p>Comment noted. The Final Connect SoCal includes a number of strategies to achieve the regional per capita greenhouse gas (GHG) reduction target. Please see the Sustainable Communities Strategy Technical Report for more details on GHG emission reduction strategies, and the Emerging Technology and Goods Movement Technical Reports for more discussion of zero-emission vehicles.</p>
0001466.04	<p>Near-term, meaningful and significant investment in zero-emission vehicles and infrastructure deployment is necessary now in order to set the region and state on a path to ultimately reaching climate goals. Given the expected lifetime of 18 years for a heavy-duty truck, every new internal combustion engine purchase means a truck on the road for almost two decades.</p>	<p>Comment noted. Please see the Sustainable Communities Strategy Technical Report for more details on GHG emission reduction strategies, and the Emerging Technology and Goods Movement Technical Reports for more discussion of zero-emission vehicles.</p>
0001466.05	<p>In order to reach long-term climate goals and local air quality requirements, we need to think about our actions today. The benefits of early incremental actions that create a “soft-landing” approach as opposed to a delayed and sweeping “hard-landing” have been discussed extensively in the literature of technology turnover in decarbonizing economies. This means that every truck electrified in the near-term reduces the overall cost of decarbonization and mitigates the risk of making up for years of delay by softening the steep future adoption trajectory needed to reach our targets.</p>	<p>Thank you for your comment. We look forward to continuing our work with you and others on meeting our regional emissions reduction and sustainability goals.</p>

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0001466.06	<p>Not every truck will be ready to electrify in the near-term, but cases where specific duty cycles or uses present near-term appropriate opportunities to electrify should be sought and taken in early years. The California Air Resources Board cites more than 70 different models of commercially available zero-emission vans, trucks, and buses. As technology advances and economics grow increasingly favorable, the number of vehicles suitable for electrification across segments will increase. Even vehicles in the heavier class segments are evolving faster than expected. The UCLA Luskin Center for Innovation cites drayage trucks in the early commercialization phase with one existing market-ready model and all six major heavy-duty truck manufacturers planning product offerings for Class 8 battery electric trucks in the 2020s, with at least one manufacturer planning a market-ready release as early as next year.</p>	<p>Thank you for your comment. We look forward to continuing our work with you and others on meeting our regional emissions reduction and sustainability goals.</p>
0001466.07	<p>TECHNOLOGY CHANGE, ECONOMICS AND POLICY WILL MAKE ELECTRIFICATION VIABLE IN THE NEAR-TERM The next three years will be watershed in the availability of electric truck models on the market. These new models may challenge prior technology and performance assumptions, with unexpected progressions, presenting compelling technological and economic cases for accelerating adoption in the marketplace across all segments – including the heavier classes. It is important to take stock of these developments to adequately inform transportation planning and decision-making as the region prepares to reach the state’s GHG targets.</p>	<p>Thank you for your comment. The Connect SoCal Goods Movement Technical Report identifies an action plan for advancement of zero emission technology, including heavy duty trucks.</p>
0001466.08	<p>The California Air Resources Board estimates a range of battery electric medium- and heavy-duty vehicles achieving a total cost of ownership parity with diesel by 2024. The UCLA Luskin Center for Innovation in their study of drayage trucks also found that with current incentives, utility programs for electrical infrastructure needs and favorable utility EV rates such as those offered by SCE, and additional revenues from Low Carbon Fuel Standard (LCFS) credits, battery electric trucks serving drayage operations can prove economical by the early 2020s, with costs lower than natural gas trucks and even lower than used diesel trucks. Another report by ICF evaluating medium- and heavy-duty vehicles in California found that by 2030, even without incentives, battery electric trucks and buses are forecast to reach overall favorable economics on a total cost of ownership basis across nearly all medium- and heavy-duty classes. What is worth noting is that two of the largest electric bus manufacturers have established manufacturing facilities in the SCAG region.</p>	<p>Thank you for your comment. The Connect SoCal Goods Movement Technical Report identifies an action plan for advancement of zero emission technology, including heavy duty trucks.</p>
0001466.09	<p>In 2018, the California Public Utilities Commission approved the investment of over \$700 million by the three largest investor owned utilities for electric infrastructure to support expanding charging networks for electric vehicles. SCE was approved for \$356 million over five years (2019-2024) to support infrastructure investments at 870 sites to support the electrification of 8,500 medium- and heavy-duty vehicles. Expanding electric vehicle charging networks connected to an electrical grid that grows cleaner every year promotes the accelerated adoption of technologies that will continue to improve air quality and supports the Southern California region on the path to decarbonizing the region’s economy.</p>	<p>Thank you for your comment. It has been noted.</p>

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0001466.10	For passenger vehicles, SCE supports SCAG’s proposal to develop a regional vehicle incentive programs that can complement existing state incentives. The upfront cost of these technologies is still a key barrier to adoption for low- and moderate-income customers. SCE also applauds the support for installing charging stations at workplaces and other away-from-home locations.	Thank you for your comment. Comment noted.
0001466.11	SCE has been a partner with SCAG members in installing EV chargers through SCE’s Charge Ready Pilot program , which will install more than 2,700 EV charging ports at nearly 150 sites in SCE’s service area, including workplaces, public parking lots, hospitals, destination centers and apartment and condominium complexes. SCE is also awaiting approval from the California Public Utilities Commission (CPUC) for the second phase of the program known as Charge Ready 2. In this phase, SCE is proposing to install infrastructure and provide rebates to support 48,000 new EV charging ports across its service territory. Charge Ready 2 will also address key barriers that are slowing EV adoption — charging availability and a lack of awareness. This includes new solutions to address the unique challenges faced by multi-unit dwellings such as the addition of a rebate program to support the installation of approximately 16,000 EV charging ports in new multi-unit dwellings that are under construction. In the proposal we call for at least 30 percent of the charging infrastructure to be deployed in disadvantaged communities.	Thank you for your comment. We look forward to continuing to work with you to keep our awareness and knowledge of these programs current.
0001466.12	In addition to increasing access to charging infrastructure, SCE commends SCAG for identifying that speed and ease of installation are key variables. By reducing permitting discrepancies across local authorities and focusing on simplifying the steps to approve and install charging infrastructure, local jurisdictions will accelerate deployment and use of charging stations.	Thank you for your comment. Comment noted.
0001466.13	Thank you for considering our comments. We would like to also thank SCAG staff for the ongoing partnership with SCE. We look forward to continuing to partner with you to achieve the goal for a carbon-neutral future, which will benefit all California residents from greatly reduced greenhouse gas emissions, improved air quality, and new economic opportunities.	Thank you for your comment. Comment noted.

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<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001455 Related Documents Link
0001455.01	<p>Ladies and Gentlemen: On behalf of the Southern California Leadership Council (SCLC), the Building Industry Association of Southern California (BIASC) and the other business/industry associations subscribing to this letter, we appreciate this opportunity to comment on the Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal”) and its associated Program Environmental Impact Report (draft “PEIR”). Our comments set forth below relate to both the draft policy document (i.e., the draft Connect SoCal) and the related draft PEIR because our concerns about each are inextricably related. We therefore respectfully ask SCAG to consider our comments below in the context of both SCAG’s policy determinations and its compliance with the California Environmental Quality Act (“CEQA”), the discussion of which begins on page 12 hereof.</p> <p>Our organizations, and the members and industries that they represent, have been involved with the implementation of Senate Bill 375 (2008) (hereinafter “SB 375”) ever since its original introduction. As Southern California stakeholders, we were also highly attentive to and involved in the formulation and adoption by the Southern California Association of Governments (“SCAG”) of its inaugural, 2012 regional transportation plan/sustainable communities strategy (“RTP/SCS”) and its more recent 2016 RTP/SCS. Indeed, we have been heavily involved with SCAG’s activities for the entire last decade. The companies and individuals comprising our collective memberships care very deeply about economic development, job creation and the quality of life in Southern California. Many of our members engage in developing the housing, business properties and infrastructure (i.e. transportation, water, utilities, etc.) that are and will be needed to make the region the best possible place to live and work. Collectively, our organizations also include some of Southern California’s largest private employers. With that in mind, the comments set forth below about SCAG’s draft Connect SoCal and the related draft PEIR are based on our concern for the overall betterment of the SCAG region, its economy, its communities, and its citizens.</p>	Thank you for your comments. Comments noted. Please also see the Final Connect SoCal Program Environmental Impact Report, Chapter 9.0 Responses to Comments.
0001455.02	When we weighed in concerning SCAG’s 2012 RTP/SCS, its 2016 RTP/SCS, and recently in February 2019 concerning the scoping of the PEIR Connect SoCal, our group has consistently espoused principles concerning SCAG’s regional planning efforts; and we’ve always championed consistent policy outcomes. Even more recently, in September 2019, our coalition commented to SCAG concerning its then-proposed allocation of a preliminary sixth-cycle Regional Housing Needs Assessment (RHNA) for the SCAG region. When we did so, we recounted both the principles that we espouse and the societal and economic outcomes that we champion. We will also set them forth again below as they relate to the present context.	Comments noted. Also see the Final Connect SoCal Program Environmental Impact Report, Chapter 9.0 Responses to Comments.

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<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001455 Related Documents Link
0001455.03	<p>But before getting into such details, we will state here briefly our overall view of the draft Connect SoCal and its draft PEIR: Insofar as the draft Connect SoCal relates to the distribution of new housing and purports to accommodate housing production, we believe that it takes large steps leading in the wrong direction. Our region is suffering from an urgent and worsening housing crisis, one which can be solved only through extraordinary increases in housing production and consequent improvements in housing affordability. Yet, if adopted as it is drafted, Connect SoCal will foreseeably combine with SCAG's most recently vetted sixth-cycle RHNA allocation to channel the majority of the region's future homebuilding overwhelmingly into already developed, densely urbanized areas. When combined, they largely aim for the near-total preclusion of other types of reasonable and appropriate community development (specifically suburban, annexed edge, greenfield and new town development). This is a dangerous policy prescription for any region that is suffering from a critical housing crisis, because it depends almost entirely on realizing – without precedent – massive production of the type of new housing that both is the hardest to produce and costs the most. We recognize that SCAG's rationale for its heavy emphasis on infill is caused by increasingly imposing state mandates to reduce per capita VMT. However, we believe SCAG, when planning our region's future, must address and confront the need to balance VMT impacts against housing impacts both wisely and realistically. We believe that, unfortunately, SCAG's most recent proposals do not strike a wise and realistic balance of the kind that is needed now. Instead, if both the draft Connect SoCal and SCAG's recently-vetted RHNA distribution methodology were to be adopted as they are now proposed, they would combine to propel our region in the wrong direction vis-à-vis housing production and affordability. Given the severity of our region's housing crisis and the urgency of this moment, when SCAG's RTP/SCS and RHNA will converge to set a new course for land use throughout Southern California well into the future, it is imperative that we pause and get it right.</p>	<p>Thank you for your comments. We understand your concerns. However, given the statutory constraints, we believe Connect SoCal and RHNA, though separate and distinct planning processes, can work together to address housing and sustainability challenges.</p> <p>The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect SoCal doesn't preclude development of suburban, annexed edge, greenfield, or new town types of housing development. SCAG's 6th cycle RHNA methodology responds to recent changes in housing element law and to the state-mandated determination of 1,341,827 housing units over an 8.25-year period. SCAG realizes that additional programs are needed in the area of supportive zoning, infrastructure, and investment related to infill development types, and that the state's regional determination is high. SCAG is encouraged that additional state support for housing planning and related needs has become available, as well as funding sources such as AB 101 and the incipient programs they will foster. Furthermore, instead of imposing top-down programs, these efforts will allow local jurisdictions to become innovation laboratories for housing solutions which work best in those communities. Also see Master Response #1 regarding the RHNA; and the Sustainable Communities Strategy regarding housing affordability.</p>

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<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001455 Related Documents Link
0001455.04.1.1	<p>Therefore, we respectfully urge SCAG to do what its southern brethren, the San Diego Association of Governments (SANDAG), did recently: seek and obtain permission to take an additional year in which to study and correct its overall regional planning. Our group would like to work with SCAG over the course of 2020 to fashion a much more realistic final Connect SoCal – one that will accommodate the entitlement of new housing units in such quantities, at such locations, and at such levels of affordability as will permit the housing of the SCAG region’s population.</p>	<p>Thank you for your comments. We understand your concerns. However, given the statutory constraints, we believe Connect SoCal and RHNA, though separate and distinct planning processes, can work together to address housing and sustainability challenges.</p> <p>The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect Social doesn't preclude development of suburban, annexed edge, greenfield, or new town types of housing development. SCAG's 6th cycle RHNA methodology responds to recent changes in housing element law and to the state-mandated determination of 1,341,827 housing units over an 8.25-year period. SCAG realizes that additional programs are needed in the area of supportive zoning, infrastructure, and investment related to infill development types, and that the state's regional determination is high. SCAG is encouraged by additional state support for housing planning and related needs, and by funding sources such as AB 101 and the incipient programs they will foster. Furthermore, instead of imposing top-down programs, these efforts will allow local jurisdictions to become innovation laboratories for housing solutions which work best in those communities. Also see Master Response #1 regarding the RHNA.</p>
0001455.04.1.2	<p>Lastly, we strongly urge SCAG to undertake preparation of an alternative planning scenario (APS) alongside a substantially revised and realistic sustainable communities strategy (SCS). As long as the California Air Resources Board (CARB) continues to impose unrealistically high targets for greenhouse gases (GHG) reductions which can be demonstrated only through radical cuts in per capita VMT, consequently worsening of our housing supply and affordability crises, SCAG should recognize and admit that such targets cannot possibly be met consistent with adopting a more realistic and appropriately accommodating SCS. The preparation of a complementary APS, therefore, one that reflects radical VMT reductions that CARB wants to see – however illusory they may ultimately prove to be, would allow SCAG to comply with its statutory requirements while simultaneously putting in place a much more realistic and beneficial RTP/SCS.</p>	Comment noted.

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0001455.04.1.3	<p>As the draft Connect SoCal reads now, poised for its potential final adoption if not changed substantially, it will constitute a harmful policy document vis-à-vis housing supply and affordability at a time when the housing crisis indicates the need for a major course correction in policy. Consistent with this need, SCAG should recognize, grasp, and begin to champion urgently the need for changes in our state government’s planning policies. Specifically, the current policies should be corrected so that SCAG’s still-pending sixth-cycle RHNA allocation and its transportation planning do not continue driving the SCAG region down the road toward unduly centripetal development and re-development, with negative ramifications for housing supply and unaffordability. Accordingly, SCAG should lead regional planning toward a more balanced mix of both urban and peripheral development.</p>	<p>Thank you for your comments. We understand your concerns. However, given the statutory constraints, we believe Connect SoCal and RHNA, though separate and distinct planning processes, can work together to address housing and sustainability challenges.</p> <p>The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect Social doesn't preclude development of suburban, annexed edge, greenfield, or new town types of housing development. Connect SoCal includes strategies to support and encourage infill and urban development but it does not regulate or restrict other potential housing types or locations of such housing, and defers to local jurisdictions for land use decisions. Moreover, this plan has expanded beyond the previous 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to reflect a wide range Priority Growth Areas in addition to infill areas near transit, such as job centers, neighborhood mobility areas, and within spheres of influence. SCAG's 6th cycle RHNA methodology responds to recent changes in housing element law and to the state-mandated determination of 1,341,827 housing units over an 8.25-year period. SCAG realizes that additional programs are needed in the area of supportive zoning, infrastructure, and investment related to infill development types, and that the state's regional determination is high. SCAG is encouraged by additional state support for housing planning and related needs, and by funding sources such as AB 101 and the incipient programs they will foster. Furthermore, instead of imposing top-down programs, these efforts will allow local jurisdictions to become innovation laboratories for housing solutions which work best in those communities. Also see Master Response #1 regarding the RHNA.</p>

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<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001455 Related Documents Link
0001455.05	<p>A. Our Group’s Consistent Principles and Warnings Concerning SCAG’s SCS Planning. As is noted above, as our coalition has worked with SCAG’s staff over the last decade, we have consistently espoused certain principles that we believe are essential to the effective and successful growth and development of the SCAG region. Last September, in connection with our comments concerning the then-proposed sixth-cycle RHNA allocation, we restated our support for sound regional planning that does all the following: -Provides positive economic impacts and is a plan that is conducive to economic growth and job creation – Our organizations and our members are extremely aware of the economic implications of the spatial dispersion of homebuilding. When viewed at all scales (at the regional, the local, and the neighborhood levels), missteps and mistakes concerning how best to distribute land uses can profoundly impact economic vibrancy and stability. Specifically, the RTP/SCS must undergo a true economic cost/benefit analysis so that economic impacts are understood and known by SCAG Regional Council members (and stakeholders) before making a final decision on the RTP/SCS.- Reasonably respects local governments’ prerogatives – Policymakers need to respect the essential role of local government in sound land use decision-making, because local governments (much more than relatively central governments) have the best understanding of local needs, pressures, and aspirations of their growing and evolving communities. Maintaining local control of land use is essential to maintaining so-called “small d” democracy. - Appreciates the organic nature of land use and development – Policymakers must appreciate the organic and dynamic nature of land development over time. Given this reality, land use planning must reflect continuous balancing and rebalancing of possible growth alternatives such as urban redevelopment and densification, and new town or greenfield development.</p>	Thank you for your comments. Comments noted.

ID	Comment	Response
<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001455 Related Documents Link
0001455.06	<p>- Does not impose unrealistic, inflexible land use prescriptions on diverse jurisdictions – Our respective members constitute the businesses and individuals who know how to actually build new homes and communities. Accordingly, we see the many varying opportunities and challenges that are inherent in providing necessary housing throughout the SCAG region. Because of the widespread work that our members regularly undertake, we see the need for local governments to continue to entitle for new housing development or redevelopment on many diverse sites. Local governments must retain and exercise the necessary flexibility to take into account diverse local conditions of all types when making sound land use and entitlement decisions. - Assures that new revenue sources are put in place to allow local governments to plan for achievable densification, while appreciating the beneficial primacy of market forces – Our group has noted in other contexts (such as pertaining to SCAG’s RTP/SCS development) that many of the desired changes in existing land uses are unlikely to occur unless there are put in place new and sufficient financial tools benefiting local government and public infrastructure. For example, in recent years, California dispensed with its erstwhile favorable urban redevelopment agency policies. Such helpful policies and tools must be restored and improved upon if local governments are required to spur positive community development and, especially, redevelopment. - Anticipates and, where possible, overcomes legal and procedural roadblocks to housing construction – For years, our group has been calling for meaningful CEQA reform and other changes which would allow homebuilding to proceed more quickly when faced with NIMBYism and community resistance against change. In this environment, CEQA can be misused to halt progress toward housing goals. Sound regional planning, therefore, should meet all CEQA requirements and, more importantly, facilitate all related streamlining. Additionally, the state should adopt measures necessary to prevent the ongoing abuse of CEQA as a means to stop or significantly delay much needed and worthwhile housing projects.</p>	<p>Comments noted. Regarding revenue sources, SCAG is eligible for approximately \$47 million from HCD under Assembly Bill (AB) 101. These funds would be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation, which is supportive of Connect SoCal goals and policies. In addition, all local jurisdictions in the region will also together receive a total of \$50 million to implement their 6th cycle RHNA allocation. Depending on their population size, local jurisdictions are eligible to receive between \$65,000 and \$1.5 million individually through AB 101 funding to develop and implement their 6th cycle housing element. SCAG is promoting coordination among these funding opportunities to accelerate housing production throughout the region.</p>

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0001455.07	<p>Whereas the principles set forth above are stated as positive characteristics, we have also shared our continuing views about the negative effects of some of the unhelpful policy directives that have been applied in California and the SCAG region. To a large extent, we remain sorely disappointed by the fact that there remain far too many regulatory and legal impediments to homebuilding. Several persistent regulatory trends are actually working against meaningful increases in housing production, and especially production at the scale needed to alleviate our state’s housing crisis. First, there is a strong, growing and thus ever-worsening regulatory preference for fostering transit-oriented, urban infill, and increasingly dense, multi-family development and redevelopment. While we certainly support reasonable efforts to increased production of higher density housing within the urban core, this particular housing type should be deployed in reasonable relative volume, in appropriate locations, and with a clear understanding and appreciation of the heightened costs that are associated with an excessive reliance on such dense, urban-infill housing types. With that in mind, we do not support an over-reliance on increased urban densification to the exclusion of more affordable, common and readily-available community types. The regulatory trend toward an over-emphasis on urban renewal and densification is particularly problematic from an affordability standpoint because the costs of building urban housing is often several times higher (on a square foot basis) than are the costs of other available and potential housing types – particularly less dense, suburban, and peripheral types of development, which are variously called relative “greenfield,” “new town,” “edge,” or “fringe” development.</p>	<p>Thank you for your comments. While Connect SoCal does include strategies to support and encourage infill and urban development, it does not regulate or restrict other potential housing types and defers to local jurisdictions for land use decisions.</p>

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0001455.08	<p>Because the costs of developing and constructing dense urban housing is much higher than other types of homebuilding, fewer households can afford to buy or even to rent such new urban housing, at least not without significant government subsidies or housing assistance programs. As a consequence, the still-growing regulatory preference for more intense urbanization, and the broad disfavoring of any and all greenfield development, are leading to sharp housing cost and price increases. These in turn exacerbate the under-supply of housing, and decrease both home ownership and regional living standards. These harmful trends should be especially alarming to those who are concerned about social equity and economic mobility – because home ownership has long provided a critical pathway for working class households to both secure housing and to accumulate family wealth and financial security. As noted, the excessive regulatory preference for urban densification and redevelopment has been accompanied by complementary regulations aimed at curbing homebuilding activities of all types that do not constitute high-density, urban, “transit-oriented” or so-called “centripital” (i.e., moving toward the center) development. The best example of this is the recently-imposed requirement to apply the California Environmental Quality Act (“CEQA”) to effectively tax and disincentivize vehicle miles traveled (“VMT”) – which is a costly attack on individual mobility alone, with profound implications for millions of prospective households. At a minimum, these new CEQA requirements related to VMT add further disincentives, costs, and hurdles to greenfield and new town development. Concerning these new VMT mandates, everyone can agree on the need for efficient, smart, safe and well-functioning regional transportation solutions. Rather than focusing excessively on reducing VMT and individual vehicular mobility, however, new housing opportunities should be promoted, considered and pursued with proper attention to all of the following: (i) the relative costs of construction and infrastructure,(ii) the public demand for different housing types and at different prices (to accommodate social equity for working households),(iii) the relative costs of providing different housing types in different areas (e.g., urban versus greenfield or edge), and(iv) the complicated relationships among housing and job locations (e.g., achieving a jobs-housing balance sometimes requires putting more housing where jobs are, even when jobs are located outside of the urban core).</p>	<p>Comments noted. While Connect SoCal does include strategies to support and encourage infill and urban development, it does not regulate or restrict other potential housing types and defers to local jurisdictions for land use decisions. Connect SoCal's center focused placemaking approach supports attractive and functional places for Southern California residents to live, work and play, in urban, suburban and rural settings. Please see the Sustainable Communities Strategy Technical Report for further discussion about housing affordability.</p>
0001455.09	<p>Regrettably, the draft Connect SoCal very much perpetuates, incorporates and reflects the harmful policy push toward radical per capita VMT reductions. Again, we appreciate that SCAG feels compelled to do so in light of a state agency's (CARB's) mandate forcing SCAG to focus on VMT reductions as the primary means to demonstrate GHG reductions. In our view, however, the time has come for SCAG to take the lead in pushing back strongly against such state mandates, so that more realistic and ameliorative regional planning can then unfold. In doing so, SCAG should point out to state regulators that its decisions concerning the dispersion of new housing opportunities must take into account not only VMT, but also the real-life, existing, affordable, and dominant housing choices that are made by today's regional workforce. SCAG's ongoing failure to do so will have negative implications for social equity – especially for vulnerable communities. The lack of affordable and available housing in the Southern California region has played a role in exacerbating a number of serious problems such as homelessness, the disappearing middle class and the increasing outward migration from our region.</p>	<p>Comment noted. SCAG is committed to fulfilling its statutory obligations under Government Code §65080 (b)(2)(B), also referred to as Senate Bill 375.</p>

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0001455.10	<p>Lastly, we have seen continuing increases in the costs of entitlement and construction. New and increasing fees and exactions continue to place a disproportionately large fiscal burden on homebuilding activities. Growing mandates for project developers and homebuilders to provide rental or ownership subsidies for the less advantaged, and/or homeless housing funding, will not achieve promised levels of housing production unless such mandates are accompanied by a suite of policies that will expedite entitlement approvals, reduce construction costs, and reduce other fees and exactions. Achieving the level of homebuilding activity necessary to address the current housing crisis will require the circumspect review of and substantial relief from the fiscal and regulatory cost burdens that impede the production of new housing.</p>	<p>Comment noted. Connect SoCal recognizes that the high cost of producing housing is a significant challenge to growth throughout Southern California, and in particular to achieving the level of infill and transit-oriented development anticipated. The Regional Housing Supportive Infrastructure "Key Connection" strategy seeks to expedite production of critically-needed housing in a range of settings. SCAG will continue to provide targeted venues for interested stakeholders to collaborate on potential ways to address high housing production costs.</p>
0001455.11	<p>In short, unless and until SCAG realizes that our region is mired in a worsening crisis concerning both the supply and affordability of new housing opportunities, SCAG will continue to pursue and implement unwise regional planning policies at the insistence of CARB. A substantial course correction is needed; and it should begin now. SCAG needs to take the lead in creating and pursuing such a course correction. If it were to fail to do so, our region will continue to be directed indefinitely toward a bleaker future and unnecessary, worsening crises in terms of both housing supply shortages and housing unaffordability.</p>	<p>Comment noted. A goal of Connect SoCal is to encourage development of diverse housing types in areas that are supported by multiple transportation options. Moreover, the Plan recognizes that the high cost of producing housing is a significant challenge to growth throughout Southern California, and in particular to achieving the level of infill and transit-oriented development anticipated. The Regional Housing Supportive Infrastructure "Key Connection" strategy seeks to expedite production of critically-needed housing in a range of settings. SCAG will continue to provide targeted venues for interested stakeholders to collaborate on potential ways to address high housing production costs.</p>
0001455.12	<p>In light of these concerns, we must note here and express our very strong disappointment concerning the SCAG Regional Council's decision to ignore and reject entirely our September 2019 comments concerning the then-proposed sixth-cycle RHNA allocation for the SCAG region. We set forth in those comments the need for SCAG to expand the areas over which new housing can and should be built to include more vacant land (for suburban, annexed edge, greenfield and new town development). Notably, as we stated in our September comments, we were not opposed to the overall large size of the proposed sixth-cycle RHNA, we were instead concerned about the allocations and ultimately the indicated locations of more than 1.34 million new housing units envisioned within the SCAG region. Specifically, our RNHA concern was and remains about where new housing units can best and most affordably be located and distributed amongst the nearly 200 local jurisdictions within the SCAG region. Housing has a higher likelihood of actually being built if the obligations to provide sufficient building sites for new housing are spread out in a more realistic, balanced and achievable manner. Because of this, we continue to urge SCAG to endeavor to allocate relatively more housing units toward the local jurisdictions that have a relatively meaningful supply of vacant land available.</p> <p>Unfortunately, after we lodged our September 2019 comments concerning the RHNA allocation, SCAG chose to redirect the sixth-cycle RHNA allocation in the opposite direction from that which we advocated. Specifically, SCAG has since voted to squeeze even more of the envisioned homesite allocations into the already urbanized, densely populated, and – importantly – least affordable relatively coastal communities. SCAG should not finalize the currently pending RHNA allocation without improvement; and SCAG most certainly should not hold the course that it is currently on for the entire sixth-cycle RHNA process (which is prescribed to last eight years).</p>	<p>Thank you for your comments. We understand your concerns. However, given the statutory constraints, we believe Connect SoCal and RHNA, though separate and distinct planning processes, can work together to address housing and sustainability challenges.</p> <p>The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect SoCal doesn't preclude development of suburban, annexed edge, greenfield, or new town types of housing development. SCAG's 6th cycle RHNA methodology responds to recent changes in housing element law and to the state-mandated determination of 1,341,827 housing units over an 8.25-year period. SCAG realizes that additional programs are needed in the area of supportive zoning, infrastructure, and investment related to infill development types, and that the state's regional determination is high. SCAG is encouraged by additional state support for housing planning and related needs, and by funding sources such as AB 101 and the incipient programs they will foster. Furthermore, instead of imposing top-down programs, these efforts will allow local jurisdictions to become innovation laboratories for housing solutions which work best in those communities. Also see Master Response #1 regarding the RHNA.</p>

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0001455.13	<p>Similarly, SCAG should be aiming now to adopt a 2020 RTP/SCS that reflects much more realistic assumptions about (i) where within the SCAG region there can be constructed nearly 1.5 million new housing units in the decade of the 2020's, and especially (ii) what will be the affordability of those units. Obviously, a substantial amount – but not all – of the needed additional housing stock can and should be provided as urban infill and through more urban densification. On the other hand, a very substantial portion of the needed additional housing stock will need to be instead in the form of so-called “new towns” and “edge” or “greenfield” development. In short, a meaningful and significant portion of new housing units will need to be planned and built where there is now vacant land. Doing so will undoubtedly conflict with both (i) CARB’s ideal of significantly reducing per capita VMT in the region to unrealistically low levels, and (ii) the Connect SoCal plan as it is now proposed.</p>	<p>Comment noted. Connect SoCal identifies areas within the region sufficient to house near-term and long-term growth and support a diverse economy and workforce. Connect SoCal’s regional strategies are constructed within a Growth Vision that includes areas prioritized for growth. This Growth Vision also places enhanced conservation value on resource areas, key farm lands, and areas vulnerable to natural hazards. However, some growth is still anticipated to occur on vacant lands and in unincorporated areas. See the Growth Vision section of the Sustainable Communities Strategy Technical Report for more details. While Connect SoCal includes strategies to support and encourage infill and urban development, it does not regulate or restrict other potential housing types or locations of such housing, and defers to local jurisdictions for land use decisions.</p>
0001455.14	<p>This is not to say that SCAG’s staff and CARB should abandon their goal of planning for a sustainable region in which per capita GHG-emissions reductions can be realized. Moderate growth (i.e., relatively tempered growth) in per capita VMT is consistent with achieving the kinds of GHG-emissions reduction goals that climate-change scientists argue must be pursued – provided our society makes meaningful, steady improvements in our fleets and fuels over time. Steady improvements in both the efficiency of our transportation fleet and/or fuel options seem increasingly likely to unfold in the years ahead. Importantly, foreseeable improvements in our transportation fleet and fuel options will decrease the GHG-emissions reduction benefit that can be realized through any given decrease in per capita VMT – so much so that if we were to pursue enough of the former (fleet and/or fuel changes) and other technological advances, we would need none of the latter (per capita VMT reductions) to meet our GHG reduction goals.</p>	<p>Comment noted. Connect SoCal includes a number of strategies to achieve the regional per capita greenhouse gas (GHG) reduction target. Please see GHG Reduction Approach in the Sustainable Communities Strategy Technical Report for more details.</p>
0001455.15	<p>B. The Draft Connect SoCal is Fundamentally Contrary to Our Group’s Longstanding Principles and Goals. In light of the above-stated principles and prior consistent urgings, we now encourage SCAG’s staff to re-address and substantially correct the draft Connect SoCal and the related draft PEIR. Rather than adopt these drafts as they are, SCAG should refashion and adopt a 2020-2045 RTP/SCS that will allow for a realistic degree of ongoing per capita VMT growth in and about the SCAG region. To be sure, per capita VMT growth should be tempered and moderated as much as possible. It should even potentially be decreased slightly, but only if such a result can be achieved consistent with the ability to reasonably employ, mobilize and house our region’s growing and partially-homeless population.</p>	<p>Comment noted. It is understood that focusing on any singular strategy for reducing GHG is insufficient for meeting our regional GHG targets, and that efforts toward reducing VMT do not constitute the entirety of mobile source GHG emissions reduction opportunities. However, other strategies, including the development of clean vehicle technologies and adoption of cleaner vehicle fuel standards (as well as GHG emission reductions associated with stationary and other sources), are beyond SCAG’s regional planning purview. For this reason, SCAG’s planning efforts toward reducing GHG emissions to meet our regional climate goals are focused largely, but not exclusively, on containment of per capita VMT growth.</p>

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0001455.16	<p>To do so, SCAG needs to study and promote more new housing opportunities within a more relaxed span of potential locations. Such a direction is desperately needed if our SCAG region is to have any realistic hope of fairly and affordably housing its population. Local governments, in turn, must explore, condition and approve many different kinds of new housing opportunities in the most relatively sensible locations. The new kinds of housing opportunities that should be pursued and their specific siting must take into account and include the following: (1) new urban development and redevelopment opportunities at varying densities, (2) the ongoing growth and expansion of budding and still-growing communities, and (3) well-planned, entirely new communities. To its detriment, the draft Connect SoCal does not appreciably reflect either the ongoing expansion of budding and growing communities, or the future entitlement of any new, well-planned communities. Instead, the draft Connect SoCal largely comports with the same policy direction that underpins its recent RHNA allocation decision.</p>	<p>Thank you for your comments. We understand your concerns. However, given the statutory constraints, we believe Connect SoCal and RHNA, though separate and distinct planning processes, can work together to address housing and sustainability challenges.</p> <p>The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect SoCal doesn't preclude development of suburban, annexed edge, greenfield, or new town types of housing development. SCAG's 6th cycle RHNA methodology responds to recent changes in housing element law and to the state-mandated determination of 1,341,827 housing units over an 8.25-year period. SCAG realizes that additional programs are needed in the area of supportive zoning, infrastructure, and investment related to infill development types, and that the state's regional determination is high. SCAG is encouraged by additional state support for housing planning and related needs, and by funding sources such as AB 101 and the incipient programs they will foster. Furthermore, instead of imposing top-down programs, these efforts will allow local jurisdictions to become innovation laboratories for housing solutions which work best in those communities. Also see Master Response #1 regarding the RHNA.</p>
0001455.17	<p>Even worse, the draft Connect SoCal literally boasts of its policy aim of curtailing any and all such organic development. For example, on page 36 of the draft Connect SoCal, the text reads: The conservation of natural area and farmlands on the edges of urban and suburban development is an integral aspect of Connect SoCal as it incentivizes infill development and the concentration of different land uses. This makes it easier to travel shorter distances which reduces greenhouse gas emissions. Many counties and cities in Southern California have excelled in their work to protect these vulnerable lands, but few plans or policies have been enacted to preserve habitat and farmlands on a regional scale. With regional population increases, conservation decisions made now can safeguard the endurance of these lands, protecting threatened wildlife and the local agricultural economy, and reducing carbon emissions, while also contributing to a high quality of life for future generations.</p>	<p>Thank you for your comments. While Connect SoCal does promote natural area and farmland conservation as one aspect of the Sustainable Communities Strategy, it does not regulate or restrict local jurisdiction land use authority. There is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with Connect SoCal.</p>

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0001455.18	<p>Similarly, the draft Connect SoCal describes all land on the edge of existing development to be regrettably “vulnerable” to development, expressly stating on page 32 of the draft Connect SoCal the following (emphasis added): A range of local conservation plans, habitat conservation agencies and state/federal park designated areas provide protection for a significant amount of natural and farmland in the SCAG region. However, most of these protected lands are in remote desert areas far from incorporated areas Therefore, a substantial amount of land on the urban and suburban fringe is vulnerable to development. Rather than lament the fact that peripheral, vacant land is “vulnerable to” development, SCAG should instead be encouraging local jurisdictions to ascertain which such land “on the urban and suburban fringe” is the most suitable for development. In particular, SCAG should be encouraging the counties’ supervisors, who respectively govern the use of nearly all of the vacant land suitable for smart development, to identify and make available for housing products the “land on the urban and suburban fringe” which is most suitable for smart development.</p>	<p>Thank you for your comments. Connect SoCal’s regional strategies are constructed within a projected land use framework that includes areas prioritized for growth. This land use framework also places enhanced conservation value on resource areas, key farm lands, and areas vulnerable to natural hazards. However, this framework does not dictate local policies or strategies – applying this projected land use framework at the local level is the authority and responsibility of local jurisdictions. To improve clarity of the text, the referenced sentence has been revised to read: "Many of these protected lands are in remote desert areas far from incorporated areas, leaving a substantial amount of land on the urban and suburban fringe susceptible to development."</p>
0001455.19	<p>Importantly, the draft Connect SoCal also boasts of the fact that new single family residential construction has been falling as a percentage of total new residential construction in the SCAG region, while multi-family housing (apartments and attached condominiums) have conversely been gaining in terms of its relative share of all new residential construction. For example, concerning the typology or mix of new housing units in the SCAG region between 2006 and 2016, page 20 of the draft Connect SoCal reads in part: In meeting ... new residents’ demand for housing, the [SCAG] region also added about 400,000 units from 2006 to 2016 – 54 percent of which were multi-family units. Comparing to current conditions in 2016, 39 percent of the region’s housing units are multi-family and 61 percent are single-family units. Riverside County and Los Angeles County again took the highest shares, ... and Los Angeles County added an additional 164,000 housing units - with 90 percent representing multi-family developments, largely occurring in denser areas that are well served by transit. While the draft Connect SoCal thus boasts that new multi-family housing units have been gaining in the relative share of new housing units, the change in relative share has come at the expense of total number of all new housing units (as is shown by Figure 2.4 on page 21 of the draft Connect SoCal). In fact, the data shows that overall new housing production has fallen along with – and most likely primarily due to – a corresponding decrease in single family residential construction.</p>	<p>Thank you for your thoughtful comments. We understand your concerns. However, given the statutory constraints, we believe Connect SoCal and RHNA, though separate and distinct planning processes, can work together to address housing and sustainability challenges. The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect SoCal does not preclude development of suburban, annexed edge, greenfield, or new town types of housing development. A full range of housing types at various densities can be realized in these settings, including multifamily and single-family development. For example, Connect SoCal forecasts that by 2045, single-family development will continue to remain a viable choice for households and will constitute half of the region’s housing stock. Moreover, consistent with Connect SoCal’s sustainable communities strategy of promoting diverse housing choices, center-focused placemaking is included as a tool to achieve a range of housing types and affordability. Local jurisdictions in urban, suburban and rural settings can support implementation of center focused placemaking in ways that are suited to a particular community by implementing a range of options identified in Connect SoCal. SCAG’s 6th cycle RHNA methodology responds to recent changes in housing element law and to the state-mandated determination of 1,341,827 housing units over an 8.25-year period. SCAG realizes that additional programs are needed in the area of supportive zoning, infrastructure, and investment related to infill development types, and that the state’s regional determination is high. SCAG is encouraged by additional state support for housing planning and related needs, and by funding sources such as AB 101 and the incipient programs they will foster. Furthermore, instead of imposing top-down programs, these efforts will allow local jurisdictions to become innovation laboratories for housing solutions which work best in those communities. Also see Master Response #1 regarding the RHNA.</p>

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0001455.20	<p>It must be understood and appreciated as well that the new, relatively-increasingly multi-family housing production about which the draft Connect SoCal boasts (such as Los Angeles County’s additions of mainly “multi-family developments, largely occurring in denser areas that are well served by transit”) tends to be the most expensive type of new residential housing. Indeed, highly urban, dense, new housing is relatively and increasingly unaffordable to most renters – let alone to most would-be homebuyers. To achieve some levels of affordability on this type of housing product often requires government funding, in part or in whole, through various “affordable housing” programs. While we have consistently supported the more reasonable types and levels of these programs and recognize their benefit, we have great concern that these programs are becoming increasingly necessary in order to make this type of housing project affordable. It must be the goal of the RTP/SCS, RHNA and any good housing plan to assure that it accommodates “market rate” affordable housing, which is housing that is built and funded by the private sector and sold or rented at market rates affordable to Southern Californians. Given the size and scope of the region’s housing shortage and the tremendous affordability gap, we must maintain and increase strong private sector participation in new housing production because there is simply not enough government funding to solve this massive problem through the public sector alone. Therefore, we must be wary of plans that are heavily dependent on government subsidies to achieve housing affordability.</p>	<p>Thank you for your thoughtful comments. See the Final Sustainable Communities Strategy regarding housing affordability. Also see Master Response #1 regarding RHNA.</p>
<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001463 Related Documents Link
0001463.01	<p>These facts have led our group to conclude that SCAG needs to reconsider and reverse its policy of championing almost exclusively dense infill redevelopment to the exclusion of all new town, urban edge and greenfield development. Only by reversing such an institutional policy can SCAG play its proper role in solving the housing supply and related housing affordability crises that currently grip the SCAG region and California as a whole.</p>	<p>Thank you for your comments. While Connect SoCal does include strategies to support and encourage infill and urban development, it does not regulate or restrict other potential housing types and locations, and defers to local jurisdictions for land use decisions. Additionally, Connect SoCal's Forecasted Development Pattern includes entitled new greenfield development as conveyed by local jurisdictions and forecasts some future household development to occur on vacant and unincorporated land. See the Final Sustainable Communities Technical Report for more information. Moreover, the Plan recognizes the challenge that the extraordinary cost of producing housing is a significant barrier to growth throughout Southern California, and in particular to achieving the level of infill and transit-oriented development anticipated. The Regional Housing Supportive Infrastructure "Key Connection" strategy seeks to expedite production of critically-needed housing in a range of settings. SCAG will continue to provide targeted venues for interested stakeholders to collaborate on potential ways to address high housing production costs.</p>
0001463.02	<p>C. The Draft PEIR is Inadequate as a CEQA Disclosure Document. As we discussed above, there is no evidence that the policy prescriptions reflected in the draft Connect SoCal will meet either the realistically regarded housing and transportation needs of the region, or provide for sustainability as required by SB 375. We believe that the draft Connect SoCal, if it were to be adopted as proposed, would instead negatively impact many elements of the human environment throughout the SCAG region, such as by greatly worsening vehicular congestion and homelessness, certainly displacing the poor, and the like. The draft PEIR purports to discuss the environmental impacts of the draft Connect SoCal. We believe that the draft PEIR fails to do so adequately.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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0001463.03	<p>The draft Connect SoCal would implement a variety of policy choices aimed at fostering more high density infill housing. The higher density housing typologies that the draft Connect SoCal aims to foster are frequently five to seven times more expensive to build than are one and two-story detached or attached structures in less dense and relatively peripheral communities. The latter communities more typically provide home rental and ownership options at prices that are relatively attainable to the region’s workforce.</p>	<p>Thank you for your comments. While Connect SoCal does include strategies to support and encourage infill and urban development, it does not regulate or restrict other potential housing types and locations, and defers to local jurisdictions for land use decisions. Additionally, SCAG's forecasted development pattern includes entitled new greenfield development and forecasts some future household development to occur on vacant and unincorporated land. See the Final Sustainable Communities Technical Report for more information. Moreover, the Plan recognizes that the high cost of producing housing is a significant challenge to growth throughout Southern California, and in particular to achieving the level of infill and transit-oriented development anticipated. The Regional Housing Supportive Infrastructure "Key Connection" strategy seeks to expedite production of critically-needed housing in a range of settings. SCAG will continue to provide targeted venues for interested stakeholders to collaborate on potential ways to address high housing production costs.</p>
0001463.04	<p>Similarly, the draft Connect SoCal would reject a more diverse range of transportation options (including voter-approved and funded transportation improvements) of types that would increase transportation efficiencies in the region. Instead, the draft Connect SoCal would singularly favor bus, electric scooter, and other transit modes which are either increasingly ineffective (e.g., fixed route bus transit) or infeasible in relation to the needs of many commuters within the region’s workforce (e.g., electric scooter programs, which are no help to our region’s construction workers, who must carry or move tools and material to jobsites).</p>	<p>Comment noted. Connect SoCal incorporates all projects (both highways and transit, as well as other modes) identified in voter-approved local transportation sales tax measures as submitted to SCAG by the county transportation commissions.</p>
0001463.05	<p>As a disclosure document, the draft PEIR fails to identify, analyze, impose legally-mandated, feasible mitigation measures for the reasonably foreseeable consequence of the draft Connect SoCal’s proposed implementation. It fails to disclose the scale and significance of unavoidable adverse impacts for impacts that cannot be mitigated through measures enforced by SCAG. The impacts which were unlawfully omitted from the analysis provided in the draft PEIR include:</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001463.06	<p>- The reasonably foreseeable demolition and displacement of existing uses in and near transit stations and corridors. Such demolition and displacement will cause significant localized noise and air emission impacts, significant new burdens on local infrastructure and public service, the significant or potentially significant displacement of local businesses (which will result in the absence of such businesses or greater travel distances to such local business services), and the significant or potentially significant displacement of existing residents who will most likely be forced to relocate to less costly residential locations farther away from their present workplaces, all with attendant increases in travel-related impacts such as the explosive growth of “supercommuters” with higher commute-related air emissions, health and safety hazards, traffic congestion, and noise impacts.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001463 Related Documents Link
0001463.07	- The reasonably foreseeable ongoing increase in “supercommuters” – even for populations that are not physically displaced by urban, transit-oriented development. As was examined in a recent Chapman University study completed by economist John Husing, even households headed by union construction workers cannot afford a median priced home in any county that touches the ocean in Southern California. The disconnect between the draft Connect SoCal’s high-cost, high-density, disproportionately infill housing vision assures that the pattern that Dr. Husing identified will continue and get worse.	Thank you for your thoughtful comments. We understand your concerns. The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect SoCal doesn't preclude development of suburban, annexed edge, greenfield, or new town types of housing development. Also see the Sustainability Communities Strategy Technical Report regarding housing affordability; and Chapter 9.0, Responses to Comments of the Final PEIR for Connect SoCal.
0001463.08	- The draft PEIR fails to discuss the fact that there are and will remain no practical, fixed-route public transit options to serve the distantly-residing construction workers and other middle class households who need their mobility. The draft Connect SoCal’s prioritization of mass transit over roadway expansions would therefore worsen the growing tendency toward gridlocked conditions. Consequently, work force commutes will lengthen – thereby increasing air emissions and causing other adverse impacts. These are not speculative impacts: both the housing shortage and affordability crises and the performance of the SCAG region’s transportation network worsened after the first two rounds of RTP/SCS plans were adopted; and the draft Connect SoCal, especially when viewed in light of SCAG’s recent actions involving the sixth-cycle RHNA allocation, would effectively double down on the unsuccessful over-dependency and over-emphasis on fixed-route, public transit. SCAG’s own transit studies demonstrate that housing density does not result in increased transit ridership because, in the real world, jobs are widely distributed throughout the region and workers (including low income hourly wage workers) often can practically commute only by using cars.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001463.09	-There is clearly not enough public funding to bridge the massive gap between (i) the costs of constructing high-density, infill-only housing, and (ii) the lower cost of the housing that is actually needed by affordable to middle class households in the region.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001463.10	Relatively affordable housing is widely available outside the SCAG region. Because of California’s stringent building and efficiency codes, and its commitments to renewable energy and electric and other alternative energy vehicles and modes of transit, California’s future residents are projected to have the lowest per capita GHG footprint in the nation. By failing to solve the housing shortage and affordability crises, our society will worsen GHG emissions globally by forcing an increasing number of Californians to relocate to other regions, states or nations where housing is more affordable. Presently, the top three out-migration destinations for departing Californians are Texas, Nevada and Arizona; and they all have far higher per capita GHG emissions. The draft PEIR discusses and analyses no impacts related to such out-migration caused by the draft Connect SoCal’s foreseeable worsening of the housing supply and affordability crises.	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.

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<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001463 Related Documents Link
0001463.11	<p>The Program EIR also fails to identify all feasible mitigation measures for the scores of significant unavoidable adverse impacts it identifies. Even though SCAG cannot itself implement or enforce some potential mitigation measures, CEQA requires that the final EIR must identify feasible measures to avoid or reduce impacts and note, where applicable, that such measures can and should be implemented by other agencies. Measures such as reducing housing costs through accelerated and by-right entitlement approvals, reducing fees and other regulatory costs, and enhancing local government revenues with tax-increment financing to pay for the community infrastructure and public service improvements needed to accommodate new housing, are omitted from the PEIR. The omission must be corrected.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001463.12	<p>The draft PEIR does and analyze the foreseeable failure of VMT reduction policies, taking into account the region’s plummeting transit ridership and the evidence that any growing population which enjoys strong employment typically has increased or barely reduced per capita VMT; but has never significantly reduced it. The draft PEIR fails to identify and alternate GHG reduction strategies (other than VMT reduction) which could more feasibly and beneficially reduce regional GHG. Moreover, even if CARB continues to dictate that SCAG must envision and plan for large per capita VMT reductions, the draft PEIR should have analyzed and discussed the broader environmental impacts and potential mitigation of such a policy.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001463.13	<p>In addition, the draft PEIR also omits any discussion of the reasonably foreseeable cumulative impacts that will flow from the 2019 determination that SCAG must allocate more than 1.34 new housing units through the RHNA process for the sixth cycle of RHNA, and that SCAG has already decided to disproportionately allocate that large number of housing units to the more expensive, relatively near-coastal areas and communities. Although the localities’ respective general plans have not yet been amended to make sites available for these housing unit allocations, CEQA does not allow for the deferral of consideration of cumulative impacts analyses for reasonably foreseeable new projects and activities simply because they have not yet been fully or finally approved. The draft PEIR must be reworked to include discussion of the consequences of tripling the availability of housing unit sites and SCAG’s decision to largely focus this large quantity of new potential housing units in the already dense, expensive near-coastal communities.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001463.14	<p>Finally, because of all of the concerns which are stated above in this comment letter, the draft Connect SoCal policy document and the related draft PEIR should each be revised to include an alternative – one that will actually result in more ameliorative housing and transportation solutions for the region.</p>	<p>Comment noted. For PEIR related comments, see Chapter 9.0, Responses to Comments of the Final PEIR for the Connect SoCal.</p>
0001463.15	<p>The draft PEIR’s fails to adequately identify, analyze and/or discuss the mitigation of environmental impacts. It fails to identify the reasonably foreseeable consequences of the cumulative housing increase prescribed by the RHNA process. Both it and the draft Connect SoCal fail to identify and analyze an alternative that would actually result in housing and transportation solutions needed by this region. These are all flaws that can be remedied only if SCAG were to recirculate a revised draft PEIR which corrects its deficiencies. This is all the more reason for SCAG to seek and obtain a one-year extension in additional time to revise and ultimately adopt a better Connect SoCal.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

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<i>Submitted by</i>	Southern California Leadership Council	Submittal 0001463 Related Documents Link
0001463.16	D. Conclusion. To summarize our conclusions: - We believe that the draft Connect SoCal compounds the policy mistakes that were latent in SCAG’s prior two RTP/SCSs but are now recognizable in light of the housing crisis; and it is, therefore, not a sound plan for the region. Whereas a major policy course correction is needed to best address the region’s housing supply dearth and housing affordability crisis, the draft Connect SoCal would combine with SCAG presently-proceeding RHNA allocation to worsen these crises.	Thank you for your thoughtful comments. We understand your concerns. However, given the statutory constraints, we believe Connect SoCal and RHNA, though separate and distinct planning processes, can work together to address housing and sustainability challenges. The sustainable communities strategies reflected in Connect SoCal, encourage implementation of VMT-reduction strategies related to reducing greenhouse gas (GHG) emissions. While infill, urban development types, integrated with the multi-modal transportation system, are encouraged in order to meet state-mandated GHG targets, Connect SoCal doesn’t preclude development of suburban, annexed edge, greenfield, or new town types of housing development. SCAG’s 6th cycle RHNA methodology responds to recent changes in housing element law and to the state-mandated determination of 1,341,827 housing units over an 8.25-year period. SCAG realizes that additional programs are needed in the area of supportive zoning, infrastructure, and investment related to infill development types, and that the state’s regional determination is high. While SCAG shares the frustration that additional state support for housing planning and related needs arrived after the mandate of the 6th cycle RHNA determination, we are encouraged by funding sources such as AB 101 and the incipient programs they will foster. Furthermore, instead of imposing top-down programs, these efforts will allow local jurisdictions to become innovation laboratories for housing solutions which work best in those communities. Also see Master Response #1 regarding the RHNA; and the Sustainability Communities Strategy Technical Report regarding housing affordability.
0001463.17	- SCAG should therefore request a one-year extension of time during which to entirely revisit the draft Connect SoCal, and substantively re-make it with a view toward better balancing the environmental and transportation goals of the RTP/SCS with approaches that will address more urgently and deliberately the region’s housing supply and affordability crises	Comment noted.
0001463.18	The draft PEIR is legally infirm as it now reads, and should be redone when analyzing a substantially new, more realistic and more achievable regional plan	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001463.19	-If we are correct in assuming that a resulting, newly-drafted, more realistic and more achievable regional plan will conflict with CARB’s overly-ambitious per capita VMT reduction, then we urge SCAG to prepare and adopt both a SCS and a complementary APS for presentation to CARB.	Comment noted. SCAG is committed to meeting its statutory requirements under Government Code §65080 (b)(2)(B).

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<i>Submitted by</i> Southern California Leadership Council Submittal 0001463 Related Documents Link		
0001463.20	<p>We have always recognized the daunting regulatory and administrative challenges that are inherent in SB 375 and the federal requirements with which SCAG must comply. We recognize that it will be a major challenge for SCAG's staff to re-evaluate all of the VMT implications of envisioning a more circumspect regional land use plan than those which underpinned SCAG's last two RTP/SCSs and now underpin the draft Connect SoCal and its draft PEIR. It is especially challenging to do so in a way that better accommodates the large housing needs assessment that must be allocated regionally via the sixth-cycle RHNA process. We remain, however, confident in SCAG and both its Regional Council and professional staff to lead the way on smart, innovative approaches for solving our region's most daunting problems. Likewise, given our longstanding involvement with the SB 375 process and the depth of our concerns, we look forward to continuing to work with SCAG and participating in ongoing discussions about Connect SoCal. With such collaboration in mind, we respectfully ask for your meaningful consideration of these comments.</p>	<p>Thank you for your comments. Comments noted. SCAG will make sincere efforts to continue working with the Southern California Leadership Council as well as other building industry and private sector stakeholders on addressing these important issues.</p>
<i>Submitted by</i> Southern California Regional Rail Authority (SCRRA) Submittal 0001520 Related Documents Link		
0001520.01	<p>The Southern California Regional Rail Authority (SCRRA) has reviewed the Draft Connect SoCal Plan, SCAG's Regional Transportation/Sustainable Communities Strategy (RTP/SCS) for 2020- 2045. We appreciate your clearly articulated vision as well as your detailed description of your plan and goals. Importantly, we are pleased to see the prominent role that the Metrolink regional rail system plays in linking five of SCAG's six counties together. Particularly, the inclusion of the capital program and resultant service growth, known as Southern California Optimized Rail Expansion (SCORE) highlights the value of Metrolink growth over time. We appreciate the articulation of the achievements of the Metrolink system as well as the inclusion of a listing of significant future investments in the Metrolink system in the Passenger Rail Technical Report. SCRRA applauds SCAG's planning efforts in analyzing the benefits of a long-range vision plan that balances future mobility and housing needs with economic, environmental and public health goals. SCRRA has provided detailed comments for your consideration in Attachment A to this letter.</p>	<p>Thank you for your comments.</p>
0001520.02	<p>We thank you for allowing us to provide input into the Draft Connect SoCal Plan and look forward to the adoption of the transformative Connect SoCal Plan which will help improve the transportation network and expand regional mobility opportunities.</p>	<p>Thank you for your comments.</p>
0001520.03	<p>Attachment A- Detailed Comments to Draft Connect SoCal Plan (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS)General Comments1. Number of Trains and Route Miles- Update all references for weekday trains and mileage to 173 and 538 respectively to maintain consistency throughout the plan and applicable technical reports.</p>	<p>Thank you for your comment. The Connect SoCal main document and Passenger Rail Technical report will be edited per the comment.</p>
0001520.04	<p>2. Metrolink Infrastructure Rehabilitation- We suggest including the following language related to Metrolink's rehabilitation efforts, "As rehabilitation plans are refined in strategic planning processes at SCRRA, future revisions of SCAG's RTP/SCS should incorporate SCRRA's refinements. State of Good Repair (SOGR) for transit systems is essential in sustaining the backbone for sustainable travel in the region."</p>	<p>Comment noted. SCAG will continue to work with Metrolink and the region's fixed route transit providers on improving the performance-based planning for State of Good Repair to ensure sufficient resources are dedicated to transit system rehabilitation and preservation.</p>

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<i>Submitted by</i>	Southern California Regional Rail Authority (SCRRA)	Submittal 0001520 Related Documents Link
0001520.05	Draft Connect SoCal Plan 3. Core Vision, pg. 4 -Suggest adding "personal, social, and environmental cost" or something similar to match core vision goals to the draft text, "We must enhance and build out the transit network as the backbone of a mobility system that allows people to move freely without the expense of a car."	Comment noted. The edits have been made to text wherever applicable.
0001520.06	4. Transportation Safety, pg. 38- Rename or consider other transportation safety issues (e.g. safe rail crossings) since the entire section deals with traffic-related safety.	Comment noted. This portion of the Plan highlights only a selection of the region's present and future challenges. For more information on other areas of transportation safety, including transit and rail, please review the Transit, Passenger Rail, and Goods Movement Technical Reports.
0001520.07	5. Core Vision/Transit Backbone, Progress Since 2016, pg. 65- Add the following milestones:• The opening of the Perris Valley Line, a 24-mile extension of the 91 Line that is Metrolink's first major expansion since 1994.• The first of Metrolink's 40 new clean fuel-powered Tier 4 locomotives begin service. There are currently 30 Tier 4 locomotives in service today. The Tier 4 trains reduce emissions by up to 85%.• Metrolink extended service on the San Bernardino and Inland Empire/Orange County lines with a new station in downtown San Bernardino, adjacent to the San Bernardino Transit Center, connecting riders to multiple regional transit agencies.	Thank you for your comment. Additional details about recent progress on the Metrolink system is included in the Passenger Rail Technical Report.
0001520.08	6. Transportation Safety, pg.71 -This section speaks solely to traffic-related safety. As per the same comment for pg. 38, rename or include other transportation safety issues (e.g. safe rail crossings).	Comment noted. This portion of the Plan highlights only a selection of the region's present and future challenges. For more information on other areas of transportation safety, including transit and rail, please review the Transit, Passenger Rail, and Goods Movement Technical Reports.
0001520.09	Passenger Rail Technical Report7. High-Quality Transit Area Vision Plans, pg. 3- Name the five cities that SCAG partnered with to develop the High-Quality Transit Area (HQTA) Vision Plans.	Thank you for your comment. Page 3 of the Passenger Rail Technical Report will be edited per the comment.
0001520.10	Also, provide a definition of HQTAs here and clarify the definition of HQTAs to indicate that 'HGTAs are corridor-focused Priority Growth Areas within one half mile of either an existing or planned fixed guideway transit stop (with no frequency requirement) or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours.'	Thank you for your comment. The Passenger Rail Technical Report will be revised to reference Chapter 3 of Connect SoCal and the Sustainable Communities Strategy Technical Report for more detailed discussion about HQTAs.
0001520.11	8. Federal Definitions, pg. 3- Update the Federal definitions for commuter rail, intercity rail, high-speed rail and other rail modes. There also should be a clear distinction when describing rail corridors that are shared by multiple operators such as commuter and freight.	Thank you for your comment. The Regulatory Framework section of the Passenger Rail Technical Report on pages 3 and 4 will be revised per the comment.
0001520.12	9. Modeling Approach and Ridership, pg. 5- Replace the word project to program, "In the horizon year, the full buildout of the Metrolink SCORE program is assumed."	Thank you for your comment. Page 5 of the Passenger Rail Technical Report will be edited per the comment.

ID	Comment	Response
<p><i>Submitted by</i> Southern California Regional Rail Authority (SCRRA) Submittal 0001520 Related Documents Link</p>		
0001520.13	<p>10. Connectivity and Gaps in Service, pg. 6- Replace the word service with corridor, "and the Amtrak Pacific Surfliner, which is the second busiest Amtrak corridor behind the Northeast Corridor." In reference to Metro planning BRT service, Metrolink has three stations in Burbank now (Burbank Airport- South (VC) Line, Burbank Airport- North (AV Line), and- Burbank Downtown. Modify the following text, "This future BRT service could connect multiple Metrolink stations in Burbank and, at some point in the future, an additional station serving California High Speed Rail."</p>	<p>Thank you for your comment. Page 6 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001520.14	<p>11. Graphics, pg. 9-We suggest adding photographs of Tier IV locomotives, new stations, etc. Maps should have station names, line names, and Metrolink line colors where applicable in the Connect So Cal plan as well as technical reports.</p>	<p>Comment noted.</p>
0001520.15	<p>12. Metrolink Sustainability, pgs. 10,12- Update the following statistics related to Metrolink:• 8,500,000 weekday automobile trips to 9,300,000 (2019)• 82 percent of Metrolink riders have a car for their trip, thereby providing more capacity on our region's freeways" to "85 percent of Metrolink riders have a car but choose to ride the train, relieving congestion on the region's freeways."• 178,200 metric tons to 130,000 metric tons for GHG, which is the equivalent of the carbon sequestered by 169,774 acres of U.S. forests in one year (Environmental Protection Agency- Greenhouse Gas Equivalencies Calculator, 2019).</p>	<p>Thank you for your comment. Pages 10 and 12 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001520.16	<p>13. Metrolink Services, Exhibit 2, pg. 11 -As per earlier response #6/third bullet item. Please include the San Bernardino- Downtown Station. The map also shows Placentia as an existing station which it currently is not.</p>	<p>Thank you for your comment. Exhibit 2 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001520.17	<p>14. Metrolink Sustainability, Fuel Conversation Program, pg. 12- Correct the subheading from "Fuel Conversation Program" to Fuel Conservation Program.</p>	<p>Thank you for your comment. Page 12 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001520.18	<p>15. Metrolink Sustainability, Positive Train Control, pg. 12- Add the following text under Positive Train Control (PTC), "PTC is a critical safety technology that prevents train-on-train collisions, over speed derailments, and unauthorized train movements." We recommend removing the following statement, "PTC conserves fuel with more gradual and controlled acceleration and deceleration". There currently is not a commuter or passenger railroad system that uses PTC for fuel conservation. This is something that freight railroads have developed called energy management and it is intended for freight operations to have smooth uninterrupted trips.</p>	<p>Thank you for your comment. Page 12 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001520.19	<p>16. Metro link Stations, pg. 18- Retitle the heading to "New Metrolink Stations". The previous sections address existing ones and this section discusses only new stations. Redlands Rail Arrow stations should be mentioned in this section.</p>	<p>Thank you for your comment. Page 18 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001520.20	<p>17. Metrolink Ridership, Figure 4, pg. 22- Update the graphic to show correct FY11- 19 systemwide ridership.(See attachment for table)</p>	<p>Thank you for your comment. Figure 4 of the Passenger Rail Technical Report will be edited per the comment.</p>
<p><i>Submitted by</i> Southern California Regional Rail Authority (SCRRA) Submittal 0001521 Related Documents Link</p>		
0001521.01	<p>18. Metrolink On-Time Performance, Figure 5, pg. 22- Update the graphic to show correct FY14-19 on-time performance.(See attachment for table)</p>	<p>Thank you for your comment. Figure 5 of the Passenger Rail Technical Report will be edited per the comment.</p>

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<i>Submitted by</i>	Southern California Regional Rail Authority (SCRRA)	Submittal 0001521 Related Documents Link
0001521.02	19. Metro link Farebox Recovery, Figure 6, pg. 23 -Update the graphic to show correct farebox recovery.(See attachment for table)	Thank you for your comment. Figure 6 of the Passenger Rail Technical Report will be edited per the comment.
0001521.03	20. Emerging Trends, pg. 23- Add the phrase, "Contributing to increased ridership has been Metrolink's increased marketing investment, targeted discounts on select lines, and a strong regional economy." It is important for Metrolink to acknowledge the factors to increased ridership. Also, include more recent data on ridership to highlight recent achievements in all-time record high ridership for the Metrolink system.	Thank you for your comment. Page 23 of the Passenger Rail Technical Report will be edited per the comment.
0001521.04	21. Emerging Trends, pg. 24 -Remove the following text, "to the point where the fare adjustment has been revenue neutral".	Thank you for your comment. Page 24 of the Passenger Rail Technical Report will be edited per the comment.
0001521.05	22. PTC Implementation Cost, pg. 24-We recommend updating the total cost of implementation to \$250 million.	Thank you for your comment. Page 24 of the Passenger Rail Technical Report will be edited per the comment.
0001521.06	23. Rosecrans/Marquardt Grade Separation, pg. 24- As of fall 2019, the BNSF has completed the triple track between Redondo Junction and Fullerton Junction. Completing this grade separation will constitute the final part of that effort, but the actual third track is already complete.	Thank you for your comment. Page 24 of the Passenger Rail Technical Report will be edited per the comment.
0001521.07	24. Redlands Rail Map, Exhibit 5, pg. 25-Add the San Bernardino- Downtown Station as it is missing from the Redlands Rail map. Remove the Placentia station from the map as it is not currently an existing station.	Thank you for your comment. Exhibit 5 of the Passenger Rail Technical Report will be edited per the comment.
0001521.08	25. Redlands Passenger Rail, pg. 26- Revise the scheduled revenue start date from 2021 to 2022 per the December 13, 2019 Metrolink Board Report, Item #17.	Thank you for your comment. Page 26 of the Passenger Rail Technical Report will be edited per the comment.
0001521.09	26. Van Nuys Station Platform, pg. 26- The new island platform is operational.	Thank you for your comment. Page 26 of the Passenger Rail Technical Report will be edited per the comment.
0001521.10	27. Projects in Development, pg. 28- Include text that mentions that the Brighton to Roxford Double Track project is not fully funded and may be implemented in pieces per Metro's Antelope Valley Line Study.	Thank you for your comment. Page 26 of the Passenger Rail Technical Report will be edited per the comment.
0001521.11	28.Active Transportation, pg. 32- Remove the following text, "car sharing services such as Uber and Lyft" from this section. SCRRA acknowledges that car sharing services are motorized services that can nonetheless support commuter rail service and expand commuter rail's catchment area. However, it should not be considered an Active Transportation strategy.	Thank you for your comment. Page 32 of the Passenger Rail report will be edited to revise the section heading to reference first/last mile strategies, not only active transportation.
0001521.12	29. Free Local Transfer program, pg. 32- Metrolink has, for many years, maintained agreements with 32 connecting local transit operators in Southern California to allow passengers with Metrolink tickets to transfer for free to and from connectinglocal transit.	Thank you for your comment. The Cooperative Fare Agreements and Media section of the Passenger Rail Technical Report will be revised per the comment.
0001521.13	30. Cooperative Agreement, pg. 32- Add text that mentions Amtrak Pacific Surfliner Monthly Pass holders may ride any Metrolink train and Metrolink Pass holders may ride any Pacific Surfliner train within the station pairs on their pass at no additional charge.	Thank you for your comment. The Cooperative Fare Agreements and Media section of the Passenger Rail Technical Report will be revised per the comment.

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<p><i>Submitted by</i> Southern California Regional Rail Authority (SCRRA) Submittal 0001521 Related Documents Link</p>		
0001521.14	<p>31. Airport Ground Access, pgs. 32-33- Metrolink is connected to Burbank, LAX, Ontario, and John Wayne airports via various means: o BUR- Burbank Airport Within easy walking distance of the VC Line Metro link station, and connected via a free on-demand shuttle to the AV Line Metrolink station o LAX - Los Angeles Airport Connected via LAX Fly-Away from Union Station. Through-ticketing is offered so passengers can buy a ticket to or from LAX o ONT- Ontario Airport Connected via free Lyft rides (up to \$35) from Ontario- East, Montclair, Upland, or Rancho Cucamonga station o SNA- John Wayne Airport (Orange County) Connected to Tustin Metrolink Station via iShuttle Route 400A. This shuttle operates bi-directionally on weekday mornings and evenings and is free with a Metrolink ticket</p>	<p>Thank you for your comment. The Airport Ground Access section of the Passenger Rail Technical Report will be edited per the comment.</p>
0001521.15	<p>32. Constrained Plan Projects Map, pg. 35- Add the Redlands Rail Project as it is already under construction and should be included.</p>	<p>Thank you for your comment. Exhibit 7 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001521.16	<p>33. Metrolink SCORE Projects, pg. 36- SCRRA is willing to work with SCAG staff to verify SCORE projects that are mapped in the Connect SoCal Plan to ensure accuracy and consistency.</p>	<p>Comment noted.</p>
0001521.17	<p>34. Strategic Plan Projects Map, Exhibit 9, pg. 43- The map shows a Metrolink San Jacinto Extension but it is not mentioned elsewhere in the technical report. A reference should be added.</p>	<p>Thank you for your comment. The Metrolink San Jacinto Extension is not a Strategic Plan project and Exhibit 9 will be revised accordingly.</p>
<p><i>Submitted by</i> Transportation Corridor Agencies Submittal 0001449 Related Documents Link</p>		
0001449.01	<p>The San Joaquin Hills Transportation Agency and the Foothill/Eastern Transportation Corridor Agency (“TCA”) appreciates the opportunity to review and provide comments on the Draft Connect SoCal Plan 2020-2045 Regional Transportation Plan (“RTP”)/Sustainable Communities Strategy (“SCS”) and associated Draft Programmatic Environmental Impact Report (“PEIR”). TCA commends the Southern California Association of Governments (SCAG) staff and consultants for the tremendous amount of work and effort in putting these documents together. TCA also recognizes and supports the timely adoption of the RTP/SCS to enable the Southern California region to proceed with the planning and implementation of regionally significant transportation projects. Further, TCA recognizes that the SCS is particularly important for the region to meet its state-mandated greenhouse gas (GHG) emissions reduction targets for 2020 and 2035. TCA supports the comments submitted by the Orange County Council of Governments (OCCOG) on behalf of Orange County jurisdictions, the Center for Demographic Research, the Orange County Transportation Authority, and other Orange County jurisdictions. In addition, TCA submits the following comments to clarify the RTP/SCS Project List Technical Report and offer recommended clarification to the documents text.</p>	<p>Thank you for your comment. Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	Transportation Corridor Agencies	Submittal 0001449 Related Documents Link
0001449.02	<p>The TCA are two joint-powers agencies formed in 1986 to plan, finance, construct and operate State Routes 73, 133, 241 and 261 (The Toll Roads), which constitute 20 percent of Orange County’s major thoroughfares (see attached Toll Road System Map). The Toll Roads were originally planned as freeways; however, due to a lack of state funding they had to be built as tolled roads. To finance the roads, toll revenue bonds were sold as the major funding source [private funds] and development impact fees have been assessed on new construction under Section 66484.3 of the California Government Code. Consistent with the goals of AB 32 and SB 375, the Toll Road network helps to reduce GHG emissions that would otherwise be emitted by idling passenger cars and trucks on freeways and major arterials, by providing free-flow congestion relief. While these roads are a significant part of the major highway system in Orange County and the region and are, indeed, included in the core revenues from local sources (Highway Tolls), Figure 4.10, Core Revenues, Local Sources, in Nominal Dollars (page 105), Table 4.5 Summary of Revenues (page 108), Table 4.6.1 FY2045 RTP/SCS Revenues, in Nominal Dollars, Billions (page112), they are not included in the discussion regarding transportation system (page 23), transportation demand management (page 64), transportation system management (page 64), highway and arterial network (page 73), regional express lane network (page 74) or paying our way forward (page 97). Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, expansions, and new tolled facilities that are privately funded are included in the plan and in the total cost of the plan. Focus in the Draft Connect SoCal Plan as well as the Draft PEIR is only on toll lanes and express/high occupancy toll lanes. Accurately describing the extent of private funding for highways 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.</p>	<p>Thank you for your comment. Suggested changes will be considered in the final Connect SoCal. For changes to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 10.0, Corrections and Additions, of the Final Connect SoCal PEIR.</p>
0001449.03	<p>Recommended ClarificationTCA requests that the language in the Draft Connect SoCal Plan and associated PEIR be expanded to appropriately describe the existing and planned inter-operable priced transportation network in the region, including Express Lanes, HOT lanes, and Toll Roads, specifically acknowledging the following points:•Priced lanes provide flexibility and options as part of the congestion relief toolbox of measuresdesigned to help meet sustainability and emission reduction goals related to SB 375 and otherstate and federal mandates.•Priced facilities are an especially important tool for providing intra-county, inter- county andinterregional capacity.•The existing priced transportation network serves the locations where major employment andhousing growth are projected to occur.•Toll roads and express/HOT lanes charge users a fee for travel, but typically offer lesscongested traffic lanes than nearby freeways and roadways. Reduced congestion providesimproved and more efficient mobility with fewer air pollutants and GHG emissions caused bycongestion.</p>	<p>Comment noted. SCAG recognizes the importance of tools like managed lanes/pricing and has developed a regional concept of operations to address some of the issues raised, including interoperability and benefits.</p>
0001449.04	<p>The publicly owned TCA-operated Toll Road network in Orange County is designed tointerrelate with transit service. The Toll Roads can accommodate Bus Rapid Transit andexpress bus service, and Toll Road medians are sized and reserved to provide the flexibility forfuture transit, if appropriate.</p>	<p>Thank you for your comment.</p>

ID	Comment	Response
<i>Submitted by</i>	Transportation Corridor Agencies	Submittal 0001449 Related Documents Link
0001449.05	<p>Priced facilities such as the Orange County Toll Roads are privately funded. This ensures that these facilities can relieve congestion and associated air pollution and GHG emissions on parallel freeways and major arterials without further stressing limited state, federal and local transportation funding resources. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing, which is beneficial to reduced criteria pollutants and GHG emissions reductions. The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.</p>	<p>Thank you for your comment. Suggested changes will be considered in the final Connect SoCal.</p>
0001449.06	<p>Page 73, Highways and Arterials Network The Connect SoCal Plan should include toll roads in the description of projects included in this category. 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. Recommended Clarification • Revise the text in the last sentence on page 73 to read, “Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes, and Express/HOT lanes. The complete list of projects can be found in the Project List Technical..” • Add the SR 241/91 Express Lanes (HOT) Connector project (FTIP ID ORA111207/RTP ID 2T01135) to Exhibit 3.2 Major Highway Projects, Table 3.2 Sample Highway Projects, and Exhibit 3.3 Planned Regional Express Lane Network. • The text under this section should discuss that all priced facilities in the SCAG region ensure inter-operability by using a common technology, FasTrak, to collect user fees. • The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities. • The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing which is beneficial to reduced criteria and GHG emissions reductions.</p>	<p>Comment noted. The exhibits and tables referenced are for illustrative purposes only. Please refer to the Final Project List Technical Report for a complete list of projects.</p>
0001449.07	<p>Page 66, Table 1: FTIP Projects, Project 10254 Recommended Clarification • In Table 1, we request that the completion date for Project 10254 be clarified as 2022, consistent with the discussions between TCA, OCTA and SCAG.</p>	<p>Comment noted. Orange County Transportation Authority has submitted the requested revision and it has been incorporated into the Connect SoCal Project List Technical Report.</p>
0001449.08	<p>Page 298, Table 3: Strategic Projects, RTP ID S2160011 Recommended Clarification TCA’s Project 10254 description (Route 73/ San Joaquin Hills Transportation Corridor) is correctly listed in Table 1 FTIP Projects; however, Table 3 Strategic Projects also lists specific components of this project (the SR 73/ Glenwood Interchange Improvement (Phase 2 & 3)) as a separate TCA project with a unique RTP ID number (S2160011). This reference and project should be removed as it is part of the parent Project 10254.</p>	<p>Comment noted. The Strategic project list is intended to capture future needs beyond 2045 without specific commitments. While SCAG concurs with the essence of the comment, we believe there is a value in holding a place in the plan for future improvement needs on the SR-73 corridor. As such, we will remove the reference to interchange improvement and revise the project description as 'Future Improvements on SR-73'.</p>
0001449.09	<p>Page 67, Table 1: FTIP Projects, Project ORA050, ORA051 and ORA0111207 Recommended Clarification • In Table 1, we request that the completion date for Projects ORA050, ORA051, and ORA111207 be clarified as 2022, consistent with the discussions between TCA, OCTA and SCAG.</p>	<p>Comment noted. Orange County Transportation Authority has submitted the requested revisions and those have been incorporated into the Connect SoCal Project List Technical Report.</p>

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<i>Submitted by</i>	Transportation Corridor Agencies	Submittal 0001449 Related Documents Link
0001449.10	Page 297, Table 3: Strategic Projects, RTP ID SORA052Recommended Clarification•In Table 3, we request that Project ORA052 be classified as a “State Highway” systemconsistent with the classification of the TCA Toll Road network.	Comment noted. The requested revisions have been incorporated into the Connect SoCal Table 3 Project List Technical Report.
0001449.11	Overall, TCA’s project descriptions in Table 1 FTIP Projects, for projects ORA050, ORA051, ORA111207, 10254 and Table 3 Strategic Projects, for project ORA052 are correctly listed, as of the current FTIP. However, for ORA050, ORA051 and 10254 TCA recently submitted to OCTA a revision to these projects showing that TCA has met its original TCM commitments for the TCA Corridors. The revised projects highlighting the TCA strategic projects have been submitted to SCAG for review.	Comment noted. For TCM timely implementation status of the three TCA projects ORA050, ORA051 and 10254, please refer to Transportation Conformity Analysis Technical Report, Table 65.
0001449.12	Page 2, Financial Plan, IntroductionThe draft document states that “Our region has successfully implemented toll systems in the past with the Transportation Corridor Agencies’ network of privately financed toll roads and express lanes along interstate 10, interstate 110 and State Route 91, including the most recent extension into Riverside County.” However, the statement needs to clarify the financial planning importance of privately funded toll facilities.Recommended ClarificationPriced transportation facilities also provide the opportunity for financial innovation. The Orange County toll roads (SR 73, SR 133, SR 241, and SR 261) utilize private funds. They provide congestion relief and associated air pollution and GHG emissions reduction without further stressing limited federal, state, and local transportation funding.	Thank you for your comment. Suggested changes will be considered in the final Connect SoCal.
0001449.13	Page 29, Highway TollsRecommended ClarificationUnder Highway Tolls Description we request the following revisions:“TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor Agency Agencies (SJHTCA), which oversees the San Joaquin Hills (State Route 73) Toll Road, and the Foothill/Eastern Transportation Corridor Agency Agencies (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) Toll Roads.”	We have updated the text to reflect your comment.
0001449.14	Page 8, Highway NetworksThe discussion on the coding of the region’s freeway system specifically mentions express lanes, toll lanes and HOT lanes, but not toll facilities such as existing Toll Roads SR 73, SR 241, SR 133 and SR 261 in Orange County.Recommended Clarification•Revise text under this section to include toll roads, “Include detailed coding of the region’sfreeway system (mixed-flow lane, auxiliary lane, HOV lane, HOT lane, toll lane, and trucklane, toll roads, etc.) as well as Express ways arterials, major and minor collectors.	Comment noted. The referenced text has been updated in the final Plan, to reflect this comment.
0001449.15	Page 20, Toll RoadsThe discussion on Toll Roads states that, “There were approximately 325 lane miles of toll roads in 2016, increasing to about 1,855 toll/HOT lanes in 2045. This includes a regional Express Lane network (TABLE 8) that would build upon the success of the 91 Express Lanes and Transportation Corridor Agencies (TCA) Toll Roads in Orange County and two demonstration projects in Los Angeles County.” However, none of the TCA operated Toll Roads are included in Table 8.Recommended Clarification•Table 8 should be retitled appropriately to include “Express Lane, HOT Lane and Toll RoadNetworks.” This change should also be made in the main RTP/SCS document.•TCA’s facilities should be added to Table 8 as tolled facilities and the effect of the tollcharges on these facilities should be incorporated into the highway assignment procedure.	Comment noted. The referenced text and table have been updated in the final Plan to address this comment.

ID	Comment	Response
<i>Submitted by</i>	Transportation Corridor Agencies	Submittal 0001449 Related Documents Link
0001449.16	TCA thanks you in anticipation of your written responses to these comments. We look forward to the amendments in the final 2020-2045 RTP/SCS and associated Draft PEIR to incorporate the recommended changes.	Thank you for your comments. For changes to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 10.0, Corrections and Additions, of the Final Connect SoCal PEIR.
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001355 Related Documents
0001355.01	I live in the San Gorgonio Pass area, about ½ hour from the Coachella Valley Active and Alternative Transportation Link (http://www.coachellavalleylink.com), and would like to see this route system extended to Redlands. This 45 mile extension would include the communities of North Palm Springs, Whitewater, Cabezon, Banning, Beaumont, Calimesa, San Timoteo Canyon, ending in Redlands. Given my proposal and the current active transit programs and funding via CALTRANS, what are SCAGs plans for expanding active and alternative transportation, including linkage, to the point that SCAG could achieve a 5 county alternative transportation route system. Can SCAG achieve separate funding for this, rather than being bundled in funding measures such as SB1. Thank you. Is SCAG looking into ways to design/build existing buses, and rail to better pick-up, carry, then drop-off cyclists and other alternative transit users, maybe like a “bus or train ferry”.	SCAG supports active transportation networks that connect across county lines, however SCAG does not directly fund or implement infrastructure projects in the region. Please direct this proposal to the appropriate implementing agency. Connect SoCal supports increasing connectivity, access, frequency and greater service hours with public transit. There are many transit providers in the SCAG region and any increase in transit service levels must go through the local transit provider planning and approval process, and requires securing funding for bus expansion vehicles and operations and maintenance.

ID	Comment	Response
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001355 Related Documents
0001355.02	<p>I'm pleased that efforts are underway by our local officials to develop the Coachella Valley-San Gorgonio Pass Rail Corridor Service (CVSGPRCS), including \$50 million in Federal Transit Funds. My first question, however, has to do with the route the rail service will take through the San Gorgonio Pass (SGP). The SGP poses a narrow and potentially very dangerous bottleneck, especially through Whitewater, Cabazon, and Banning. There was an infamous "Carmagedden" in 2012, that backed up local, regional, and transcontinental, vehicular traffic for up to 12 hours (and forced Ralph Lawler to move out of Palm Desert), that triggered the initial mitigation of 4 "turnaround gates" in the I10 median between Cabazon and Banning. Since the 2012 incident, and subsequently completed I10 gate installation by Caltrans, an I10Bypass project by Riverside County Transportation Department (https://rcprojects.org/i10bypass), has been proposed, without, in my opinion, consideration of the location and impact of a proposed CVSGPRCS rail station slated to be located at the Morongo Casino Resort & Spa (MCRS). I therefore believe the currently proposed route of the proposed I10 bypass, is a poor choice. I've advocated for an Alternative Route 7 from early EIR studies that traverses between Banning and MCRS along and adjacent to the northern boundary of the I10 freeway along this roughly 3 mile stretch. Please consider alternative 7 and connect this to the future MCRS rail station. Also I've advocated for the extension of Coachella Valley Link active and alternative transportation route (http://www.coachellavalleylink.com) from North Palm Springs through this bottleneck area (again between Whitewater Banning) along its eventual path to Redlands via Banning, Beaumont, Calimesa, San Timoteo Canyon Rd. I'm requesting that SCAG provide planning, design and funding for this active transportation link (I'm calling it San Gorgonio Pass Link), including the ability for Pass Link users to board the CVSGPRCS rail station at MCRS AND transit bus stops at MCRS. So, for the above bottleneck area, we are looking at: - the inclusion of an Alternative Route 7 from I10 Bypass Project - CVSGPRCS rail station at MCRS - Pass Link active and alternative transportation route, with boarding capabilities to CVSGPRC and transit bus stops at MCRS There are tremendous health, economic, tourism, air quality benefits from this proposal. Also would like a CVSGPRC station in San Timoteo Canyon.</p>	<p>The Riverside County Transportation Commission (RCTC) is the lead agency studying the feasibility and costs of a passenger rail service from downtown Los Angeles to Palm Springs and Indio. Currently, RCTC is preparing a draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) analyzing potential route alignments and their environmental impacts and costs and benefits. Comments regarding project alternatives should be directed to RCTC.</p>

ID	Comment	Response
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001355 Related Documents
0001355.03	<p>Requesting non-stop "direct-connect" airport public transit bus shuttle service from Beaumont (city hall or Beaumont Walmart) to both Ontario Airport and Palm Springs International Airport via Pass Transit buses. This means a Pass-area resident would board a Pass Transit bus and take it from Beaumont via I10 non-stop to Ontario Airport Terminals, with a separate route between Beaumont. I'd call it "Pass Transit Airport Link". In my opinion, this has much potential. I see solid ridership from users who use these airports for business and leisure. This fills a void created by the departure of Super Shuttle, and can provide shuttle service at a much lower price (say \$10-\$20 round trip for " vs. over \$200 round trip for Super Shuttle/prime-time shuttle), which is more convenient than autos or fixed route transit. For example Airport link could match commute times of auto. Savings can be had not only from the lower transit fares, but also commuters will save significantly by avoiding onerous parking fees at the airport parking lots. Also avoids need to use up land and dollars for additional parking lots at the airports. It would be especially important to have these shuttles arrive at the airports before the earliest boarding times.</p> <p>Hopefully HOV/toll lanes under consideration in the IE would allow for Pass Transit Airport Link buses to use these lanes.</p>	<p>Connect SoCal supports increasing multimodal access to the region's airports, and proposals for increased transit service must be evaluated by the local transit provider and in coordination with the county transportation commission to determine the best use of available resources. In addition to fly-away type bus service, other potential solutions could involve on-demand services that may be more cost-effective. SCAG will continue to work with its transportation agency partners in evaluating airport ground access options.</p>
0001355.04	<p>Advocating for separate funding sources for Active and Alternative Transit Routes and route systems. Currently, active transit (administered by Caltrans) appears to be bundled into transit measures such as SB1 where the money expenditures are dominated by highway repair and expansion projects. Although highway repairs, and future HOVs are necessary, billions of SB1 dollars are allocated to expand single passenger vehicle travel, which only reinforces and expands detrimental single passenger vehicular use, in terms of pollution, congestion, and wasteful land use. Requesting that SCAG, via legislation or via a ballot measure create a unique and separate funding source for Active and Alternative Transportation for the SCAG service area.</p>	<p>SB 1 (Road Repair and Accountability Act of 2017) raises significant funding for transit agencies and bike and pedestrian projects in addition to roadway preservation needs. SB 1 also dedicates funding for local planning and transportation projects including active transportation.</p>
0001355.05	<p>Request that SCAG develop funding for the design, manufacture and distribution of Transit Buses and Rail Cars that can support Active Transit users (cyclists, scooters etc.). I suggest SCAG look at bicycle "ferry" buses and rail cars that can support, and allow boarding/offloading of large number of cyclists (25 or more bicycles per bus or rail car?).</p>	<p>Connect SoCal supports increasing facilities and programs for Active Transportation modes including bicycles and scooters and on rail and transit vehicles. SCAG does not possess or direct funds that can be used for vehicle design and manufacture. Rail and transit vehicles are acquired from vehicle manufacturers by passenger rail and transit operators such as the Southern California Regional Rail Authority (Metrolink) and Omnitrans.</p>

ID	Comment	Response
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001355 Related Documents
0001355.06	<p>Please add Micro-Transit as a Planning Category for the Transportation Plan. Also, First-and-Last-Mile is a particularly troublesome gap in service in the San Gorgonio Pass Area where I live. Our area is very spread out. A trip to a local store, retail areas, or city hall are at least 6 miles away (although we are getting some more retail nearby). We've been looking at LA Metro's Micro-transit and GOMONROVIA as very promising solutions for the first-and-last mile problem. In my opinion, the lack of first-and-last-mile in our Pass area is, by far, the single biggest reason why our residents don't use public transit. People don't want to park at "park-and-rides" at a retail center or next to the freeway, only to have their vehicles vandalized, broken into, or stolen. They want doorstep service to the nearest transit station. Maybe a park-and-ride lot deeply embedded within our specific plan (residential neighborhood) area (such as a vacant lot at the entrance of Morongo Golf Club) with state of the art security might be considered. But in my opinion, doorstep-to-transit stop, first-and-last mile service is far-and-away the best option. It can be achieved by transit buses, vans, or subsidized on-demand services (Uber/Lift) such as in the GOMONROVIA program). On demand service is optimal.</p>	<p>A number of transit agencies in the region are piloting microtransit or similar services to provide first/last mile connections to fixed-route transit such as urban or commuter rail systems. SCAG will continue to monitor the best practices and lessons learned from these and other pilots around the country to help inform future planning for microtransit. While these types of services are often well-received, to date they are not proven to be highly productive and require large subsidies; more demonstration and research is needed. More discussion about microtransit is included in the Transit Technical Report.</p>
0001355.07	<p>Please fund a study which Active transit and alternative Transportation route through San Timoteo Canyon. Please provide funding for a "San Timoteo Link" or STLink alternative transportation route as part of an overall San Gorgonio Pass Link (see other comments). The ST Link of the Pass Link would traverse along Oak Valley Parkway then San Timoteo Canyon Rd. from I10/Desert Lawn Dr. in Beaumont through San Timoteo Canyon along San Timoteo Canyon Rd until the route reaches Barton Rd. in Redlands. This route includes, but is not limited to a class 1 bike-lane, and equestrian trail with access to local horse ranches, a hiking trail, and turnouts for trainspotters.</p>	<p>Comment noted. SCAG does not directly fund or implement infrastructure projects in the region. Please direct this proposal to the appropriate implementing agency.</p>
0001355.08	<p>Extend Pass Transit Route 120 into the Coachella Valley along I10 then Monterey Ave to College of the Desert. It's essential that this route has early start times that allow bus commuters to reach College of the Desert before their AM classes (for example 6:50am arrival time), and hourly or at-least semi-hourly service throughout the day with return trips to the Pass Area as late as a 10pm westbound time.</p>	<p>Connect SoCal supports increasing connectivity and destinations with public transit services. Pass Transit Route 120 is operated by Pass Transit and any extension of the route must go through the local transit provider planning and approval process, and requires securing funding for bus expansion vehicles and operations and maintenance.</p>
0001355.09	<p>Thank you for your consideration of my comments.</p>	<p>Comment noted. SCAG appreciates your comments.</p>

ID	Comment	Response
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001403 Related Documents
0001403.01	<p>Regarding Coachella Valley-San Gorgonio Pass Rail Corridor Service: CVSGPRCSI'm in favor of this service. However, there are a number of concerns regarding this service.</p> <p>1. Commercial Rail Right of Way dominating rail traffic: My understanding is that more than 45 commercial freight trains pass through San Timoteo Canyon each day. I presume this frequency extends from Route origin in Coachella Valley to Redlands area. Also these train lengths range from 1-3 miles long, along the mostly double sets of track and right-of-way. A consensus of Transportation Now (San Gorgonio Pass Chapter) members is that there's no way RCTC/SCAG can achieve reliable and frequent (hourly) passenger rail service, if it has to share the above right-of-ways. In my opinion, if RCTC/SCAG and related agencies attempt to run the passenger rail service along the Union Pacific Rail right-of-way, the agencies will need to purchase and own a separate right-of-way adjacent to or near the existing freight tracks and right-of-ways. OR:RCTC/SCAG and other agencies can consider purchasing and operating a passenger rail right-of-way, adjacent to, or along the I10 freeway as it traverses through the San Gorgonio Pass and into the Redlands Valley.</p> <p>I'm personally torn on this as my preference is for the separately owned passenger rail track right-of-way to run through San Timoteo Canyon as its more scenic, which opens up the opportunity for cultural/tourism stops in the Canyon. 2. Type of Passenger Rail Trains and Equipment:The existing locomotive/rail cars used in Metrolink Train System, may be outmoded in relation to more modern rail technologies. The obsolete, heavy tonnage, fossil fuel rail fleets currently used by METROLINK, should be phased out and replaced with more modern systems found in other countries ASAP. SCAG should look at the latest rail systems in Spain, France, Britain, Germany, Asia, and draw from these areas advancements in rail technology to develop the The CVSGPRCS, should be built using these more modern (more often high-speed rail) systems, which can provide safe minimum commuter speeds exceeding, for example, 100 mph. 3. Minimum speed time targets throughout the 6 county SCAG region:SCAG/RCTC should design and build regional passenger rail network which achieves a minimum time/speed standard. For CVSGPRCS for example:1 hour from Coachella Valley to LA Union Station (and visa versa): 30-45 minutes from San Bernardino to LA Union Station</p>	<p>The Riverside County Transportation Commission (RCTC) is the lead agency studying the feasibility and costs of a passenger rail service from downtown Los Angeles to Palm Springs and Indio. Currently, RCTC is preparing a draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) analyzing potential route alignments and their environmental impacts and costs and benefits.</p>
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001424 Related Documents
0001424.01.1	<p>Concern: USDA and California Conservation Easements are not being awarded to Hemet/San Jacinto Valley:Under the US Congress "Farm Bill" agricultural conservation easements are available to protect and preserve valuable and conveniently local farmland from development, by purchasing farmland rights through perpetuety. See: https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/easements/acep/</p> <p>In addition California Department of Conservation has a similar agricultural conservation easement program: https://www.conservation.ca.gov/dlrp/grant-programs/Pages/ACE_Overview.aspx</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001424 Related Documents
0001424.01.2	<p>In the Inland Empire, where I live, these conservation easements are administered by Federal and State "Resource Conservation Districts". For example the 2 districts pertinent to my area are the: - San Jacinto Basin Resource Conservation District (SJBRCDC): https://www.sjbrcd.org and the - Inland Empire Resource Conservation District (IERCD): https://www.iercd.orgIn a recent USDA Congressional Farm Bill: (https://www.farmers.gov/manage/farmbill or https://www.ers.usda.gov/agriculture-improvement-act-of-2018-highlights-and-implications/) Ag Conservation easement dollars were awarded in California as follows: - Central Valley: \$800 million dollars - Coachella Valley: \$300 million dollars - Hemet/San Jacinto Valleys: ZERO dollarsWhy did the Hemet/San Jacinto Valleys (which is under the jurisdiction of SJBRCDC) NOT receive a single penny?The reason I suspect, is lack of accountability due to a combination of neglect, indifference, and corruption.</p>	Comment noted.
0001424.01.3	<p>SCAG needs to set up a program targeting the abuses here, and which forces federal, state, and local officials, Farm Bureau Representatives (http://www.riversidecfb.com) to fund at least \$100 million dollars in conservation easement dollars to the Hemet/San Jacinto Valley.</p>	<p>SCAG recognizes the importance of conservation easements for preserving agricultural lands. The Natural and Farm Lands Technical Report identifies several state-led grant programs designed to support local agencies in their conservation efforts. For example, the Sustainable Agriculture Land Conservation (SALC) program helps cities and counties acquire conservation easements to prevent agricultural lands from being converted to more greenhouse gas intensive land uses.</p>
0001424.01.4	<p>The Hemet/San Jacinto Valley provides a critical agricultural resource to consumers in the region, serving as a hedge against price fluctuations out of the regions control. Already Stater Brothers partners with Batista Farms in Hemet with incredibly fresh winter produce. The growing "locavore" taxpayers, want their food grown and sold locally. For example, I would like to purchase all of my food within a 30 mile radius of my home. This can be achieved when Hemet/San Jacinto Valleys will FOR THE FIRST TIME EVER, receive their fair share of conservation easement \$\$\$.</p>	<p>SCAG recognizes the importance of conserving agricultural lands in Southern California for their environmental and economic benefits to the region. More information about Connect SoCal's agricultural conservation strategy can be found in the Natural & Farm Lands Conservation Technical Report.</p>
0001424.02.1	<p>More frequent express/commuter link bus service from the San Gorgonio Pass Communities to the Coachella Valley is needed: For residents of the San Gorgonio Pass Communities of Cabazon, Banning, Beaumont, Cherry Valley, Calimesa, and San Timoteo Canyon, the Coachella Valley provides relatively close access to resources such as jobs, recreation, tourism, entertainment, culture, shopping, and education. However, there's virtually no public transit options from the Pass Communities to the Coachella Valley. This includes AM hours when residents need to go to work, school etc, and throughout the day and evening hours.</p>	<p>Connect SoCal supports increasing connectivity and destinations with public transit services. Currently, Pass Transit Route 120 is operated by Pass Transit serving Beaumont and Banning with the Cabazon area. Any extension or service level increases of the route, or the establishment of new transit services, must go through the local transit provider planning and approval process, and requires securing funding for bus expansion vehicles and operations and maintenance.In addition the Riverside County Transportation Commission is studying the feasibility and costs of a passenger rail service from downtown Los Angeles to Palm Springs and Indio through the Pass communities.</p>
0001424.02.2	<p>After years of repeated public pressure, Sunline Transit relented and grudgingly added eastbound AM Sunline 220/210 which has a single AM stop at 9:24am at Beaumont Walmart arriving at Palm Desert Westside Pavillion at approx. 10:40am. It has a single return time in the afternoon, leaving Westfield Palm Desert at 3:20pm. Although this first step is appreciated, it's inadequate.</p>	<p>Connect SoCal supports increasing connectivity and destinations with public transit services. Implementation of new or increased service levels of public transit must go through the local transit provider planning and approval process, and requires securing funding for bus expansion vehicles as well as operations and maintenance.</p>

ID	Comment	Response
<i>Submitted by</i>	Transportation Now of San Gorgonio Pass	Submittal 0001424 Related Documents
0001424.02.3	<p>Recently Pass Transit Route 120 bus service, which is a robust and frequent commuter bus link dedicated to servicing the San Gorgonio Pass Area, was extended from Beaumont Walmart to Morongo Casino Resort and Spa (MCRS), a very positive addition. Given Pass Transit Route 120 has reached MCRS, this bus route is in an ideal position to extend its service into the Coachella Valley. Pass Transit Route 120 can run on an hourly basis, from Beaumont Walmart Transit Center, arriving at College of the Desert (COD) by 6:45 am or before the first AM classes at COD. Extended Pass Transit Route 120 can also run on an hourly basis throughout the day until 11pm between the Coachella Valley and the San Gorgonio Pass. Therefore please extend Beaumont Pass Transit Route 120 into the Coachella Valley, where the route can provide hourly Eastbound/Westbound service from the early AM hours until Late at night.</p>	<p>Connect SoCal supports increasing connectivity and destinations with public transit services. Pass Transit Route 120 is operated by Pass Transit and any extension of the route must go through the local transit provider planning and approval process, and requires securing funding for bus expansion vehicles as well as operations and maintenance.</p>
0001424.03	<p>I am requesting that SCAG and its partner agencies adopt the following performance measures: 1. Achieving 30-45 second per mile performance from its commuter rail and bus lines such as San Bernardino Line to LA Union Station, and regional bus routes. Thus for example, a commuter boarding the San Bernardino Line at San Bernardino Transit Center, should arrive at LA Union Station within 30-45 minutes. 2. To increase ridership, which is arguably the central performance measure of transit success, adopt micro transit or other "first-and-last" mile programs throughout the 6 county region, including the San Gorgonio Pass Communities. First-and-last mile is arguably the most critical gap in transit service access that must be added. 3. Also to increase ridership, have the partner agencies of SCAG and Southern California Regional Rail Authority, fully subsidize (100% subsidy) all Metrolink train routes. According to my calculations this should cost the Southern California Regional Rail Authority participating governments no more than \$250 million dollars, which considering the 15+ million residents in the Metrolink Train Service Area, is a very small sum, given the population.</p>	<p>We are in agreement with your assertion that ridership is an important variable in the performance assessment of our regional transit system. SCAG has been working with our local jurisdictions and regional transit operators on the development and implementation of a variety of programs and strategies to encourage transit use throughout the region, including micro-mobility, shared mobility, and first/last mile connectivity options. Please see the Final Transit Technical Report for more detailed information regarding these and other transit enhancement strategies.</p>
<i>Submitted by</i>	UNITE HERE Local 11	Submittal 0001448 Related Documents Link
0001448.01	<p>UNITE HERE Local11 hereby provides these comments on the draft Program Environmental Impact Report ("PEIR") for the draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy plan ("Plan" or "2020 RTP/SCS"), by the Southern California Association of Governments ("SCAG") under the California Environmental Quality Act, Pub. Res. Code § 21000 et seq. ("CEQA"). Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix, Arizona. Members of Local 11, including hundreds who live or work in the SCAG region, join together to fight for improved living standards and working conditions. Local 11's members have a direct interest in seeing that the State's environmental/planning laws are being followed and that new development and regional planning efforts do not contribute to the climate-change crisis that threatens a loveable future in Southern California for them and their children.</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	UNITE HERE Local 11	Submittal 0001448 Related Documents Link
0001448.02	<p>Here, one of the fundamental objectives of the 2020 RTP/SCS and PEIR is to provide specific strategies, policies, performance standards, and other provisions that will reduce greenhouse gas ("GHG") emissions pursuant to Senate Bill 375 ("SB 375"). To this end, Local 11 provides the following questions and requests for information about the Plan's specific GHG strategies that need to be included in a recirculated or final PEIR. A. Under the Plan, GHG per capita emissions from automobile and light-duty vehicles ("LOA") are anticipated to drop from 23.8 lbs/day (2005) to 21.3 lbs/day in 2020, and further reduced to 18.8 lbs/day in 2035 (see PEIR, Tbl. 3.8-1 0). Please clarify the following: 1. How were these targets developed, what data was used, and what are the exact underlying calculations? What are the specific data and targets for each city and county within the SCAG region? 2. Are these targets for all project types or specific project types (e.g., residential, office, retail, hotel, mixed-use, etc.)? 3. Is the capita merely residents, residents+ employees, or something else? 4. What is the trajectory of these GHG reductions over the duration of the Plan? Are there specific targets during the interim years between 2020-2035, or merely a straight-line negative compound annual growth rate? 5. Why are 2005 baseline emissions calculated based on EMFAC2007, but 2020 and 2035 levels based on EMFAC2014?</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001448.03	<p>B. Under the Plan, per capita Vehicles Miles Traveled ("VMT") from LDAs and all vehicles are to be reduced from 22.09 VMT and 23.79 in 2009 (respectively) to 20.67 and 22.89 in 2045 (respectively) (see PEIR, Tbl. 3.8-11). Please clarify the following: 1. How were these VMT targets developed, what data was used, and what were the exact calculations? What are the specific data and VMT targets for each city and county within the SCAG region? 2. Are these VMT targets for all project types or specific project types (e.g., residential, office, retail, hotel, mixed-use, etc.)? 3. What is the trajectory of these VMT reductions? Are there specific targets during the interim years between 2020-2035, or merely a straight-line negative compound annual growth rate? 4. Clarify whether these VMTs are from just the residential population or also employees? 5. What data/metrics are specific to employee trips? 6. What are the VMT projections for the residential and employee populations, as well as the disaggregated data for the various cities and counties within the SCAG region?</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001448.04	<p>C. Under the Plan, various Plan goals are tied to key specific performance standards (see Plan, Performance Measures Report, Tbls. 1, 2, 4, 20). However, many of the standards are not made clear and require clarity, including: 1. For Outcome 1 (1) (id. pp. 15-16), what is the disaggregated data (e.g., what are the household/employment figures for each city and county within the SCAG region in 2016 and 2045 under both "Baseline scenario" and under the Plan scenario)? 2. For Outcome 1(4) (id. p.16), what is the disaggregated data (e.g., 2016 base year and Connect SoCal VMT levels for each city, and what is the interim targets between those years)? 3. For Outcome 1 (5) through (7) and Outcome 2 (1) through (6) (id. pp. 18-28), what is the disaggregated data (e.g., counties and cities), how were these calculated/modeled, and how are projects able to demonstrate consistency with these performance metrics? 4. For all performance measures under Location Efficiency and Safety and Public Health (id. at pp. 56-58 [Tbl. 20]), what is the disaggregated data (e.g., counties and cities), how were these calculated/modeled, and how are projects able to demonstrate consistency with these performance metrics?</p>	<p>Thank you for your comments. In response to your inquiry regarding the performance measures, the results are obtained through use of the SCAG Travel Demand Model, which takes into account specifically defined sets of parameters corresponding to each scenario being evaluated. For example, the results for the year 2045 obtained for the Connect SoCal scenario assume all of the projects, plans, and strategies promoted through the 2020 RTP/SCS are fully implemented. Since the model output is intended to assess performance over the entire SCAG region, the results presented in Connect SoCal are typically aggregated at the regional level rather than at the city or county level. Additionally, since the objective of the performance measures is to assess progress between base year conditions (2016) and expected future conditions at the horizon year (2045), those are the standard years used for performance comparison.</p>

ID	Comment	Response
<p><i>Submitted by</i> UNITE HERE Local 11 <i>Submittal</i> 0001448 Related Documents Link</p>		
0001448.05	<p>D. Under the Plan, four measures are listed as SCAG mitigation measures (e.g., SCAG "shall continue to work with" local agencies to adopt Climate Action Plans ("CAP{s}"), "shall encourage energy efficient design" through strengthening local building codes, "shall continue working with partners" to support deployment of electric vehicle ("EV") charging stations, "shall continue to pursue partnerships" to promote energy-efficient development) (see PEIR, p. 3.8-68). Please clarify the following:1. What exactly do "work" or "encourage" or "working with" or "pursue" mean, and are these enforceable performance standards as CEQA requires?2. What specifically is required to satisfy these vague mitigation measures?3. What specific criteria can one objectively look at to determine compliance with these mitigation measures?4. What specific performance-based criteria apply to these non-specific mitigation measures?5. Why is there no consideration of specific actions listed (e.g., work with local agencies to develop CAPs that meet specific GHG reduction targets, or encourage local building code updates that require mandatory Cal Green Tier 1 or Tier 2 standards, or work with partners/agencies to support specific percentage of code-required parking to be EV-immediatecharging, etc.)?6. What other SCAG-related mitigation was considered and found infeasible?</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001448.06	<p>E. Under the Plan's Sustainable Communities Strategy Report, Appendix 1 (i.e., SPM Place Types), no mention is given as to hotel project types. Please explain how hotels are accounted for in the Plan, also the assumptions, intensification, traffic generation, GHG generation, and other relevant data specific to hotel uses/projects.</p>	<p>In the Appendix 1 of the Sustainable Communities Strategy Technical Report (SPM Place Types), hotels are embedded as a building type within the relevant place types, such as High Intensity Activity Center among many others. In regards to how hotels are accounted for in the plan, SCAG staff developed the number of jobs by 13 main industries as model input, including combined industries for Arts, Entertainment, and Recreation (North American Industry Classification System (NAICS) 71) and for Accommodation and Food Services (NAICS 72). SCAG Regional Travel Demand uses the number of jobs by main industries to estimate traffic generation, not by detailed data such as Hotels (NAICS 721110). As a sub-industry of Traveler Accommodation industry, traffic impact made by Hotels (NAICS 721110) is indirectly estimated.</p>
0001448.07	<p>Local 11 appreciates the opportunity to provide these comments to SCAG, and looks forward to a detailed response item by item with all requested supporting data. Please also provide us with all notices of CEQA actions or public hearings on the Plan/PEIR.</p>	<p>Your email address has been added to the Connect SoCal email distribution lists for future notices. For responses related to the Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<p><i>Submitted by</i> United States Environmental Protection Agency <i>Submittal</i> 0001464 Related Documents Link</p>		
0001464.01	<p>The U.S. Environmental Protection Agency has reviewed the Southern California Association of Governments Connect SoCal 2020-2045 Draft Regional Transportation Plan/Sustainable Communities Strategy and Draft Programmatic Environmental Impact Report. The EPA supports SCAG's goals of incorporating environmental and community considerations in the regional transportation planning process. Early integration of comments from regulatory and resource agencies can result in greater opportunities to reduce environmental and public health impacts associated with future transportation projects. The EPA provides the below feedback following our limited review of plan elements related to goods movement, environmental justice, and air quality.</p>	<p>Thank you for your comments. Comments noted. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	United States Environmental Protection Agency	Submittal 0001464 Related Documents Link
0001464.02	<p>Goods Movement Consistent with previous SCAG RTPs, Connect SoCal emphasizes the need to deploy zero and near-zero emission technologies, with the ultimate goal of transitioning to ZE technologies, in order to reduce air quality impacts from the region's freight system. It also highlights the importance of providing necessary supportive infrastructure and considering lifecycle impacts associated with these technologies. Pages 60-67 of the Goods Movement Technical Report describe numerous local, state, and federal initiatives to advance clean freight technologies, such as the California Sustainable Freight Action Plan, the South Coast Air Quality Management District's proposed Facility-Based Mobile Source Measures, and the San Pedro Bay Ports' 2017 Clean Air Action Plan Update. Specific roles identified for SCAG and partner entities, described on pages 68-69, include convening stakeholders to discuss battery manufacturing and disposal, coordinating with partners to include charging and fueling infrastructure in regional projects, and securing funding for technology evaluation and demonstration. The EPA strongly supports the efforts to transition to a ZE/NZE goods movement network described in the RTP. Such efforts will be critical to reducing public health impacts associated with ambient air pollution and assisting the South Coast Air Basin in attaining National Ambient Air Quality Standards. Recommendation: Consider incorporating robust ZE/NZE deployment strategies in any planned freight-related capacity-enhancing projects, particularly those that would be located near sensitive receptors and/or in heavily burdened communities.</p>	<p>SCAG recommends that zero emissions (ZE) and near zero emissions (NZE) strategies are considered in freight capacity enhancing projects to the extent allowable. SCAG recommends that all projects consider opportunities for ZE and NZE technology deployment, in particular in designing space for fueling/charging. As vehicles are independently owned and operated, vehicle deployment is not necessarily under the jurisdiction of the agency designing and building the project.</p>
0001464.03	<p>The Environmental Justice Technical Report examines 18 performance indicators within four geographic scopes to thoroughly evaluate the RTP's impact on EJ populations. The performance indicators are conveyed through four broader groups: impacts to quality of life, health and safety, commute, and transportation costs. Geographic scopes include the SCAG region, EJ Areas, Senate Bill 535 Disadvantaged Communities, and Communities of Concern. The report utilizes an array of data visualization methods, including maps that identify areas that have undergone significant changes over the years in relation to EJ communities and tables that convey how wildfire and flood risk vary by race and economic status. The findings of the report indicate that, for many performance indicators, the RTP would improve conditions for low-income and/or minority populations; however, it would also result in some disproportionate impacts to EJ communities, such as increases in emissions, noise, and rail impacts in certain areas. The EJ Toolbox included on pages 167-177 offers potential measures to address impacts to low-income and/or minority communities for various impact areas, including air quality, climate vulnerability, and noise. Recommendation: Consider including the SCAG EJ Toolbox as a suggested resource in relevant project-level mitigation measures in the Final PEIR.</p>	<p>Comment noted. Additionally, please refer to Chapter 9.0, Responses to Comments of the Final PEIR.</p>

ID	Comment	Response
<i>Submitted by</i>	United States Environmental Protection Agency	Submittal 0001464 Related Documents Link
0001464.04	<p>The RTP incorporates three congestion pricing strategies, including the development and expansion of express lane networks, a proposal to establish a mileage-based user fee, and the use of Cordon/Area Pricing. As explained in the Environmental Justice Technical Report, the introduction of a mileage-based user fee could alleviate some disproportionate burden on low-income drivers because “it allows lower income households to pay the same price per mile as other groups, whereas the gasoline tax does not”; however, the report also acknowledges that a user-based fee would nonetheless be regressive in nature, as such fees would comprise a larger percentage of lower-income drivers’ incomes than for drivers of higher income groups (p. 165). Recommendations:</p> <ul style="list-style-type: none"> • Consider including a discussion of potential methods to address any disproportionate impacts to low income drivers that could result from the proposed congestion pricing programs (e.g., subsidizing the purchase of required transponders, waiving monthly maintenance fees, allowing the use of cash to open and replenish toll accounts, etc). • Include a detailed description of any equity assessments that have been completed for existing congestion pricing programs in the region. Describe the key findings of each study and any approaches taken to reduce disproportionate impacts to low-income motorists. • Encourage partner agencies to conduct equity assessments for planned congestion pricing programs. 	<p>Comment noted. It is correct that a user-based fee would nonetheless be regressive in nature, and would comprise a larger percentage of lower-income drivers’ incomes than for drivers of higher income groups. However, a user-based fee would be comparatively less regressive than a gas tax due to car ownership and travel behavior patterns of various income groups. Discussion of potential methods to address disproportionate impacts to low-income drivers may be found in the Transportation Finance Technical Report. For Cordon/Area Pricing, SCAG is currently conducting a series of studies that would address equity assessments for congestion pricing programs in the region. Partner agencies are pursuing similar equity-focused outreach and assessments for possible future congestion pricing programs.</p>
0001464.05	<p>Air Quality Mitigation Measures The mitigation measures included in the Connect SoCal PER are classified into two types: those that SCAG would commit to implement, and those that would be considered by implementing agencies during project-level planning. The EPA supports SCAG Mitigation Measures Air Quality-2 and AQ-3, which confirm SCAG’s continued commitment to evaluate public health outcomes through the transportation planning process, specifically through the Public Health Working Group, and to analyze air quality impacts, particularly in vulnerable communities, such as near-roadway communities. The EPA also supports SCAG’s interest in improving active transportation in disadvantaged communities as indicated in SMM-AQ- 1. We suggest elaborating on this program in the Final PEW. Recommendation: Provide additional details about the proposed Southern California Disadvantaged Communities Planning Initiative described in SMM AQ- 1, including the entities that would participate in the initiative, potential eligibility criteria for applicants, and the community engagement strategy that would be employed. Project MM-AQ- 1 describes an array of emissions controls that lead agencies would consider in order to reduce construction-related emissions, including fugitive dust controls, idling restrictions, and the use of Tier 4 equipment in projects within 500 feet of certain sensitive land uses. Recommendations:</p> <ul style="list-style-type: none"> • Consider incorporating a goal to minimize community impacts in PMM-AQ- 1(o). • Consider encouraging the use of ZEINZE technologies, where feasible and appropriate, in PMM-AQ- 1(q). 	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>

ID	Comment	Response
<p><i>Submitted by</i> United States Environmental Protection Agency Submittal 0001464 Related Documents Link</p>		
0001464.06	<p>Greenhouse Gas Mitigation Measures We support the robust set of mitigation measures to address greenhouse gas emissions listed on pages 3.8-68 - 3.8-72, many of which would yield the co-benefit of reducing criteria pollutant emissions. Project-level measures for consideration include the incorporation of green building features (e.g., energy-efficient construction materials, installation of energy-efficient lighting systems, use of highly reflectivity building materials), the use of Best Available Control Technologies during construction (e.g., lighter-colored pavement, planting of shade trees, deployment of ZE/NZE technologies), and measures to encourage bicycle and public transit use. Recommendation: Encourage the consideration of measures included in PMM-GHG-1 in environmental justice communities.</p>	<p>Comment noted. SCAG staff will include the GHG mitigation measures in the EJ Toolbox of the EJ Technical Report. However, please note that the EJ Toolbox is advisory and includes recommended practices and approaches local jurisdictions and EJ stakeholders may potentially use to combat EJ-related impacts. The EJ Toolbox will also be a dynamic document that changes with the most recent and relevant best practices and approaches as they become available. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001464.07	<p>The EPA appreciates the opportunity to provide feedback for consideration during the regional transportation planning process. We hope this feedback will lead to improved environmental and public health outcomes. Please send a copy of the Final RTP/SCS and PEIR when they become available to this office at the address above (mail code TW-2).</p>	<p>Thank you for your comments. Your email address has been added to the Connect SoCal email distribution list for future notices. A hard copy of the Final Connect SoCal will be shared when available. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<p><i>Submitted by</i> Ventura County Air Pollution Control District Submittal 0001432 Related Documents Link</p>		
0001432.01.1	<p>1. Pg 4, 2nd Paragraph: The Ventura County Air Pollution Control District Conformity SIP submittal was withdrawn through an agreement to resolve U.S. EPA's SIP backlog. The VCAPCD is awaiting guidance to develop and re-submit a conformity SIP submittal.</p>	<p>Comment noted.</p>
0001432.01.2	<p>2. Pg 6, 1st Bullet: Budgets are from the 2008 early progress plan that was submitted for the 1997 8-hour ozone NAAQS. EPA proposed final approval of the 2016 ozone SIP on December 20, 2019 (84 FR 70109).</p>	<p>Comment noted. The referenced two bullets under "Ventura County Portion of SCCAB" will be updated to reflect up-to-date EPA action.</p>
0001432.01.3	<p>3. Pg 7 2007 Ozone SIP: To clarify, the TCMs in the 1995 1-hr ozone SIP remains the applicable TCMs except for TCM G –Employee Commute Options (ECO) which was repealed due to the federal and state mandates that prohibited ECO. The 2007 VC Air Quality Management Plan made changes to the TCM categories by updating and removing TCM G – Employee Commute Options.</p>	<p>Comment noted. The first paragraph under "2007 Ozone SIP (VENTURA COUNTY PORTION OF SCCAB)" will be updated to reflect the clarifications.</p>
0001432.01.4	<p>4. Pg 28, 1st paragraph: VCAPCD concurs with the statement that preceding budgets will be superseded by budgets in the next SIP approval. U.S. EPA proposed final approval of the Ventura County 2016 SIP on Dec. 20, 2019 (84 FR 70109).</p>	<p>Comments noted.</p>
0001432.01.5	<p>5. Pgs 42-43: References to "implementation plan" should be replaced with state implementation plan or SIP. Implementation plan is too general and not specific to what is plan is being referenced.</p>	<p>Comments noted. References to "implementation plan" are part of excerpts of the U.S. Environmental Protection Agency (EPA) Transportation Conformity Regulations and thus should not be altered.</p>
0001432.01.6	<p>6. Pg 44, 2007 Ozone SIP SCCAB: Suggestion to remove the last paragraph under this heading and move to the section heading called Applicable SIPs in the SCAG Region on page 43.</p>	<p>Comment noted. Changes will be reflected in the Final Connect SoCal.</p>

ID	Comment	Response
<p><i>Submitted by</i> Ventura County Planning Division Submittal 0001562 Related Documents Link</p>		
0001562.01	<p>On January 28, 2016, and February 22, 2019, the Long Range Planning Section submitted comment letters to SCAG in response to Draft RTP/SCS and environmental documents. These letters provided detailed background emphasizing the need for regional cooperation for the construction of these improvements. As such, we respectfully request that the restriping and any other critical intersection improvements in the Saticoy area be included in the RTP/SCS or FTIP Projects list as necessary, to make this a priority project.</p>	<p>SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan. We urge that you work with VCTC to identify your project priorities for inclusion in future RTP/SCS and/or FTIP amendments, for submittal to SCAG through VCTC.</p>
<p><i>Submitted by</i> Ventura County Transportation Commission Submittal 0001300 Related Documents</p>		
0001300.01	<p>The schedule for project #5160005, Route 101 improvements in Ventura County, has been revised to delay the project. The completion date is now 2040.</p>	<p>Comment noted. Project 5160005 reflected a completion year of 2040 in the Draft Connect SoCal Project List Technical Report.</p>
<p><i>Submitted by</i> Ventura County Transportation Commission Submittal 0001368 Related Documents Link</p>		
0001368.01	<p>Exhibit 2.2 does not use the most recent bike GIS data for Ventura County, which was provided to SCAG in 2019. The most recent bike data is from 2018, where the plan base year is 2016; however, the 2018 bike survey included many corrections to the previous data used in the VCTC paper maps.</p>	<p>The Ventura County bikeway map information will be corrected.</p>
0001368.02	<p>The map depicts one Airport located in Ventura County, shown at the site of the airfield at Naval Base Ventura County-Point Mugu. The map depicts this and other Government/Military Airports using the same icon as Commercial Airports, such as LAX and BUR. The map should use an icon (perhaps a different color) to differentiate Government/Military Airports from Commercial Airports to avoid public confusion. Also, the map does not depict two public use airports (Camarillo and Oxnard) located within Ventura County. The text should make clear why such facilities, which are used for movement of goods and passengers, are not included in the RTP/SCS.</p>	<p>Comment noted. Exhibit 2.4 “Goods Movement System” in Chapter 2 is intended to illustrate the airports and seaports where cargo and freight are transported to and from the SCAG region. Exhibit 2.4 in Chapter 2 is not intended to be a comprehensive map of airports in the region. However, the other airports within the SCAG region are described and/or listed in the Aviation and Airport Ground Access Technical Report. Exhibit 1 “SCAG Region Airports” in the Aviation and Airport Ground Access Technical Report features the “commercial service airports” and select reliever airports within the SCAG region. The “commercial service airports” (i.e. airports with scheduled passenger service) are noted on Exhibit 1 with a black airplane symbol, while the select “reliever airports” are noted with a red airplane symbol. Exhibit 1 in the Aviation and Airport Ground Access Technical Report is not intended to be a comprehensive inventory of all of the airports within the SCAG region, as there is text and several tables designed to describe and list the commercial service, general aviation and reliever, and other public-use airports, within the SCAG region. The section “Commercial Service Airports in the SCAG Region (FAA Code)” describes the seven commercial service, with scheduled passenger service, airports in the region. Table 3, “General Aviation and Reliever Airports in the SCAG Region” lists the general aviation and reliever airports, along with FAA airport code, within the region. Finally, Table 4, “Other Public-Use Airports in SCAG Region”, lists other public-use airports, along with FAA airport code, within the SCAG region.</p>

ID	Comment	Response
<i>Submitted by</i>	Ventura County Transportation Commission	Submittal 0001368 Related Documents Link
0001368.03	Page 32, Section Natural Lands. The text states: "A range of local conservation plans, habitat conservation agencies and state/federal park designated areas provide protection for a significant amount of natural and farmland in the SCAG region. However, most of these protected lands are in remote desert areas far from incorporated areas (EXHIBIT 2.6). Therefore, a substantial amount of land on the urban and suburban fringe is vulnerable to development." This is largely untrue for Ventura County, which has an extensive system of protections for agriculture and open space lands, including the Save Open Space and Agricultural Resources (SOAR) Ordinances, Guidelines for Orderly Development, Greenbelt Agreements, and continued use of Williamson Act / Land Conservation Act contracts despite the loss of State subvention payments to Counties.	Comment noted. SCAG applauds the County of Ventura's many agricultural and open space protections, and acknowledges the Save Open Space and Agricultural Resources (SOAR) and the Habitat Connectivity and Wildlife Corridor Ordinance in the Natural & Farm Lands Technical Report as examples for the rest of the region. Referenced text has been clarified.
0001368.04	Exhibit 2.5. For Ventura County, the figure appears to overstate the amount of agricultural lands. The land use designation appears to include grazing lands within the area denoted as Agriculture, which would more appropriately be categorized as Open Space.	Exhibit 2.5 reflects land use designations supplied by jurisdictions through the bottom-up Local Input and Envisioning Process. Additionally, grazing lands are classified as Agriculture to ensure consistency with the California Department of Conservation's Farmland Mapping and Monitoring Program data.
0001368.05	Table 2.4 notes that Ventura County has seen a 10% decrease on farmland between 1984 and 2016. It is important to note, however, that the aforementioned SOAR Ordinances were approved by voters in 1996, and reauthorized in 2016 to extend through 2050.	Comment noted.
0001368.06	Page 40, 2nd Column, 2nd Paragraph. The text points out that most of the Top 100 bottlenecks are located in Los Angeles County, with some located in Orange, Riverside, and San Bernadino Counties. It would be helpful to also note those counties that do not have any of the Top 100 bottlenecks (Ventura and Imperial).	Comment noted. Suggestions will be considered in the Final Connect SoCal.
0001368.07	Page 41, Section "Funding the Transportation System" - 1st Column, 3rd Paragraph. The text points out that 61% of the region's core transportation revenues come from local sources, and eight sales tax measures have been adopted to shift "the burden of raising tax dollars" to local agencies. It should also be noted here that one county (Ventura) does not have a sales tax measure to generate local transportation funding resources. The plan should address the impact to transportation funding for local agencies without local revenue sources for transportation.	Comment noted.
0001368.08	Page 49, Section "Support Implementation of Sustainability Policies" - Strategies should recognize the role of the public in implementing the SCS. Consider including a strategy to raise public awareness and understanding of sustainability principles through outreach and education efforts to build support for implementation of the SCS.	Comment noted. SCAG will work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.
0001368.09	Page 54, Section "Spheres of Influence" - 2nd Column, 1st full paragraph. The text notes that as a result of the SCS strategy to prioritize growth within existing Spheres of Influence, five percent of the region's future household growth will occur within SOIs from 2016 to 2045. Clarify whether this figure reflects household growth within the existing SOI but outside of existing city limits, or is inclusive of growth within existing city limits as well.	Comment noted. Future household growth within the region's established Spheres of Influence geography is not inclusive of future growth within existing city limits.
0001368.10	Page 55, Section "Greenbelts & Community Separators" - Perhaps include some acknowledgement of other policy approaches to directing urban growth, such as Guidelines for Orderly Development, SOAR ordinances, and urban growth boundaries.	Comment noted. Other policy approaches, including SOAR, are described in the Natural & Farm Lands Conservation Technical Report.

ID	Comment	Response
<i>Submitted by</i>	Ventura County Transportation Commission	Submittal 0001368 Related Documents Link
0001368.11	Table 3.1 - What were the selection criteria for inclusion of projects in this list of "Selected Transit Capital Projects"? Note that none of the selected projects are in Ventura or Imperial Counties.	The transit and rail projects highlighted in Table 3.1 are a sample of key rail and bus rapid transit (BRT) projects in the SCAG region that generally require capital improvements for infrastructure, and which are in Connect SoCal's financially-constrained plan. At this time, there are no major rail or BRT projects in Ventura or Imperial Counties.
0001368.12	Page 78, Section "Goods Movement" - 1st Column, 2nd Paragraph. Refers to a "regional visor that maintains economic competitiveness..." Presumably "visor" should be "vision."	The referenced correction is reflected in the Final Connect SoCal.
0001368.13	Page 82, Section "Effective Analysis & Planning" - 1st Column, 1st Paragraph. Refers to a "discursive and collaborative planning approach." Perhaps "discursive" is not the best word choice here? Discursive means "moving from topic to topic without order," which is generally not the best approach to planning. Suggest use of "comprehensive" or other word choice.	Comment noted. Suggestions have been addressed in the Final Connect SoCal.
0001368.14	Page 89, Exhibit 3.6 - Job Centers are highlighted in Ventura and Camarillo, with a small center in coastal Oxnard-Port Hueneme, but no Job Center highlighted for Oxnard downtown/U.S. 101, which is surprising considering that Oxnard is the largest city in Ventura County. Suggest SCAG to review this data and map generation.	Since job centers in Southern California can vary in both size and density, it is difficult to develop consistent definitions. For Connect SoCal, staff used a data-driven approach to develop this layer. Job centers are defined based on local peaks in employment density, following a methodology which was described in more detail at SCAG's April 2019 Technical Working Group meeting. The methodology follows a technique developed by researchers at the University of California, Irvine's Metropolitan Futures Initiative. While the core area of Oxnard is an area of significant employment, smaller yet more dense centers nearby including Ventura, Oxnard/Port Hueneme, and Camarillo likely preclude its identification as a job center using this methodology.
0001368.15	Page 91, Exhibit 3.8 - A "Priority Growth Area - High Quality Transit Area" is depicted for the area that extends from south Oxnard through Ventura, presumably along the Gold Coast Transit District Route #6. While this route may meet the definition of a high quality transit corridor with headways of 15 minutes or better by 2045, its inclusion in the RTP as an HQTC may create a disconnect between the resulting Regional Housing Needs Assessment allocations and achievable levels of service within the next 8 years period given funding and other constraints. The plan should clarify where HQTAs/HQTCs are based on committed, financially constrained, or strategic projects.	The high quality transit areas (HQTAs) in Connect SoCal are based on existing high quality transit corridors identified for the Connect SoCal base year of 2016 as well as financially constrained planned transit through the horizon year of 2045. The HQTAs do not include financially unconstrained or strategic projects. SCAG's draft RHNA allocation methodology for the 6th cycle factors this as an input for allocating the state-mandated 1,341,827 housing units determination in order to better align housing planning with planned future transit infrastructure.
0001368.16	Page 97, Section "Introduction" - 1st Column, 2nd Paragraph. As with Comment #8 above, it should also be noted here that one county (Ventura) does not have a sales tax measure to generate local transportation funding resources. The plan should address the impact to transportation funding for local agencies without dedicated local revenue sources for transportation. Similarly, Page 100, Section Local Sales Tax Measures - 1st Column, 1st Paragraph - Text here notes that Ventura County does not have a dedicated sales tax measure for transportation. What are the implications to Ventura County with respect to implementing the RTP/SCS?	Comment noted. We recognize the challenges of jurisdictions without a dedicated source of revenue for transportation projects and can clarify as such where appropriate.

ID	Comment	Response
<p><i>Submitted by</i> Ventura County Transportation Commission Submittal 0001368 Related Documents Link</p>		
0001368.17	<p>Page 133, Section "Outcome 3: Safety & Public Health". The Draft RTP finds that, if the plan is implemented, Ventura County's transit mode share will increase to 3.2% for work trips and 2.6% for all trips (currently transit is at 1.3% of work trips and 0.5% of all trips, per the Ventura County Traffic Model and the American Community Survey) for an overall Ventura County transit investment of \$303,926,000. This suggests that the plan should include discussion of the tradeoffs between mode/policy costs and effectiveness of achieving VMT and GHG reduction goals.</p>	<p>While Connect SoCal does not calculate benefit/cost ratios by modal category, an overall transportation system investment benefit/cost analysis is conducted as one of the Connect SoCal scenario performance measures. The results of this, and the other Connect SoCal performance measures, are presented in Table 5.1 in the Final Connect SoCal, Chapter 5.</p>
0001368.18	<p>The plan recognizes that land use planning and zoning regulations share in the responsibility for regional housing shortages; however, this seems to be in tension with other policies in the plan which could make housing more expensive. In general, there seems to be a lack of recognition that several policies being pursued are likely in tension with one another. For instance, the plan notes Los Angeles as the most dense urbanized area in the U.S., and other urbanized areas where transit is more effective tend to have a different distribution of density than LA. The plan says that this limits the effectiveness of transit in the region. To overcome this, the plan focuses on HQTAs, which could limit the total amount of new affordable housing built in the region.</p>	<p>Comment noted. Connect SoCal's policies and strategies are mutually supportive to move the region toward a more efficient development pattern and encourage development of diverse housing types in areas that are supported by multiple transportation options, among others. In addition, Priority Growth Areas in Connect SoCal are not limited to only high quality transit areas (HQTAs), but also include job centers, neighborhood mobility areas and livable corridors. Also see the Final Sustainable Communities Strategy Technical Appendix regarding affordable housing.</p>
0001368.19	<p>Pages 16, 17, 151 - There is a recognition in the plan about a shift in housing and transportation expectations, notably slowing of population growth, Millennial preferences for urban/suburban lifestyle, TNC's (Uber/Lyft), and congestion. However, the plan does not include a robust discussion on how policy should be altered in light of these developments.</p>	<p>Comment noted. A detailed policy discussion on these topics can be found in the Final Congestion Management Technical Report and Final Demographics and Growth Forecast Technical Report.</p>
0001368.20	<p>Pages 120-127, Section "Performance Outcomes" - The plan is not always explicit about if scenarios and projections are coming from the Activity-Based Model or the traditional SCAG 4-Step Model. According to our model consultant, the Activity-Based Model has not been validated.</p>	<p>In response to your comment regarding the RTP/SCS scenario modeling process, SCAG used an activity-based model (ABM) in the development of Connect SoCal. The SCAG ABM was calibrated, validated, and completed a comprehensive peer review process. While the technical specifics of the SCAG scenario modeling process are not discussed in the course of the Performance Measures sections, a more detailed description of the modeling process is provided in the Final Transportation Conformity Analysis Technical report.</p>
<p><i>Submitted by</i> Ventura County Transportation Commission Submittal 0001380 Related Documents</p>		
0001380.01	<p>The Projects Lists in Tables 1, 2, and 3 are organized in alphabetical order, which would make sense, except that all of the projects for Ventura County appear after multi-county projects (categorized as "Various" in the County column). It would be more appropriate to list all of the single-county projects first, such that the multi-county ("Various") projects appear at the end of the list.</p>	<p>Comment noted. The arrangement of projects in the Project List Technical Report has been revised to include Ventura before Various Counties.</p>
<p><i>Submitted by</i> Ventura County Transportation Commission Submittal 0001381 Related Documents Link</p>		
0001381.01	<p>As noted in the attached comments, we respectfully request that Ventura County projects be listed in the Project List before the "Various" category, consistent with other Counties.</p>	<p>Comment noted. The arrangement of projects in the Project List Technical Report has been revised to include Ventura before Various Counties.</p>

ID	Comment	Response
<i>Submitted by</i>	Ventura County Transportation Commission	Submittal 0001387 Related Documents Link
0001387.01	See attached excel for FTIP comments.	Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. The proposed changes to FTIP projects have been submitted as part of Ventura County Transportation Commission's 2021 FTIP submittal. Table 1 of the Project List Technical Report containing FTIP projects reflects currently programmed projects in the 2019 FTIP. The 2021 FTIP is anticipated to be approved in December of 2020 and at this point the updates will be reflected in the FTIP.
<i>Submitted by</i>	Walk Bike Long beach	Submittal 0001317 Related Documents
0001317.01	electrification is a major focus. Is there evaluation for land use with the exponential expansion of wind and solar, the presumed source of this power	There is not a land use plan specifically for wind and solar power. However, SCAG pursues innovations and funding opportunities to increase the use of wind and solar energy production, as well as encourages land use that reduces energy use.
<i>Submitted by</i>	Westwood South of Santa Monica Blvd Homeowner's Association	Submittal 0001439 Related Documents Link
0001439.01	Thank you for the opportunity to comment on the draft regional transportation plan whose many goals will guide transportation and land use policy and program for the coming years in the SCAG region through 2045. As stated in the opening chapter of the draft, the regional plan seeks to chart "a path toward a more mobile, sustainable and prosperous region by making key connections: between transportation networks, between planning strategies and between the people whose collaboration can make plans a reality." While fulfilling this vision, it is important to note that the plan must do much more than merely coordinate transportation projects, reduce greenhouse gas emissions, meet federal Clean Air Act requirements, promote the preservation of natural and agricultural lands, promote measures that improve the public's health, ensure the maintenance of roadways and transit infrastructure, provide needed support for good's movement, promote the more effective use of our limited resource, usher in new technologies related to transport and transportation – all while supporting healthy and equitable communities and restoring endangered and fouled habitats (for all species as well as our human brothers and sisters). In short, this plan and future regional planning must usher in a form of policy evolution – a culture shift that must be sensitively and carefully advanced understanding the many factors involved. Although laws can be passed and policies can be adopted, none will fully succeed without careful attention played to the human factors involved and to the careful design of transitions. As it pertains to the shift away from the Southern California car culture, SCAG and all its member governments are likely painfully aware of the need to build bridges between "what is" and "what must be." What concerns me as I review proposed policies and laws, is the failure to acknowledge that the realities of the impacts of the transition cannot be ignored or be "sold" to the public by platitudes.	Thank you for your comments. Comments noted.

ID	Comment	Response
<i>Submitted by</i>	Westwood South of Santa Monica Blvd Homeowner's Association	Submittal 0001439 Related Documents Link
0001439.02	<p>The public's exposure to the Connect SoCal plan through recent webinars and telephone town hall did not and could not "get into the weeds" of the plan. These overviews would not have led to an understanding of what will come to pass over time. They did not lead people to ask questions that get to the root of some of the challenges that we face in the implementation of a plan like Connected SoCal. The ability to make meaningful comment from the public's point of view, experience and background is quite limited – especially understanding that SCAG has worked with representatives of the region's member cities to seek input and incorporate those thoughts into the plan. How can we as laypersons make a contribution to this process?</p>	<p>Comment noted. SCAG held a series of 28 open house-style workshops, a telephone town hall and a survey offered in 17 languages to gather input from the public. These efforts resulted in the collection of more than 12,000 unique comments and more than 4,000 survey completions. Stakeholders were communicated with via email up to and following release of the draft Connect SoCal. During this plan review phase, SCAG held three public hearings, 21 public briefings, a telephone town hall and a webinar to communicate the components of the plan. All of this was done to communicate clearly and easily the goals and details of the plan. SCAG continues to assess how to better communicate with the general public and make modifications based on public input for future planning cycles. SCAG will consider new mechanisms to improve communications regarding details of the planning process and continue to create meaningful opportunities for engagement in the planning decisions.</p>
0001439.03	<p>We have observed and been recipients of the implementation of LA City policies that seek to support some of the same goals being sought in the Connect SoCal plan. Some of our thoughts in response to what we have seen in the rollout of those policies and the Connect SoCal plan follow:RE: Complete StreetsThe emphasis on providing significant density bonuses to developments on what have traditionally been our communities' commercial corridors has resulted in the significant loss of local community serving merchants – the very backbone of retail and service providers needed in a community. Small retailers and service providers are often the first displaced tenants in the reorientation of commercial corridors into so-called mixed use development sites. However, it must be noted that the "mixed-use" developments are often nothing more than residential developments. In fact, Los Angeles' RAS mixed use development zone does not require a project to have a mixed use component. Further, many residential projects that claim to incorporate ground floor "live-work" units which are purported to be active pedestrian oriented uses are most often purely residential uses with no street orientation.</p>	<p>Thank you for your comment.</p>
0001439.04	<p>Creating purely residential communities with proximity to transit without providing for the community services and retail support for the growing dense population will require residents to travel distance to support their daily living needs.</p>	<p>Please see the Focus Growth Near Destinations & Mobility Options section of the Sustainable Communities Strategies list in Chapter 3.</p>
0001439.05	<p>Allowing residential development to occupy both commercial and light industrial/manufacturing zoned land (much the result of the very generous entitlement bonuses given to residential development) in the push to provide new housing will result in the need for those residents to have to travel far distances to reach their work locations. There is a clear need to identify and reserve land for job opportunity also near transit. Housing and jobs may not be coming closer together without more attention to the current realities.</p>	<p>Comment noted. The need for a regional jobs-housing balance is important to the sustainability of the Southern California region. It is also important to provide both housing and job opportunities near transit which is reflected in the Connect SoCal Final Growth Vision. Please see the Sustainable Communities Technical Report for more detail.</p>

ID	Comment	Response
<i>Submitted by</i>	Westwood South of Santa Monica Blvd Homeowner’s Association	Submittal 0001439 Related Documents Link
0001439.06	<p>Further: Re: Jobs and Housing balance: While we understand that the RHNA process has resulted in the placement of the bulk of new housing to be in the coastal zones of SCAG’s region, we do not believe that it is a sound policy to rely on the coastal zone to absorb all new population – both because of the inherent higher cost of land in proximity to the coast (something seen worldwide), and the fact that each region as its own ecosystem has what we believe is a carrying capacity. The plan talks about the importance to preserve farmland and open space, but it does not address the need to provide for needed infrastructure such as open space in the urban areas of growing population density. Where is the recognition of the need to develop urban open space, to develop greenbelts, to regulate the proximity of housing adjacent to transit corridors and noxious uses? Los Angeles City, with which we are most familiar, has land zoned for density to accommodate projected population growth. However, developers do not wish to build in all the areas where land would accommodate new growth. Yet, we are pressed to rezone neighborhoods often creating what many view to be a future unlivable city. With sewer and water mains bursting, with streets crumbling, how much added development can our urban areas absorb? The assumption that the urban areas are able to support large density increases is open to serious questioning. Many would challenge the statement made on page 12 of the project summary: “.... by focusing new residential and commercial development in higher density areas already equipped with the requisite urban infrastructure.”</p>	<p>Detailed information regarding Connect SoCal’s Growth Forecast can be found in the Demographics & Growth Forecast Technical Report, and indicate the extensive local review process relied upon for forecasting. This process allows local jurisdictions to integrate their infrastructure plans and concerns into SCAG’s forecast. The 6th Cycle RHNA is a distinct and separate planning process but relies on shared data elements. Please also see Master Response #1.</p>
0001439.07	<p>What is the strategy to develop population centers with both jobs AND housing where land costs will result in affordable workforce housing and where these newer communities will not endanger agricultural producing land or sensitive habitats? What kinds of incentives can be developed to foster the establishment of job centers in these new population areas? These sub-regional job centers can be built with compact land uses that incorporate open space protections as well as urban open space. These are opportunities to build model communities in a more dense format than former single family home communities.</p>	<p>The growth vision for Connect SoCal does incorporate many entitled new and planned communities that endeavor to achieve the many goals articulated in your comment. See "Center Focused Placemaking" in Chapter 3, as well as the Sustainable Communities Strategy Technical Report for more detail on the Final Growth Vision.</p>
0001439.08	<p>Regarding housing and the high cost of housing: We all agree that there is an affordable housing crisis and that there are no simple fixes. This “crisis” has been brewing for decades while real estate speculation, the mortgage crisis fiasco, foreign investment in CA property (with many properties left empty and no taxes assessed on them to encourage occupancy) and a growing short-term rental market that removed residential units from the housing market took hold. While Connect SoCal is a transportation program, it is important that these factors be noted and addressed for no current measures have addressed any of these contributors that have helped to bring us to where we are today and have placed added pressures on our housing supply.</p>	<p>While there are a number of factors that contributed to the affordable housing crisis, a thorough discussion of the issue is outside the scope of this Regional Transportation Plan/Sustainable Communities Strategy. Please see the Key Connections: Housing Supportive Infrastructure section in Chapter 3 for a highlight of potential tools to improve housing supply in the region.</p>
0001439.09	<p>RE: The shift from automobiles to a more transit-oriented transportation realm. This is an evolutionary process best accomplished by halting the demonization of drivers or the creation of an “us vs. them” battle. Innovative programs to incentivize transit use (when possible/realistic) and reduce vehicle use that are not punitive are needed.</p>	<p>Comment noted. Connect SoCal identifies a number of strategies to incentivize transit use, including the use of technology and innovation—to improve transit speed and reliability, provide improved trip planning and fare payment options, address first/last mile challenges to accessing transit, and make transit travel seamless between routes and modes.</p>

ID	Comment	Response
<i>Submitted by</i>	Westwood South of Santa Monica Blvd Homeowner’s Association	Submittal 0001439 Related Documents Link
0001439.10	Road maintenance and improvements must be supported by augmented fees levied on electric vehicles as well as those raised through gas tax funds. Policies that allow for annual fees on electric vehicles are important to reflect the use of the roads by these vehicles which currently may not be paying their fair share. However, we foresee potential backlash in the adoption of both a gas tax for road maintenance and a use tax based on miles travelled. Should it not be one or the other? Whatever funding mechanism is adopted should build in an established adjustment for inflation without the need for further legislative action. Is it fair to seek both a mileage-based user fee AND a local road charge program?	Gas tax revenues, in real terms, are actually in decline as tax rates (both state and federal) have not been adjusted in more than two decades while the number of more fuel efficient and alternative powered vehicles continue to grow. The Plan identifies several new funding sources that are reasonably expected to be available and are included in the financially constrained plan. These sources include adjustments to existing state and federal gas tax rates and a long-term replacement of state and federal gas taxes with a mileage-based user fee to maintain the historical purchasing power of the gas tax. In addition, California SB 1 currently includes an annual fee on electric vehicles and adjustments for inflation. Please see the Transportation Finance Technical Report for further discussion.
0001439.11	The possible investment of private equity firms in the construction and/or operation of transit will come at a future cost. We are concerned that decisions made are done with clear understanding of the cost to future users and how that compares with public financing options. Those discussions should be held in the open in a transparent manner.	Comment noted.
0001439.12	The placement of bike and bus only lanes that results in the intentional “traffic calming” on streets often comes with unintended consequences for nearby streets. Our streets have traditionally been characterized by their ability to carry different volumes of traffic. Our community supports streets designated to provide safe passage for bicyclists. However, we also believe that certain streets should be designated to move vehicles and not bicycle traffic. We are extremely concerned that the intentional slowing of traffic on arterials will result in the transfer of vehicles from the arterials to our local community streets – streets where we believe it is safest for pedestrians and bicycle riding. The adoption of “bus only” lanes will present some of the same challenges.	Comment noted. Improvements to transit and bicycle infrastructure align with the Connect SoCal goal to “Improve mobility, accessibility, reliability, and travel safety for people and goods.” SCAG supports the implementation of bus only lanes in the SCAG region in order to increase transit ridership and speeds. SCAG encourages extensive engagement by implementing agencies with the populations that use and travel on local community streets.
0001439.13	Transit use: There are those who can easily access transit and there are those that cannot do so. Each of those groups has an additional subset—those who use transit and those who do not. It is likely unrealistic to expect that all can and will use transit. In some families, some family members will use transit and others will not/cannot do so. We must recognize that Los Angeles is a city that is separated by a mountain range – a mountain range separating valley and city areas. While METRO has current plans to connect the two areas by fixed public transit, we are not there yet. And yet, there are plans to levy user fees to riders who enter the Westside via “GO ZONES” – also known as tolling areas. So long as there are significant gaps in our transportation network, GO ZONES or local toll areas will be viewed as schemes devised to raise funds to help support transit development/maintenance. The proposed Westside GO ZONE now being discussed does not address the impacts on those who cannot adjust work shifts, of those who must access needed medical care within a GO ZONE area. This will strike those affected as yet another tax that is being levied to make up for otherwise unsound funding mechanisms for our transit/transportation infrastructure.	Comment noted. Go Zones are locally-designated geographic areas where a suite of mobility service options are provided together with incentives to reduce dependency on personal automobiles. The Plan identifies part of West Los Angeles and downtown Los Angeles as areas where a future tolling program would provide the most benefits. SCAG recognizes that the availability of transit is necessary for successful implementation of a tolling program, and plans for Go Zones to incorporate future planned investment in the transit system. SCAG does expect that all trips will be taken by transit, and assumes that some trips will be tolled. Please refer to the Go Zone Report for a discussion of the potential benefits to and impacts on zone residents, those who travel to the zone at various times and by different modes, as well as businesses within the designated tolling area.

ID	Comment	Response
<i>Submitted by</i>	Westwood South of Santa Monica Blvd Homeowner’s Association	Submittal 0001439 Related Documents Link
0001439.14	The Westside has long waited to receive fixed public transit. The EXPO line exceeded ridership estimates from the minute it opened and yet frequency of trains has been reduced. The “Subway to the Sea” will not reach the sea and will end at the VA removing a major transit connection along a major travel corridor. The lower population levels in hillsides and substandard streets there will likely make it unlikely that transit can be justified to serve hillside residents (although microtransit may be helpful there). Why is the Westside being identified as the target of a tolling program? Why isn’t the downtown area, where major investments in transit, including the Downtown Connector) have been made and where the Gold Line, Subway, Union Station, Metrolink all meet? Promises that low income drivers will somehow be subsidized if entering the area does not address the many issues presented by tolling in local communities.	The Final Connect SoCal identifies both West Los Angeles and downtown LA as potential areas that would provide the greatest benefits from a tolling program in the future. SCAG’s Go Zone report details the methodology used to identify these areas.
0001439.15	It is up to the transit providers to present an attractive and efficient option for prospective riders. It is an unfortunate fact that currently some of our transit options are not viewed by riders as realistic options. The reasons for this are many: Poor access to stations, lack of parking where transit options to reach transit are not available, unrealistically long travel times, perceived unsafe conditions (particularly for women traveling along after dark), filthy conditions, unreliable service.	Comment noted. Connect SoCal identifies a number of strategies to incentivize transit use, including the use of technology and innovation--to improve transit speed and reliability, provide improved trip planning and fare payment options, address first/last mile challenges to accessing transit, and make transit travel seamless between routes and modes--and better integrate our transportation and land use planning.
0001439.16	First mile/ Last mile: Many transit riders and prospective transit riders cannot avail themselves to use scooters or bicycles and may not be able to reach transit on foot. The needs of those individuals need to be recognized and addressed. This is perhaps a growing challenge as the Baby Boomer generation ages.	Comment noted. The First-Last Mile Infrastructure strategy identified in the Active Transportation Technical Report addresses the need for accessibility improvements to transit access in the region. SCAG acknowledges the need for continuing analyses related to safe routes for seniors.
0001439.17	Data has demonstrated that Lyft/Uber-style ride providers are often major contributors to street congestion.	While access to data on transportation network companies' activities is limited, research studies have concluded that ride-hailing services such as Uber and Lyft can and often do contribute to congestion and other negative outcomes on our streets. However, given the lack of transit availability in many parts of our region, such services have become critical for certain communities. That said, SCAG prioritizes transit, active transportation and carpooling above single-occupancy ride-hailing trips when planning for the future.
0001439.18	Further, the safety of passengers in Uber/Lyft vehicles is becoming a growing issue suggesting that if our transit networks are to rely on these forms of transit then more regulation may be required.	SCAG looks forward to continuing to advocate for the safety of all road users, including ride-hail passengers. SCAG does not have authority to regulate transportation network companies (TNCs) such as Uber and Lyft. However, SCAG can and will seek to provide guidance and promote best practices and policies regarding how TNCs may best complement, not compete with, the regional public transportation system.

ID	Comment	Response
<i>Submitted by</i>	Westwood South of Santa Monica Blvd Homeowner's Association	Submittal 0001439 Related Documents Link
0001439.19	<p>It is important for planners to recognize that vehicles will not disappear from our environment and that removing parking spaces in residential developments in the thought that this will stop people from driving is wishful and illusory thinking. Providing parking is necessary because not all members of a family will be able to use transit given their work responsibilities and the vast geographic area this region represents. Further, some jobs are shift jobs with irregular hours that do not conform to transit availability. Space provided for parking in buildings should be designed so that it can be repurposed in the future should need for that use be reduced. LA permits developments under the TOC/Transit Oriented Community Guidelines that provide ½ space of parking per unit – regardless of the number of bedrooms in those units. Some projects provide no/zero units assuming that those who live near transit will not own or have a need to park a loaned vehicle. Is this realistic? We think not. At the very least we suggest that data be gathered from all new projects that can help to document how many bicycle and automobile spaces have been provided, how many are in use, whether there are waiting lists seeking access to a parking space. We also suggest (and continue to do so) that projects permitted with bonus densities granted as a result of proximity to transit be required to provide new residents and employees FREE transit passes for an initial period of time, followed by discount pass provision upon proof of regular transit use. Those buildings have benefited from significant “upzoning” and development rights at no cost. They should be part of the process in supporting the use of transit whenever possible. Citizens should not need to have to suggest such a policy. It should be expected, particularly since more and more developments are being built “by right” with little opportunity for community members to participate in making suggestions for improvement.</p>	<p>While SCAG provides regional guidance in certain policy areas, ultimately parking requirements are under the jurisdiction of local municipalities or counties. We will take your comment into account when crafting guidance for our member jurisdictions on this topic, including the suggestion of free transit passes for TOC-related developments.</p>
0001439.20	<p>We are grateful that SCAG has made strong efforts to seek public participation in this effort.</p>	<p>Thank you for your comment. Comment noted.</p>
<i>Submitted by</i>	Westwood South of Santa Monica Blvd Homeowner's Association	Submittal 0001440 Related Documents Link
0001440.01	<p>It is extremely troubling to us that measures to incentivize housing development have resulted in the streamlining of the entitlement process that removes our input from the process. Even worse is proposed STATE legislation such as SB 50 that seeks to implement zoning from a statewide perspective – voiding local community plans and local planning efforts. We look to SCAG to be an advocate in challenging the disempowerment and silencing of the voices of local communities in the planning the future of our communities.</p> <p>Thank you for your consideration.</p>	<p>Comment noted. While SCAG recognizes the critical need for more housing throughout the region, we support and respect local control of land use decisions. See the Key Connections: Housing Supportive Infrastructure for our intended efforts.</p>

ID	Comment	Response
<i>Submitted by</i>	Aitoumeziane, Adam	Submittal 0001285 Related Documents
0001285.01	<p>Notably absent from proposed rail projects is any form of increased service between Los Angeles or San Bernardino and the Victor Valley cities. In fact, after thoroughly reading through the draft plan I couldn't find a single proposal to improve mass transportation through Cajon Pass to better serve the Victor Valley region - be it by new rail or bus rapid transit service or improvements to the very limited existing rail and bus routes connecting the two regions. I-15 through Cajon Pass is one of the most heavily congested commuter routes in Southern California, to be expected for the only freeway connecting Las Vegas and the Victor Valley to the rest of SoCal. That there is no discussion of improved transit options through Cajon Pass is the draft plan, beyond planning for express lanes in the 2040 timeframe, is a slap in the face to one of the fastest growing regions in San Bernardino County. Beyond reducing congestion and providing alternative transportation options, the volume of greenhouse gas emission produced by personal vehicle trips through Cajon Pass - the majority of which are single occupant vehicles - demands a viable mass transportation alternative. Adding express lanes cannot be the only way congestion management is handled for the Cajon Pass corridor; to limit improvements only to increased personal vehicle throughput is anathema to the pressing need for lower GHG emissions. The booming population north of Cajon Pass, the inexorably increasing congestion through the pass, a need for alternative transit options when inclement weather or wildfire close I-15 (as seen the past week when winter weather shuttered the freeway in the midst of Thanksgiving traffic), and our shared societal obligation to reduce greenhouse gas emissions and build a sustainable society all warrant at least a long-term vision for mass transit connections between L.A./San Bernardino and the Victor Valley. Anything else is ignoring the growing problems faced by high desert residents. If you don't think so, I encourage you to attempt to drive north through Cajon Pass on a Friday evening.</p>	<p>SCAG coordinated with the San Bernardino County Transportation Authority and transit providers to identify potential projects, and Connect SoCal does not include rail or bus rapid transit improvements through the Cajon pass in the financially constrained plan. However, there are strategic or unfunded projects that would serve this travel corridor and may be incorporated into the financially constrained plan once reasonably available funding and local commitment is identified. Connect SoCal does not list individual local bus routes but does include substantial commitment of \$173.9 billion nationwide for increased transit operations and maintenance. Specific improvements to individual local bus routes are determined by the transit operator.</p>

<i>Submitted by</i>	Alan	Submittal 0001345 Related Documents
0001345.01	<p>My comment is with regard to the extension of the metro green line south. I and many of my neighbors are strongly in favor of option 3 down Hawthorne Blvd. I am not in favor of the path on the right of way. Option 3 is right for me!-The right of way path is near several schools and parks. Cuts directly behind single family homes. This is a safety risk for many kids. Especially as schools are let out.- Noise issues being literally behind hundreds of homes. - Doesn't support the economic development of Hawthorne Blvd if it's on the right of way. Hawthorne Blvd has a red car train in years past. The median has the space for this again. Run the train through a commercial corridor and not through the middle of residential neighborhoods in Lawndale and Redondo Beach.- Lastly, traffic will be made worse with train travel on the fifth of way. This cuts through several streets such as 182nd which would back up during rush hour if trains are passing.</p>	<p>The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects including the Green Line Extension to Torrance. More information can be found on the Metro website at https://www.metro.net/projects/green-line-extension/. Inquiries and comments regarding Metro's current environmental review process should be directed to the Metro project manager.</p>

ID	Comment	Response
<i>Submitted by</i> Brink, T.L. Submittal 0001340 Related Documents		
0001340.01	<p>First of all, I want to salute the Southern California Area government group that's put this together. I think you've looked at a number of complex goals and tried to come up with something that is a realistic plan to meet those goals. I encourage you to go forward, and the only advice I would give is to fine tune where you are going with continuous access to data. I don't want you to be data driven, but you have to be data informed. Specifically, I'm going to recommend three sources of data.geographical data. The company I know best in this area is the Esri Company in Redlands, California. They're particularly interested in land use and public transportation. I think you would find them a very useful source of information on the micro level to find out how public transportation and housing are being utilized in local areas.The second source of information would be the big data that would come from your ridership. Every time somebody swipes a card, we should have information on who is swiping and going where. It doesn't have to be done on the individual level for concerns of privacy, but the idea that we know that, you know, maybe this is a medical trip, this is an educational trip, this is a work trip, this is a pleasure trip. That would be very helpful in terms of scheduling the timing of different trips.The third source of information that I do recommend is more qualitative information. That would come from things like focus groups. I think it's important to figure out why people aren't using public transportation more or the converse of that -- why are they still getting into their cars and wasting so many hours and burning so much gas to do their trips? And only this kind of qualitative research that can probe the process of decision making that riders and potential riders are using can give us the insight into coming up with what kinds of tweaks do we need in making transportation more appealing to more people for more trips. So good job. Keep it up, and keep being informed by data to continue on with your great goals.</p>	<p>Comment noted. SCAG already uses some of the data sources you suggest. SCAG will consider suggested data sources for future plan updates, as relevant and applicable.</p>
<i>Submitted by</i> Freeman, Pete Submittal 0001319 Related Documents		
0001319.01	<p>Would it be possible to create a transit hub at the old SCE substation site on the northwest corner of Ventura Ave and Santa Clara st. This could provide a one stop connection point for the Ventura River Valley, downtown and west Ventura and a the VCTC bus heading to Santa Barbara. The land is currently vacant.</p>	<p>SCAG supports implementing new transit services that increase transit connectivity and transportation options for residents. SCAG worked with the Ventura County Transportation Commission and transit providers in Ventura County to identify proposed transit service improvement projects for Connect SoCal. We will share your suggestion with these agencies for consideration in future planning efforts.</p>
<i>Submitted by</i> Fung, Henry Submittal 0001325 Related Documents		
0001325.01	<p>The plan needs to meet the air quality conformity guidelines.</p>	<p>Connect SoCal meets all federal transportation conformity requirements as documented in the Transportation Conformity Analysis Technical Report.</p>

ID	Comment	Response
<div style="display: flex; justify-content: space-between; align-items: center;"> <i>Submitted by</i> Fung, Henry Submittal 0001326 Related Documents </div>		
0001326.01	<p>What is local input? Is local input just cutting and pasting general plans from the city? A city doesn't want a lot of development in their cities, so they zoned very little development and they're just cutting and pasting.</p>	<p>SCAG engaged with local jurisdictions directly through our multi-year Bottom-Up Local Input and Envisioning Process, which included one-on-one engagements with local jurisdictions as well as regular meetings with a diverse array of regional stakeholders through our Regional Planning Working Groups and Community Based Organization partnership program. Input from these engagements, as well as input received from the general public through Connect SoCal Public Workshops, helped to inform the eventual development of the Growth Vision for Connect SoCal. Building on the policies within the Growth Vision, SCAG worked to craft a Forecasted Development Pattern for future population, household, and employment growth that reflected the needs of the region in terms of a diversity in housing choices, improved housing affordability, accessibility to employment and other destinations. The Forecasted Development Pattern targets growth in areas that can achieve the highest level of reduction in greenhouse gas emissions (GHG), and de-emphasizes growth in areas that are constrained due to natural resources and hazards, such as anticipated sea level rise and fire risk. To ensure that this can be implemented at the local level, SCAG utilizes locally anticipated growth as conveyed by jurisdictions at the town, city, and county levels. SCAG also conducted a "peer review" of the Forecasted Development Pattern with local jurisdictions to ensure that entitlements (projects already in the pipeline) are captured and that locally planned capacities for growth are reflected (as conveyed by jurisdictions). Technical refinements were made to finalize the Forecasted Development Pattern based on this feedback, including utilization of "locally envisioned growth" in some instances at the neighborhood level when it furthered Connect SoCal's strategies and policies – assuring that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.</p>
<div style="display: flex; justify-content: space-between; align-items: center;"> <i>Submitted by</i> Fung, Henry Submittal 0001327 Related Documents </div>		
0001327.01	<p>Inland Empire and L.A./OC have different 511 systems. There's no regional fare card, so living in Pomona, you have to use different apps. You got to ride OmniTrans, use an app. You go to L.A. County, you have Metro. You have a tap card. There's no real coordination. Some transit systems, like OmniTrans don't even run on holidays, like Thanksgiving and Labor Day, where people might need to go to work, they need to go to events. And so low-income people who live in San Bernardino County, they can't ride transit on holidays. So they have to drive or they have to use ride services.</p>	<p>The recently-adopted SCAG Transportation Demand Management Strategic Plan recommends consolidating the 511 ridesharing and transit itinerary platform for Los Angeles, Orange, Riverside San Bernardino and Ventura counties. Connect SoCal also recommends and supports greater regional transit pass platforms including a universal pass.</p>
<div style="display: flex; justify-content: space-between; align-items: center;"> <i>Submitted by</i> Fung, Henry Submittal 0001328 Related Documents </div>		
0001328.01	<p>There's new funding sources, like air tax, which AQMD, South Coast Air Quality Management District, is proposing. What is SCAG's role in the air tax? And I'd like SCAG to take a more robust and bold role. Not just being a facilitator, but more pushing people to get in that direction. You know, encouraging ideas from the different regions.</p>	<p>Comment noted. Although SCAG is aware of the AQMD's sales tax initiative, we do not have a role in the process.</p>

ID	Comment	Response
<i>Submitted by</i>	Fung, Henry	Submittal 0001329 Related Documents
0001329.01	We have great ideas throughout the regions. South Bay COG has a neighborhood electric vehicle. We have CV Link in Coachella Valley. You know, road pricing, I think, is something that SCAG has done with the express travel lane study. And those are all great ideas. We want to encourage that.	Thank you for your comment. Comment noted.
<i>Submitted by</i>	Fung, Henry	Submittal 0001330 Related Documents
0001330.01	The public input process needs to be a little bit better. Needs to be in San Fernando Valley. There wasn't a public meeting. L.A. meeting was a little bit last minute. So I like the telephone town hall, and the survey was good.	Comment noted. SCAG conducted a briefing in the City of Van Nuys on January 16, 2020 for the draft Connect SoCal. SCAG will continue to identify and use new technologies that make participating easier and available to a wide diverse audience, such as the tele-town hall and webinar.
<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.02	It is important to note that Caltrans is requiring that agencies create a Local Road Safety Plan (LRSP) before getting any federal Highway Safety Improvement Program funding. https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/highway-safety-improvement-program/local-roadway-safety-plans This can be fulfilled with a Vision Zero action plan or other plans. SCAG should assist jurisdictions in notifying them of this funding opportunity and support their applications for creating LRSP. While I commend SCAG on having a comprehensive focus on safety, including separate sections for motorcyclists, bicyclists, commercial vehicles, aging people, and young people, there is no section on scooter safety. The increase in electric scooters is only going to grow. In addition to rental scooters, personal e-scooters are now extremely affordable, under \$150 at Walmart during the 2019 holiday season. There are concerns from some bicyclists about the use of 15-25 mph scooters on bike trails, while scooter riders are uncomfortable on arterials sharing roadways with SUVs and trucks.	Comment noted. The Transportation Safety and Security Technical Report has been updated to include information regarding Local Road Safety Plans.

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<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.03	<p>I am pleased to hear that the State is "leading an initiative called the California Integrated Travel Project (Cal-ITP) to facilitate multimodal trip planning and payment to support state goals of increasing transit ridership, reaching environmental targets, lowering costs, creating efficiencies, improving customer experience and promoting equity. Current efforts focus on incentivizing statewide trip planning and fare payment standards and other integrated travel improvements over time." However, as in my past comments on previous cycles, SCAG also has a role in ensuring that state and federal funds are not wasted when multiple fare payment technologies are submitted for funding. Currently, there is a disconnect in the region with the Inland Empire having a different 511 system from Los Angeles, Orange, and Ventura Counties, and in the 90's the regional SCAG carpool matching service was broken up and Balkanized into different counties. Today, multiple agencies use different apps for transit payment. SCAG can help facilitate differing agencies to come up with a standard that is used regionally for fare payment. This will also support transit ridership and greenhouse gas reduction goals. The San Diego Association of Governments has taken on fare setting powers, partially because they recognize the feedback that sound fare policy has with providing sustainable and usable transit service. They are the lead agency on the COMPASS card and COMPASS Cloud, a single mobile fare payment system for all transit systems in the county. While SCAG may not wish to take on this role, they should at least ensure that Metrolink, Omnitrans, OCTA, and LA Metro have fare technologies that are compatible with each other, without kludges or passenger confusion.</p>	<p>The recently-adopted SCAG Transportation Demand Management Strategic Plan recommends consolidating the 511 ridesharing and transit itinerary platform for Los Angeles, Orange, Riverside San Bernardino and Ventura counties. Connect SoCal also recommends and supports greater regional transit pass platforms including a universal pass.</p>
0001404.04	<p>Related to the comments on scooters, Wally Siembab at the South Bay COG has touted a "slow speed network" which could accommodate scooters, neighborhood electric vehicles, and other technologies. In Chapter 3 of the plan SCAG briefly mentions "neighborhood mobility areas" but this concept could be further developed. In particular, slow speed autonomous vehicles are likely to be much safer and provide a large benefit to the aging and disabled population, than being driven or driving in passenger cars. This concept can also have regional applications, such as with CV Link in the Coachella Valley connecting many cities in the area with an all weather, traffic free route. SCAG's Technical Working Group has seen presentations regarding modeling for speculative technologies such as Uber Air. Any such service would have serious health, safety, and quality of life issues related to hundreds, if not thousands, of small aerial vehicles buzzing over our heads. It is important when SCAG staff and members hear these presentations to be mindful of all the challenges in implementation.</p>	<p>SCAG is committed to helping its member agencies navigate the adoption and accommodation of "slow speed" micromobility options such as scooters. We have produced materials that provide guidance to cities when they are debating how to regulate such mobility options. We want to ensure that everyone benefits from the introduction of new technology and that these options don't negatively impact marginalized communities. SCAG is committed to eliminating severe and fatal injuries on our region's streets, and increased scooter and other micromobility usage fits into that framework. However, SCAG does not have regulatory authority to directly plan for scooters, so we may provide guidance to our member agencies.</p>
0001404.05.1	<p>Is a real (i.e., after inflation) fare growth rate of 1.8% reasonable given declining farebox recovery ratios among all transit agencies, as recently studied in SCAG's own report on dropping ridership? Even if ridership stabilizes and grows, there will be pressure to hold nominal fares the same, since fare increases have been proven to cause declines in ridership.</p>	<p>As detailed in the Transportation Finance Technical Report, a real growth rate of 1.8% is based on the historical growth rates region wide. The following rates were used in the forecast: Los Angeles County—1.9 percent (consistent with the LA Metro financial forecast); Metrolink and Other Transit Operators in the region—1.8 percent. These rates result in fare revenue growth below historical averages for many operators.</p>

ID	Comment	Response
<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.05.2	<p>Agencies nationwide have been looking into reducing fares for some groups, or overall. LA Metro's CEO is studying using congestion pricing as a full or partial replacement for current fare revenue, and their board recently passed exploring eliminating fares for all youth. The cost of fare collection, safety risk to drivers, and increasing dissatisfaction with the racially charged and possibly biased nature of enforcement all are leading to agencies to strongly consider not charging fares. Intercity Transit in Olympia, Washington recently found that NET fare revenue (fares minus the cost of collecting them, depositing them in the bank, printing fare media, etc.) accounted for less than 2% of its total revenue. Thus, going to a smart card or even an app for fare collection was not worth it.</p> <p>https://seattletransitblog.com/2020/01/01/intercity-transit-rolls-out-fare-freedom-and-schools-king-county-on-performance-metrics/</p>	Comment noted. Currently, Metro's policy is to collect farebox revenue. However, SCAG will continue to work with local partners such as Metro to monitor any changes such as free fares and incorporate into the Plan as appropriate.
0001404.05.3	Transit agencies need to seriously look at using NET fare revenue as their criteria when deciding to implement a new fare collection system, and determine if the increase in dwell time, enforcing fares, etc. are worth it.	The decision regarding which fare collection system to use is made by the individual transit agency based on any number of criteria specific to their local context.
0001404.05.4	Also, there are other taxes out there as well. The South Coast Air Quality Management District board has approved seeking legislative authority for an "air tax" to raise the sales tax for clean air improvements. What is SCAG's role in the air tax development? While speculative to include it is no more speculative than a TNC fee or local road charge, all of which would require 2/3 vote in the legislature.	Comment noted. SCAG has no role in the development of a tax by the South Coast Air Quality Management District.
0001404.06.1	Discuss in the document how the RTP/SCS will need to be amended to account for the changes made to general plans as a result of the RHNA allocation and the HCD determination. (It was made in a Technical Working Group presentation some time ago but should be in the RTP/SCS for the record.)	Comment noted. See Master Response #1 regarding RHNA.
0001404.06.2	Overall, SCAG tried to dispel in the RHNA process how "local input" factored in to the RHNA distribution. But, for the RTP/SCS, it seems that SCAG is letting any project in, certainly in the strategic plan section. The FTIP and Financially Constrained Plans do have to have some financial backing, or documentation that it is funded, but please describe the level of oversight SCAG has in the projects in the list, or if it is just a "cut and paste" from the county transportation commissions once the modeling verifies that it will not exacerbate air quality conformity.	Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.

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<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.07	<p>I think the telephone town hall was good, and SCAG should be commended on that. The number of community workshops on plan development provided land equity and coverage, but did not reach people living in the urbanized core. They have meetings in Joshua Tree, Victorville, Palmdale, and El Centro. Regarding ConnectSoCal meetings, the City of Los Angeles is 20% of the SCAG region. Yet there was exactly ONE meeting scheduled in the boundaries of the City of Los Angeles (Boyle Heights on May 30, 2019) posted on the list. One was later scheduled for June 6, 2019 at St. Annes Conference Center but it received no publicity from SCAG's Twitter - I was the only person to publicize it, after searching the list of meetings on the SCAG web site.</p> <p>https://twitter.com/calwatch/status/1135797225055969286?s=20 Los Angeles County has over half of the SCAG area's population yet only 27% of the workshops. There were no ConnectSoCal workshops in the San Fernando Valley (the closest ones were in Camarillo and Moorpark). The Arroyo Verdugo subregion also had no workshops. The only Saturday workshops were in Ventura and San Bernardino. The only opportunity for Westside, South Bay, and Gateway Cities residents to learn about Connect SoCal and ask questions about our region's SB 375 plan was to take time out of their workday, since those workshops were scheduled during the day. None of the workshops in LA County (except Palmdale) were scheduled to run after 6 pm. How is someone supposed to attend and learn about this important planning document unless they leave work early? How does this meet the intent of SB 375 requirements of public consultation? This is unacceptable. While the public hearings were scheduled in the evening and on weekends, the workshops are ways for the public to affect the plan before it is released. The number of public meetings in the future should better represent the proportion of residents in the region. A Saturday workshop must be held in a transit accessible location in central Los Angeles County, and evening workshops must be proportionally distributed by county population. I also support the use of workshops as opposed to public hearing style, however the communication regarding workshops as drop in was not made clear on the flyer (it was later clarified on Twitter as "stop by any time").</p>	<p>Comment noted. SCAG provided significant opportunities for input on the draft Connect SoCal. In early summer, SCAG held a series of 28 open house-style workshops, a telephone town hall and a survey offered in 17 languages to gather input from the public. These hearings and workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders. In respect to SB 375 requirements, SCAG exceeded the requirement of three workshops per county with populations exceeding 500,000. SCAG held workshops as follows: Los Angeles County, 8; Riverside County, 7; Orange County, 4; Ventura County, 3; San Bernardino County, 4. There was one workshop in Imperial County, which has fewer than 500,000 residents, one Tribal consultation workshop and a Telephone Town Hall, which was offered to the entire 6-county region. Workshop scheduling was designed to accommodate varying work schedules to reach as many stakeholders as possible. Concurrently, SCAG worked with 18 community-based organizations (CBOs) across the region, to engage populations that have traditionally been underrepresented in formal planning. The CBOs engaged the public at approximately 30 events in early summer during accessible times to the general public. This collaborative outreach strategy is aligned with SCAG's "Bottom-Up Local Input and Envisioning Process" for Connect SoCal, fulfilling the goal of engaging a "broad range of stakeholder groups" to "evaluate potential region-wide integrated land use and transportation planning strategies." These efforts resulted in the collection of more than 12,000 unique comments and more than 4,000 survey completions. Stakeholders were communicated with via email up to and following release of the draft Connect SoCal. During this plan review phase, SCAG held three public hearings, 21 public briefings, a telephone town hall and a webinar to communicate the components of the plan. SCAG provided advance notice of public hearings on the draft Connect SoCal, including publication in newspapers throughout the region, to give as many interested parties as possible the opportunity to attend and provide input. This information was also communicated via social media, email blasts and paid advertisements on Facebook to go above and beyond the legal requirements. SCAG will ensure to communicate clearly when and how workshops are being conducted in future regional transportation plan cycles.</p>

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<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.08	<p>In terms of transportation investments, Los Angeles County is doing most of the work regarding regional conformity and compliance with SB 32 greenhouse gas reduction requirements. Los Angeles is building transit through Measures M, R, A, and C; stormwater improvements through Measure W; bike lanes regionwide; and the City of Los Angeles is taking a greater share of housing construction than past years through the RHNA process. Meanwhile, Riverside and San Bernardino County are building more toll lanes and general purpose lanes, the Transportation Corridor Agency in Orange County is including widening of moderately used toll roads in the FTIP and Financially Constrained Project List, and OCTA is also moving through freeway widening. While some of these projects may reduce delay, increase travel speed, and reduce per vehicle emissions, they also increase VMT through induced travel and thus increase cumulative greenhouse gas and air pollution emissions. No TCA tollway has transit operating on it, and the Riverside and San Bernardino toll roads do not include transit facilities like direct access ramps, like in San Diego. Under SB 32, it is required by law that we reduce our greenhouse gas emissions by 40% from 1990 levels by 2030, just ten short years from now. A greenhouse gas reduction of 40% is short of the 50% of greenhouse gas emission reductions that Stanford University has identified in order to meet the United Nations IPCC criteria, to avoid a 1.5 C (2.7 F) degree increase in global climate. https://earth.stanford.edu/news/roadmap-reducing-greenhouse-gas-emissions-50-percent-2030#gs.uglikb Why is Los Angeles County going to take on the vast majority of the greenhouse gas emission reduction responsibility when San Bernardino, Riverside, and Orange Counties are making transportation improvements that will place us in a situation where we are "three steps forward, two steps back"? As the author of the Sustainable Communities Strategy, SCAG has a role in vetting these projects. While they may not be able to overturn the will of the outer county voters for locally funded freeway expansion, they can certainly highlight the project impacts to the region not meeting its RTP/SCS goals and impacts to air quality conformity, and not include these projects on the FTIP for federal funding eligibility.</p>	Thank you for your comments. Comments noted.
0001404.09	<p>From an environmental justice perspective, workshop and meeting locations must reach low income, Latino, and Black communities. SCAG had workshops in Joshua Tree, Victorville, Palmdale, and El Centro, which are low income and have a greater percentage of Latinos and Blacks than most cities in the region. SCAG did outreach in the Coachella Valley, holding a special meeting with EJ groups in that area. SCAG should also be commended for its partnerships with groups like ActiveSGV and People for Mobility Justice, which reach youth and Latino, Asian, and Black communities. However, more outreach should occur, particularly in heavily Latino areas like Southeast Los Angeles County which was neglected by SCAG in this cycle. SCAG should look at the demographics of the cities where meetings are and strive to hold workshops in areas that reflect the region's population. Through use of the voter file and email addresses (which most voters now provide when they register to vote), combined with demographic information from polling firms and organizations such as Political Data, it is possible to send email polls or invitations to comment to underrepresented demographics such as Spanish speakers, Blacks, renters, youth, etc. https://www.politicaldata.com/common-faqs While this would only reflect citizens registered to vote, it would still provide an added dimension of information that could be used in the next cycle development to get more feedback from those who are only mildly engaged with their government.</p>	<p>In this regional transportation plan cycle, SCAG worked with 18 community-based organizations (CBOs) across the region, to engage populations that have traditionally been underrepresented in formal planning. The CBOs engaged the public at approximately 30 events in early summer. This collaborative outreach strategy is aligned with SCAG's "Bottom-Up Local Input and Envisioning Process" for Connect SoCal, fulfilling the goal of engaging a "broad range of stakeholder groups" to "evaluate potential region-wide integrated land use and transportation planning strategies." As a result, SCAG also developed a Public Engagement guide to provide a model and recommendations for further engagement of CBOs and underrepresented populations for future regional transportation plan cycles. SCAG hosted two workshops in the area including Boyle Heights and Lakewood. Concurrently, SCAG held a series of 28 open house-style workshops, a telephone town hall, and a survey offered in 17 languages to gather input from the public. Telephone town hall technology allowed SCAG to reach to over 30,000 phone numbers provided through voter files. SCAG continues to assess better ways to provide information and outreach to the public.</p>

ID	Comment	Response
<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.10	<p>In the 2016 RTP/SCS cycle, there was a controversy regarding SCAG releasing subjurisdictional growth forecast information to Climate Resolve. Climate Resolve claimed that elected officials on the SCAG board would "pull strings" on SCAG staff in order to get information to challenge Caltrans' analysis of the High Desert Corridor.</p> <p>http://scag.granicus.com/MetaViewer.php?view_id=9&clip_id=998&meta_id=19923SCAG created a "data distribution protocol" which required approval of jurisdictions in order to get subregional data.</p> <p>http://www.scag.ca.gov/committees/CommitteeDocLibrary/twg091516fullagn.pdf disagree with Climate Resolve and the signatories of the letter in the packet, which stated: "We recognize that some uses of data make agencies and other TWG members uncomfortable, but we also have to balance those concerns with the benefits of providing open access to data and information on our communities. Most of us are not engaged in political campaigns or using this data for nefarious purposes. In fact, many of us are 501(c)(3) organizations and expressly prohibited from engaging in political activities. Those of us in the nonprofit community are often on the outside of the planning process, and our real opportunity to influence the process comes on the back end when a plan is put out for review or a public workshop is conducted." Furthermore, the groups contrasted themselves with "neighborhood associations" which want subjurisdictional (traffic analysis zone) data. I do not understand their concern. Are they afraid that local agency staffers will get bombarded with questions about what TAZs are? Access to data is important for the public and interested parties to "fact check" SCAG's model and assumption, which became a point of contention in the RHNA process on "local input". Please describe the current data distribution protocol, both at the jurisdictional and subjurisdictional level, and indicate the number and type of non-governmental requests which have been made since the protocol was adopted in 2016.</p>	SCAG will review data sharing protocols following the adoption of Final Connect SoCal.
0001404.11	<p>The intent of the use of the data should never be a criteria. For a public records request, whether the information is intended for political use, for a "hit piece" by the news media, for a gadfly to bring it up at a council meeting, or for a nonprofit interested in solving climate change, it doesn't matter. The law requires that the information be provided. If a favored nonprofit like Climate Resolve can get the data, then an adversarial nonprofit like Toll Free IE must also be able to get the data. I recognize that subjurisdictional data may be SCAG generated and likely has never been approved by electeds, which makes it sensitive. But if the purpose is to provide inputs to the SCAG RTP, then it should ONLY be used for that purpose and not be used by ANYONE to model anything outside of the strict parameters of RTP/SCS and related plans. This is technical data that is hard to understand, but any random member of the public should have access to it, provided they acknowledge the disclaimer on Page 27 of the appendix, "TAZ level data or any data at a geography smaller than the jurisdictional level has been utilized to conduct required modeling analyses and is therefore advisory only and non-binding, given that sub-jurisdictional forecasts are not adopted as part of Connect SoCal. TAZ level data may be used by jurisdictions in local planning as they deem appropriate. There is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with Connect SoCal." If the modeling data SCAG generates at the subjurisdictional level is considered the jurisdiction's data, then SCAG and/or the jurisdictions must provide it equitably to all that ask for it, or else treat it as a draft work product, for internal use only.</p>	SCAG will review data sharing protocols following the adoption of Final Connect SoCal.

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<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.12	<p>Ideally, modeling data should be published on the SCAG open data web site, but as far as I can tell, even jurisdictional data is not available on the site (http://gisdata-scag.opendata.arcgis.com/search?groupIds=57ba7b0e494f400ebd1abb89ccee201f). It appears that some subjurisdictional data was published as "draft data books" on the *2016-2040* RTP web site, but that the final data with the local input was not published. At a whole jurisdictional level, the minimum information should be provided, on SCAG's open data website, similar to the Climate Resolve request but at a jurisdictional level, which should be noncontroversial as it was derived through the local input process directly from jurisdictions. From Climate Resolve's request form: Regional travel demand model filesa. Jurisdiction (TAZ) layer – TransCAD or shapefileb. Household and jobs by jurisdiction Exceli. baseline, all SCS scenarios modeledc. Network files – TransCADi. baseline, all SCS scenarios modeledd. Vehicle trip tables by time period – TransCADi. baseline, all SCS scenarios modelede. Assigned traffic volumes by time period – TransCADi. baseline, all SCS scenarios modeledOr will I have to sign a data protocol agreement for jurisdictional data too?</p>	<p>SCAG will review data sharing protocols following the adoption of Final Connect SoCal.</p>
0001404.13.1.1	<p>In 2016 RTP/SCS comments, I noted: "MAP-21 calls for "reliability" as a measurement. In addition to traditional highway system reliability (i.e. travel time), transit reliability is important. Metrolink on time performance is dropping. LACMTA's on time performance goal for buses is 80% and is usually not met. Reliability is especially important for low wage workers who have shift-based schedules that require showing up on time to help customers or manufacture products. Poor reliability impacts people shifting trips to transit, since they perceive that a car trip is more reliable, especially if transfers are involved. Policies such as dedicated bus lanes, smart cards, and off board fare payment can improve reliability."</p>	<p>As indicated in your comment, travel time reliability is one of the federally designated performance measures provided for under MAP-21. The MAP-21 travel time reliability metrics include the percentage of person-miles traveled on both Interstate and non-interstate National Highway System roadways that feature observed travel times that are considered 'reliable'. MAP-21 also includes a travel time reliability metric for freight movement which measures the percentage of Interstate mileage that is considered 'reliable' for truck travel. While the federally defined travel reliability performance measures do not extend to the transit system, MAP-21 does include performance reporting requirements for Transit Asset Management and Transit System Safety. Please see the 'MAP-21 System Performance Report', included in the Performance Measures Technical Report, for more details regarding federal performance management requirements. In addition to the MAP-21 measures, Connect SoCal features several metrics to assess performance of our regional transit system, including transit mode share, transit boardings per capita, and transit travel time distribution. Please see the Final Transit Technical Report for more information regarding transit system performance in the SCAG region.</p>
0001404.13.1.2	<p>SCAG notes in Connect SoCal, "Each transit agency must make its safety performance targets available to MPOs to assist in the planning process, and coordinate to the maximum extent practicable with the MPO in the selection of regional safety targets. The Final Rule will not take effect until after Connect SoCal is formally adopted. The 2024 RTP/SCS will be the first plan update to comply with this mandate.</p>	<p>The Final Connect SoCal will include the federally required safety targets for the SCAG region.</p>

ID	Comment	Response
<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.13.2	While this is true, there are plenty of maps showing highway reliability improvements, but none on transit travel time. While transit reliability is a component of many factors, including labor availability, traffic congestion, state of good repair on rail, etc., it should be a goal of all transit systems to increase reliability. This means greater on time performance, reduced unscheduled maintenance, and proper labor availability to ensure all scheduled trips are covered. SCAG should, with input of local transit providers, set these goals for reliability, as that is an important factor for people to choose transit over driving on unmanaged, congested roadways. I suggest the use of on time performance, early trips (leaving one minute or more before scheduled departure time), miles between service calls, and percent of scheduled trips operated as criteria which could be gauged and compared between major operators in the region, and over time.	Comment noted. System reliability is one of the four safety-related performance measures identified by the Federal Transit Administration (FTA) in the National Public Transportation Safety Plan, and operators must develop and report on performance measures including reliability as part of their Public Transportation Agency Safety Plan. SCAG must in turn develop regional performance measures including for system reliability which will be incorporated into the next update of the plan.
0001404.14.1	While there is a robust discussion of passenger rail and aviation in their respective sections, there is little discussion about the role intercity bus plays in reducing greenhouse gas emissions and as an alternative to planes and trains for medium distance travel. Southern California has a wide variety of intercity bus service, from longtime incumbents Greyhound and Megabus, to new entrants such as Flixbus, special intercity service such as the several companies operating between Las Vegas and Los Angeles or the Coachella Valley and Mexicali, and services tailored to ethnic groups like the Vietnamese operated service (Xe Do Hoang) from Orange County to the Bay Area, or El Paso-Los Angeles Limousine catering to Latinos in the I-10 market. In addition, recent legislation will open some Amtrak buses to regional traffic, and the San Joaquin JPA has recently obtained approval to pick up local passengers in the SCAG region along the Santa Barbara - Oxnard - Bakersfield and Bakersfield - Lancaster - Victorville routes.	The Passenger Rail Technical Report discusses the important role provided by private intercity bus operators in the SCAG region.
0001404.14.2	A brief treatment should be included in Connect SoCal, and further expanded in future RTP/SCSs, ideally with the passenger rail section as it functions complementarily to it. Public transit is now also providing interregional connections. For instance, Kern Transit now operates several trips every weekday between Bakersfield and Santa Clarita, connecting that growing region with the LA Metro. Same with the newly expanded all day RTA CommuterLink from Escondido to Temecula, with express bus connections to San Diego, Riverside and Corona; SunBus between Riverside and the Coachella Valley; and Coastal Express running seven days a week to Santa Barbara from Oxnard.	The Final Connect SoCal and the Passenger Rail Technical Report discuss the importance and benefits of increasing connectivity between public transit systems and passenger rail, and public transit in general.
0001404.14.3	Transit agencies could do better to integrate their services with intercity bus much like they do intercity rail. Many companies like Greyhound are selling their stations, and local transit agencies should accommodate them, much like Megabus serves Union Station directly.	The Passenger Rail Technical Report discusses the importance and benefits of increasing connectivity between public transit systems and private intercity bus operators.
0001404.14.4	Cities should also not discourage casino buses from stopping in their communities, or using park and rides. These services are no different than vanpools, except they carry a less regular clientele. They reduce thousands of trips a day region wide and receive no government subsidy but are discriminated against by some cities, some because they have their own casinos, or others because of alleged passenger issues which could be handled (i.e. street parking, littering) without banning this valuable form of transit.	Comment noted. Local jurisdictions have authority to determine use of their publicly owned rights-of-way. Through a forthcoming study on curb space management, SCAG will seek to promote regional coordination and consistency where possible to encourage and support sustainable modes of travel, manage congestion, and reduce greenhouse gas emissions.

ID	Comment	Response
<i>Submitted by</i>	Fung, Henry	Submittal 0001404 Related Documents Link
0001404.15.1	In the 2012 RTP/SCS, I had noted about considering making the truck only lanes “green lanes” for clean fuel and low emission trucks. This should be considered in any studies.	Truck-only lanes add capacity in congested corridors and improve truck operations and safety by separating trucks and autos. They also provide a platform for the introduction and adoption of zero- and near zero-emission technologies. SCAG continues to explore the potential of such a system along the SR-60 corridor. SCAG sees truck-only lanes as one catalyst for the use of zero- and near zero-emission truck technologies, improving air quality for communities near the corridor and throughout the region. This is discussed at a high level under the section referencing incentives for clean technologies into infrastructure planning in the Agency and Partner Roles and Responsibilities for Action section of the Goods Movement Technical Report. SCAG will continue to support strategies that advance the use of zero- and near zero-emission where feasible.
0001404.15.2	Also, electrification of freight rail, while currently not funded in the short term, is a strategic long term improvement that should be strongly considered for implementation. This has the potential of eliminating a significant amount of emissions from diesel locomotives.	SCAG agrees that the region needs to move to cleaner modes of freight transportation and will continue to advance strategies that reduce emissions in all modes.
0001404.15.3	I am encouraged that SCAG has placed a more detailed discussion of the benefits and risks to freight rail electrification in the report. The report is informative in highlighting development of clean energy trucks and transport at the Ports of Los Angeles and Long Beach, but more clean trucks and trains are needed.	SCAG agrees that the region needs to move to cleaner modes of freight transportation and will continue to advance strategies that reduce emissions in all modes.
0001404.15.4	Goods movement should also discuss AQMD’s role in managing emissions at the port, and efforts made to reduce the use of dirty ship fuel when at or near port, which negatively affects nearby communities.	Some of the work that the South Coast Air Quality Management District (AQMD) is doing to reduce emissions at the port has been mentioned, both in terms of work being done under a Memorandum of Understanding to reduce emissions at the ports, and also through several demonstration projects that AQMD is doing in partnership with the ports. Efforts to reduce emissions from ocean going vessels are certainly important and supported by SCAG. However, vessels are beyond the scope of this plan.
0001404.15.5	While Connect SoCal continues to include the East West Freight Corridor as a long term strategy, I believe that further study, the continued buildout of the ACE program in the San Gabriel Valley, and the lack of connectivity with the Metro Board approved I-710 corridor alignment (never mind the lack of funding) will determine that new truck lanes, on an elevated or tunnel structure, through built out areas are not feasible. Even with 100% clean trucks, the construction impacts, noise, etc. for a truck freeway when there is existing rail right of way which could be better used (both in the SGV and on the BNSF alignment) makes it a poor option. I urge SCAG to wrap up these studies and, if appropriate, discuss with the Regional Council to remove this sword of Damocles from the 2024 RTP/SCS.	The 2016 RTP/SCS included a system of truck-only lanes connecting key trade gateways at the San Pedro Bay Ports and industrial cluster areas in Los Angeles and the Inland Empire. However, in March 2018, the Metro Board of Directors selected Alternative 5C as the Locally Preferred Alternative (LPA) for the I-710 Corridor Project. This alternative reduced the extent of the truck only lanes of the project, terminating at Del Amo Boulevard, south of SR-91. SCAG is open to the exploration of alternatives that reduce congestion and harmful emissions for the movement of goods on east-west highways in the region. It is important to note that SCAG strongly supports the work being performed by the San Gabriel Valley Council of Governments on the Alameda Corridor (ACE) initiative. However, even with a fully completed portfolio of ACE projects, market forces will still demand the use of trucks on regional east-west corridors. In addition, it is impossible for all east-west freight movement to completely shift to rail for numerous reasons ranging from lack of access of private businesses to rail to first mile/last mile needs. The region remains focused on developing innovative strategies and solutions towards project concepts which can address growing truck traffic and safety issues on core highways throughout the region, serving key goods movement industries. This includes a continued focus with developments related to near-zero and zero emission technologies.

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<div style="display: flex; justify-content: space-between; align-items: center;"> <i>Submitted by</i> Fung, Henry Submittal 0001404 Related Documents Link </div>		
0001404.17	<p>Historically, SCAG has felt more comfortable in a coordination and facilitation role. Recently, former SCAG President Alan Wapner said at a meeting that one of the values of SCAG is local input. While I appreciate that local input is important, simply compiling everyone's opinion may not be what is necessary to meet today's challenges of climate change, housing insecurity, and stagnant transportation safety. SCAG needs to take on a more robust role, lead rather than follow, and be bold, much like the former SCAG Executive Director is doing in his new position in San Diego at SANDAG. There are simple ways where SCAG can make its voice heard regionally, to help improve our region's compliance with state and federal mandates. SCAG has facilitated in many cross-jurisdictional capital studies, like the West Santa Ana Branch, I-10 LA-SB Corridor, and Norwalk Green Line Extension studies. But it could also look into operational coordination. For example, my parents live in Pomona, in Los Angeles County, and do not drive. Yet there is no single means of payment between Los Angeles, San Bernardino, and Orange Counties. They would have to have one fare card (the TAP card) and two apps (OCTA and Omnitrans) to pay without cash. Transfers are not accepted except at fixed locations, making short trips expensive even for seniors. Rather than ad hoc between agencies, facilitate studies between CTCs for operational concerns, because what happens there affects our region, and people travel past county lines all the time. Similarly, Omnitrans (San Bernardino County's transit system) doesn't operate six days out of the year. Many low income workers have to work on days like Thanksgiving, New Years Day, and Memorial Day, and families who would like to go to a Labor Day picnic or Fourth of July fireworks are forced to find another ride or stay home. Some give up on transit and choose to buy a car, which results in greater pollution, greenhouse gas emissions, and congestion. This affects RTP/SCS goals and makes it harder to meet SB 375 targets. SCAG could use its pulpit to encourage agencies to adopt transit service standards regarding span of service and days of operation, and publicize those that don't. They could encourage Cal-ITP to come up with universal payment standards.</p>	<p>Thank you for your comments. Your suggestions may be considered in future plan updates.</p>
0001404.18	<p>Regarding plan development, I agree with several Regional Council members that more robust discussion was needed on areas like transportation finance, high speed rail, and making transportation improvements correlate with housing growth. This process needs to start in 2022, once the housing elements are in from RHNA, to fully allow for this dialogue.</p> <p>Unfortunately, per the discussion at the November SCAG Regional Council meeting, there is a need to adopt this document quickly in order to maintain air quality conformity prior to the EPA deadline. I do hope that these changes can be incorporated, either in this draft, or in 2024 RTP/SCS development. Thank you for considering these comments.</p>	<p>Thank you for your comments. Comments noted.</p>
<div style="display: flex; justify-content: space-between; align-items: center;"> <i>Submitted by</i> Garcia, Ivan Submittal 0001313 Related Documents </div>		
0001313.01	<p>Build 4 to 5 lane freeways with stop lights at every on ramp. Stop lights on every freeway on ramp will slow down traffic build up.</p>	<p>Ramp metering can be a powerful tool to manage the flow of additional vehicles onto the freeway corridor, and is a key element of Integrated Corridor Management, a strategy included in Connect SoCal. The number of lanes on any given freeway segment is determined through context-sensitive design reflecting existing and projected traffic volumes, available right-of-way, and a comprehensive planning process that includes public input and participation.</p>

ID	Comment	Response
<i>Submitted by</i>	Garcia, Ivan	Submittal 0001314 Related Documents
0001314.01	Please provide status on all upcoming transportation project list.	Comment noted. Projects in the Project List Technical Report do not provide a status field other than completion year for planned projects. Please contact the project lead agency or the related county transportation commission to identify a project's status.
<i>Submitted by</i>	Garlan, Michael	Submittal 0001307 Related Documents
0001307.01	At the September 2018 Metro Board meeting two alternatives for extending the Green Line to Torrance were approved for further study. Alternative 1 (along the Railroad Right of Way) and Alternative 3 (along Hawthorne Blvd). Additionally Board Member Hahn, Major Butts, and Major Garcetti expressed a desire to study under-grounding and grade-separating both options. I would like to know when that study will be started as I have not seen any information about when that study will begin. Could you please provide any information you have on the schedule to the public? Thank you.	The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects including the Green Line Extension to Torrance. More information can be found on the Metro's website . Inquiries and comments regarding Metro's current environmental review process should be directed to the Metro project manager.
0001307.02	Of the two options being considered for the Green Line Extension to Torrance I am strongly opposed to option 1 as it would have too many negative impacts on not only the residences in both Lawndale and Redondo Beach along the the Rail Right of Way but both cities at large. I am particularly concerned about the planned at grade crossings in option 1. I have personally observed several at grade crossings along the Gold Line and the noise generated by the horns, bells and the trains themselves is unacceptably loud. I am also concerned about the financial impacts on the two cities affected, the increase in crime and the safety of the petroleum pipelines located under the ROW. Please consider and approve option 3 down Hawthorne Blvd. as it would have the least negative impacts and at the same time be more of an asset to the businesses along Hawthorne Blvd. Historically the Red Car used to run down the center of Hawthorne Blvd. The return of rail transit there would certainly revitalize that corridor. Thank you.	The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects including the Green Line Extension to Torrance. More information can be found on the Metro's website . Inquiries and comments regarding Metro's current environmental review process should be directed to the Metro project manager.

ID	Comment	Response
<i>Submitted by</i>	Jaiswal, Anna	Submittal 0001282 Related Documents
0001282.01	<p>We need a holistic “complete streets” approach to road design in the region. Although “complete streets” ideas are discussed in the plan, the solutions keep pointing back to competing for ATP funding to design and build separate pedestrian or bicycle projects (see “Complete Streets” box, Chapter 3, pager 71). But there is little discussion of the design process for highway projects. A regional policy with teeth is needed to ensure that any roadway project being funded in SCAG’s FTIP goes through an appropriate complete streets review and input process. This should include a requirement that design of any roadway, arterial, or interchange project involve a real attempt at public involvement starting early in the conceptual design, environmental, and alternatives analysis process. Often despite the best efforts of informed, active citizens, it seems impossible to find out about public hearings before they occur for the design of large highway projects. And when I do make comments on EIRs, the response is usually “no, that will make the project more expensive” or “no, sidewalks or bike lanes won’t fit because we need to fit more cars through.” Several freeway interchange projects in the last few years in San Bernardino County have removed sidewalk in one direction in order to add another lane for cars. Pedestrians and bicyclists continue to die in record numbers. SCAG should place a requirement on every funded project that the design must give real consideration to the safety of all roadway users, and make a real attempt at meaningful public engagement. This should include a Citizens’ Advisory Committee of people who walk and ride bikes and ride transit on a regular basis who can give input from their perspective of what would make them safer, and can spread the word about public meetings or engagement opportunities. Information needs to be put out on Facebook and email listservs where people will see it so they can provide comments early in the design process before the design decisions have been made. The Project List document is full of capital improvement projects to widen roadways in San Bernardino County. If a true “complete streets” approach is taken on these projects, it will help make our County a safer place to walk and bike.</p>	<p>Thank you for your comment. The Implementation Strategies section of the Active Transportation Technical Report outlines strategies and actions that SCAG will undertake to encourage the implementation of Complete Streets throughout the region. SCAG does not have the authority to place requirements on every funded project. However, we are committed to working work with local, state and federal partners in implementing the Active Transportation component Connect SoCal with a focus on Complete Streets. Additionally, SCAG supports and champions a robust and meaningful approach to public engagement through the Go Human campaign as well as through requirements in SCAG-funded programs. Language has been added to both the Technical Report and the main book of Connect SoCal to make clear SCAG’s recommendation that Complete Streets be implemented on all non-limited-access streets in the region.</p>
0001282.02	<p>In the Technical Report on Transit, the conclusion (page 79) seems to focus on “technology and innovation” as well as capital expenditures and rail expansion as the solutions to improving public transit ridership. Almost nothing is mentioned about finding increased funding to increase frequency and expand hours for public transit service (the backbone bus service that carries most of the riders). Frequency and expanded hours are what public transit riders most often ask for and say would enable them to ride transit more (according to the TransitCenter Who’s on Board 2019: How to Win Back America’s Transit Riders report cited in the Technical Report), and so these are critical to attracting ridership on public transit.</p>	<p>Connect SoCal identifies significant investment across all transit modes, including increased transit service levels supported by \$173.9 billion in operations and maintenance investment and \$66.8 billion in capital projects, as described in Chapter 3 of the Final Connect SoCal.</p>

ID	Comment	Response
<i>Submitted by</i> Kahn, Mitchel		
0001322.01	It is essential that 118 be improved and widened to 4 lanes regardless of the neighboring property owners. It can include a tollway lane to keep traffic at a minimum. Or, the second lane can be limited to electric, hydrogen or other non polluting vehicles. Even trucks have and will continue to become greener and qualify for entry. But, the locals have to cooperate by buying, leasing or converting farm implements as well. The concern of the neighbors is not greenness but increased traffic and pressure for growth. That is a control within the power of the BoS if it wants to exert it. It's up to the locals to make sure that the right elected people are up to the job.	Comment noted.
<i>Submitted by</i> Kwast, Meghan		
0001321.01	I strongly disagree with the plan to add HOV lanes between Moorpark and SR-33. I travel between Ventura and Thousand Oaks each day, and I am a single-passenger vehicle. I have no other coworkers who work my schedule or travel the same distance. I travel this way because I have no choice. I have no option for carpool (even using several apps) and using public transit would turn my 30-70 minute drive one-way into 90 minutes one-way minimum daily. My spouse also works and already uses public transit to go up to Santa Barbara. The rail system is highly inconsistent and late, so that does me no good. HOV lanes lead to added congestion for the rest of us who have no other options. That's time I'm using up extra gas, time I'm having to pay for extra child care, and time that's chipping away at my mental health. HOV lanes are not going to solve the problem of reducing cars on the road. You need to focus on improving public transit between Ventura and Moorpark that is RELIABLE. The addition of an HOV lane north of Ventura has had disastrous results. Please put our money where we truly need it. Focus on creating more reliable and diverse commuting methods.	Comment noted. Connect SoCal emphasizes robust multimodal investments throughout the regional system.
<i>Submitted by</i> Norman, Marven		
0001522.01	Connect SoCal PlanPage 9: The Goals need to be re-ordered. It would be great for current #6 to move to the top spot and #1 to move down quite a bit.	Comment noted. An extensive process engaging stakeholders, SCAG's policy committees as well as the SCAG Regional Council over an extended period was utilized in finalizing the goals. Any changes to the goals in future update cycles will need to go through similar process.
0001522.02	<ul style="list-style-type: none"> Page 129: Outcome 2 lacks measures for active transportation delay. 	Thank you for taking the time to review and comment on the draft Connect SoCal. Connect SoCal prioritizes the planning and implementation of an enhanced regional active transportation system, including more and better bicycle and pedestrian infrastructure, safety improvements, and the provision of amenities to produce an improved walking and biking environment throughout the SCAG region. While active transportation delay is not among the performance measures used to evaluate Connect SoCal, we do include several metrics intended to monitor progress being made in the use and safety of our regional active transportation system, including measures for active transportation mode share, safety, and daily per capita amount of walking and biking. In the future, as new, reliable data resources become available to support the improved monitoring of our active transportation system, additional measures may be incorporated into SCAG's on-going performance monitoring program.

ID	Comment	Response
<i>Submitted by</i>	Norman, Marven	Submittal 0001522 Related Documents Link
0001522.03	<ul style="list-style-type: none"> Page 138: plan has too much business-as-usual to reasonably expect to meet GHG Emissions Reduction targets and electrification shouldn't be seen as the magical panacea that will waltz into town over the next decade to cure the problem of relying too much on cars. 	<p>Thank you for your comment. The reduction of regional GHG emissions is among the highest priorities of Connect SoCal. While focusing on any singular strategy for reducing GHG would be insufficient for meeting our targets, the integrated program of projects, plans, and strategies contained within the Plan provide a solid foundation for making significant progress toward achievement of our regional goals, including GHG reduction.</p>
0001522.04	<p>- Page 8: There might be decisions to be made about phasing as we retrofit the legacy of the existing environment, but the expectation needs to be that bicycle and pedestrian infrastructure will be at a minimum, built everywhere roads are paved.</p>	<p>Thank you for your comment. The Implementation Strategies section of the Active Transportation Technical Report outlines strategies and actions that SCAG will undertake to encourage the implementation of Complete Streets throughout the region. SCAG does not have the authority to place requirements on every funded project. However, we are committed to working with local, state and federal partners in implementing the Active Transportation component of Connect SoCal with a focus on Complete Streets. SCAG supports an approach that would make complete streets treatments a default unless deemed truly impractical. Additionally, SCAG supports and champions a robust and meaningful approach to public engagement through the Go Human campaign as well as through requirements in SCAG-funded programs.</p> <p>Language has been added to both the Technical Report and the main book of Connect SoCal to make clear SCAG's recommendation that Complete Streets be implemented on all non-limited-access streets in the region.</p>
0001522.05	<p>- Page 13: Gentrification concerns are real, but they arise due to an absolute dearth of quality active transportation infrastructure in essentially the entire SCAG region. Thus, the construction of any amenities are unfortunately also going to be likely to attract people who can afford to spend more on housing and to the extent that it also allows them to reduce car use and free up household cashflow, that can find its way into the local economy, giving it a boost. However, especially given the safety issues, we cannot let fears of gentrification dominate the ability to provide safety improvements via improved bicycle and pedestrian infrastructure and indeed, research by Lusk et al. has identified that residents of lower-income communities are still quite interested in high-quality bike facilities. Instead, it makes it even more important to make 1 them basic expectations by including them in all standard plans for new build and refurbishments as well as prioritizing expanding the networks of the provisions as fast as possible to lessen the potential for any one neighborhood or community bearing the brunt of the changes in a particular area.</p>	<p>Thank you for your comment. Additional discussion about gentrification and displacement related to active transportation improvements has been added to the Regional Significance chapter of the Active Transportation Technical Report.</p>

ID	Comment	Response
<i>Submitted by</i>	Norman, Marven	Submittal 0001522 Related Documents Link
0001522.06	<p>- Page 14- GoHuman is an invaluable tool for improving Public Opinion and should receive more funding to be able to do more events to help showcase both short-term and more permanent investments. However, as mentioned in the comments on gentrification, there is a need to move beyond small pilots both to avoid gentrification concerns as well as to maximize the potential by way of expanding improvements to be within reach of more communities.- Given the lack of funding, what is available needs to be directed to where it will provide the maximum impact. That makes it absolutely essential to provide best practice accommodation for bicyclists and pedestrians in standards to make them a routine part of ongoing projects. That also could help address Public Opinion by changing the framing of the situation. There will not be controversy at all over something that has existed from the beginning.</p>	<p>Thank you for your comment. SCAG's Go Human program has proven to be a successful tool to engage historically disenfranchised communities and bring diverse voices into the planning process. SCAG is continuing the Go Human program through implementation of Connect SoCal and leveraging grants to build and expand the program. To move beyond short-term demonstrations, SCAG has initiated Quick Build demonstration projects, which are long-term infrastructure demonstrations, typically lasting between six months to one year. Quick Build projects allow communities to have meaningful engagement and provide an opportunity for cities to test infrastructure designs prior to construction. SCAG has also developed the Kit of Parts program, a demonstration materials toolkit, which expands the reach of the Go Human program and provides jurisdictions a low cost, easy way to demonstrate active transportation infrastructure and build support for safety improvements. SCAG supports leveraging funding to ensure funds support communities with a demonstrated need. SCAG's Sustainable Communities Program (SCP) allows SCAG to offer technical assistance to diverse jurisdictions across the region. The competitive application process includes factors such as disadvantaged community status, bicycle/pedestrian collision data, project need, and public health benefits, allowing the funds to support jurisdictions with the most need. Since the inception of the program in 2016, SCAG has prioritized funding to help advance active transportation projects towards implementation.</p>
0001522.07	<p>- Page 24: Cost Assumptions & Mode Shift should look at national and international guidance and experiences as well as take a clear-eyed approach to the topic. Many of the current bike facilities in the region are simply not on par with best practices of even yesteryear in places that have substantially more ridership. In addition, a number of studies have identified the potential improvements that would come from including world-class infrastructure, particularly when done to form entire networks to connect to destinations and transit. That literature should be reviewed to identify the true 23 potential for better investments based on the completeness of networks (including by filling in critical gaps) and by building the infrastructure itself to higher standards (e.g. a six-foot bike lane next to a multilane arterial is NOT best-practice).</p>	<p>Thank you for your comment. The cost assumptions literature review completed for Connect SoCal focused on projects completed in California to obtain the most locally-accurate cost estimates. Literature review related to anticipated mode shift which included research on both national and international best practice. Additional details can be found in the Modeling Methodology section of the AT Technical Report.</p>
0001522.08	<p>- Page 31: As noted above, additional research by Lusk et al. has identified that there is great interest for improved bike facilities in low(er)-income communities, the same communities that Connect SoCal already notes are more likely to have people biking even as they're also less safe. These facts should be leaned on more heavily, not in a patronizing way, but to impart the importance of making the changes necessary to support riders. That ultimately is a point directly related to the next section on Environmental Justice.</p>	<p>Reference to Lusk et al. study has been added in the Active Transportation Technical Report.</p>
0001522.09	<p>- Page 44: A discussion about Class III bikeways being part of the total needs to be had because the classification is too ambiguous and a number of jurisdictions simply use it as an excuse to not do anything meaningful and they remain high-stress environments under the LTS system developed by Furth referenced elsewhere in the document.</p>	<p>Thank you for your comment. This section has been edited to include the total number of Class I, II and IV Bikeways, with Class III Bikeways addressed separately. Additionally, language has been added to the Class III Bikeway discussion stating that this facility is not recommended.</p>

ID	Comment	Response
<i>Submitted by</i>	Norman, Marven	Submittal 0001522 Related Documents Link
0001522.10	- Page 51: Broadly speaking, micromobility is best served by what is traditionally known as bike infrastructure. However, legal definitions mean that use by those modes is technically illegal because certain facilities are defined as being for the exclusive use of bicycles. Nevertheless, the bike facilities are still the best place for most of them to be used, but they do underscore the importance of adequate designs for bikeways, something which has not necessarily been anywhere close to truly taken to heart in the region in all but a scant few projects.	Thank you for your comment. The California Vehicle Code 2130 permits e-scooters to ride in bike facilities including bike lanes, trails, and other pathways designed for bicyclists. However, according to the CVC 2130, local jurisdictions have the authority to restrict e-scooters and other micromobility devices from riding in bike facilities. SCAG encourages the safe use of micromobility devices across the region, and often the safest way for people to use micromobility devices is to ride on bike facilities. However, if a local jurisdiction does not allow e-scooters or other micromobility devices to access bike facilities, then users must comply with these local laws. SCAG supports the implementation of multi-modal infrastructure throughout the region and supports the design of traditional-bicycle facilities to be used for bicycles as well as new micro-mobility modes.
0001522.11	- Page 59: It's encouraging to see that the Local Bikeway Infrastructure component recognizes that big changes will be necessary in some areas and the four Strategies listed will if followed, all be influential in creating the positive changes necessary. However, an additional Strategy is needed to ensure that any and all new-build developments are built to avoid the need for retrofits in the first place. Such a Strategy needs to emphasize providing direct connections to transit, including with parking at transit stops and stations, and local destinations as well as laying out an integrated network as part of the initial planning and design of all greenfield and large-scale brown-/greyfield projects in the region.	Thank you for your comment. Language has been added to the Active Transportation Technical Report to include a recommendation that facilities be built to best-practice standards wherever feasible.
0001522.12	- Page 60: Though called "first-last mile," it should be acknowledged that with bikes and especially e-mobility devices, that distance can reasonably and easily be extended to be several miles. Thus, it would be helpful to identify a FLM Infrastructure Strategy to target bike infrastructure to an increased radius around stations beyond a single mile and place priority on making sure it offers users as few necessary stops as possible.	Thank you for your comment. While the strategy is titled First-Last Mile Infrastructure, the text of the strategy does note that improvements should be made to active transportation conditions up to three miles from a transit station or stop.
0001522.13	- Page 63: Complete Streets Strategies need to place a focus on making sure that the plans include defined and recognized low-stress facilities and networks.	Thank you for your comment. Language has been added to the Complete Streets Strategies section to include a recommendation for low-stress facilities and networks.
0001522.14	- Page 69: Table 11 lists changes under Connect SoCal that are appallingly anemic. Research from London's work shows that even in suburban areas, changes can have broad impacts and substantially increase walking and biking.	Thank you for your comment. The Plan outcomes are inclusive of the entire region (urban, suburban, and rural). We would expect outcomes to vary throughout the region. That said, SCAG supports active transportation projects throughout the region and Connect SoCal makes improvement over the baseline which would see mode share reductions compared with 2016 (base year) mode share in the region.
0001522.15	- Page 82: Table 12, Colton has completed their ATP.	Thank you for your comment. Table 12 will be updated to reflect the Colton ATP.
0001522.16	- Page 8: Section about KONT trails off mid-sentence.	Comment noted. The incomplete sentence, "As for air cargo, Ontario..." will be completed to read "As for air cargo, Ontario Airport cargo activity has been steadily increasing since the housing crisis of 2008, reaching 654,000 tons in 2017."

ID	Comment	Response
<p><i>Submitted by</i> Norman, Marven <i>Submittal</i> 0001522 Related Documents Link</p>		
0001522.17	- Page 34: There are additional opportunities to provide rail access to KONT that merit serious consideration. Those are described in my comments on the Passenger Rail Appendix below.	Comment noted. We will take note of the Ontario Airport rail access opportunities highlighted in your comments on the Passenger Rail Technical Report. Airport ground access improvement projects identified in the Connect SoCal for each of the regional airports are based on the most current information available to SCAG and were developed through consultation and collaboration with the concerned airport authorities and the County Transportation Commissions. SCAG regularly works with Metro, Metrolink, the Orange County Transportation Authority, and the San Bernardino County Transportation Authority, and other transportation commissions and agencies, on transit and rail connections to the airports.
0001522.18	Page 13: The regional express/HOT lane network is pathetically inadequate at present and the plans fall FAR short of what is needed. Every single limited-access highway in the entire region that has more than two travel lanes per direction should immediately have at least one (but preferably two if available) of the additional lanes converted to be HOT lanes, with the revenue being reinvested into maintenance needs, active transportation infrastructure, and transit service in the corridors. Doing so would be the single-most cost-effective measure possible to dramatically improve the congestion issues in the region while also greatly expanding the options available to people by filling critical funding gaps that currently exist for active transportation, transit, and even arterial/highway investments.	Comment noted. The Connect SoCal proposes significant expansion to the existing express lanes network supported by technical work and extensive coordination with the stakeholders. Further expansion of the network in the future plan update cycles should go through similar technical evaluation and stakeholder engagement process.
0001522.19	Pages 17 & 18: Performance results need to include delay incurred by bicyclists and pedestrians, particularly the impact that signal timing issues have on the latter group.	Comment noted.
0001522.20	- Page 7: The Thruway services mentioned in the Pacific Surfliner subsection can now (or will soon be possible to) be booked as standalone trips without a linking rail segment thanks to SB742 which Gov. Newsom signed into law last year.	Page 7 of the Passenger Rail Technical Report will be edited per the comment.
<p><i>Submitted by</i> Norman, Marven <i>Submittal</i> 0001523 Related Documents Link</p>		
0001523.01	Page 12: Metrolink should work with local partners to improve the bike parking at its stations	Thank you for your comment. Connect SoCal supports the implementation of bicycle facilities in the SCAG region, and increased funding for these improvements, including first/last mile connectivity to Metrolink stations. Connect SoCal programs \$17.7 billion for Active Transportation projects through the 2045 life of the plan. The Metrolink stations are owned by the cities in which they are located, with the exception of the stations in Riverside County which are owned by the Riverside County Transportation Commission.
0001523.02	- Page 20: SCRRRA section notes that “VCTC has one votes” which should presumably be singular.	Thank you for your comment. Page 20 of the Passenger Rail report will be edited per the comment.
0001523.03	- Page 24: The segment on the Metrolink San Bernardino Line is also true for the Metrolink Inland Empire/Orange County Line, so it should be mentioned as well.	Thank you for your comment. Page 24 of the Passenger Rail report will be edited per the comment.

ID	Comment	Response
<i>Submitted by</i>	Norman, Marven	Submittal 0001523 Related Documents Link
0001523.04	<p>- Page 27: Discussion of Los Angeles to Coachella Valley service needs to include planning to bridge the gap between the tracks into Redlands which will soon host Redlands Rail and the UP Yuma Subdivision. Doing so would allow passenger service from LA to the Coachella Valley to serve both Riverside and San Bernardino via the same trains as well as provide more direct service directly into LA via the agency-owned tracks of the San Bernardino Line. The most logical place to do so is likely along California Ave. on the border between Loma Linda and Redlands. The inclusion of a station in the vicinity of the Barton Rd./CA Ave. intersection would provide easy access to the community and be a valuable point for extending Omnitrans' sbX Green Line service from its current terminus at the VA hospital in Loma Linda, serving daily commuters traveling to Loma Linda University's campuses as well as into Redlands via the existing fixed-route services. This is an urgent and critical gap to fill to vastly improve transit service in the entirety of the SCAG region and beyond as it would be a natural part of the Southwest High-Speed Rail Network discussed on Page 28. Also, service beyond Indio into Imperial County should be considered. The new DMU options that are now available make it more realistic to serve that market and provide service all the way to Calexico using the existing right-of-way. UP will undoubtedly be a significant barrier and their single-tracked corridor of the Yuma Subdivision from east of Indio will be a problem for many opportunities to improve transit throughout the SCAG region, so a plan should be made to at a minimum, provide additional sidings and double-track through that area to mitigate their concerns.</p>	<p>Thank you for your comment. Connect SoCal supports establishing passenger rail service in un- and under-served markets. SCAG is an active partner with the Riverside County Transportation Commission (RCTC) and San Bernardino County Transportation Authority (SBCTA), who would be the lead agencies in planning, funding and implementing this service, in furthering these markets towards the implementation of passenger rail service. RCTC is the lead agency studying the feasibility and costs of a passenger rail service from downtown Los Angeles to Palm Springs and Indio (Coachella Valley Rail Service). Currently, RCTC is preparing a draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) analyzing potential route alignments and their environmental impacts and costs and benefits. Comments on alternatives should be directed to RCTC as lead agency.</p>
0001523.05	<p>- Page 28: Southwest High-Speed Rail Network would derive immense benefit from a "California Connector" to be constructed on the Loma Linda/Redlands border to bridge the gap between the UP Yuma Subdivision and the agency-owned tracks approximately a mile north which would provide expedited services and transfer opportunities to LA, Riverside, San Bernardino, and beyond.</p>	<p>Thank you for your comment. Connect SoCal supports establishing passenger rail service in un- and under-served markets. SCAG is an active partner with the Riverside County Transportation Commission and San Bernardino County Transportation Authority, who would be the lead agencies responsible for planning, funding, constructing and operating this service, in furthering this market towards the implementation of passenger rail service.</p>

ID	Comment	Response
<i>Submitted by</i> Norman, Marven		Submittal 0001523 Related Documents Link
0001523.06	<p>- Page 34: There is an opportunity directly east of Ontario Airport to provide a rail connection along Haven Ave. that would link the UP Alhambra Subdivision to the UP Los Angeles Subdivision. That would enable a reroute of the Riverside Line trains over that alignment and provide comparatively immediate relief to the current lack of any direct rail connection at the airport. It would also present the ability to provide residents living in downtown Ontario daily Metrolink service, a connection which they currently lack. Doing so would support the Transformative Communities grant that the City already received and is implementing by adding additional high-quality transit service. However, in the longer-term, rail service to ONT would be best provided by an entirely new Metrolink line. This San Gabriel Valley/KONT Line would leverage public investments in the Alameda Corridor-East program to provide a competitive running time for the service. An ideal routing would be via the UP Alhambra Subdivision with stops at the USC Keck School of Medicine Hospital complex, El Monte, which would provide transfer opportunities to the Metrolink San Bernardino Line, a Cal Poly Pomona station, Downtown Pomona, Downtown Ontario, and Ontario Airport. From there, the first option would be to continue to Riverside and on to Perris, but a second option would be to route some trains north to the existing San Bernardino Line tracks via either an existing siding by the Fontana Speedway, the UP Palmdale Subdivision, or the BNSF San Bernardino Subdivision through Colton. Exactly which of those three options is the best would be determined via further study, though it's perhaps worth noting that the latter option means that there could be another station that could be added in Colton.</p>	<p>Thank you for your comment. In 2018 SCAG concluded the Los Angeles-San Bernardino Intercounty Transit and Rail Connectivity Study, which specifically investigated establishing rail service to Ontario International Airport (ONT), including from the Metrolink Riverside and San Bernardino Lines, and from the Alhambra Subdivision, which is owned by Union Pacific Railroad. Connect SoCal includes a passenger rail service connecting ONT from the Metrolink San Bernardino Line. SCAG will continue to work with the San Bernardino County Transportation Authority and others to evaluate transportation solutions in this area.</p>
0001523.07	<p>- Exhibit 3: The marker for improvement #5 from Table 3 is misidentified as improvement #8 and nothing identifies the marker for improvement #8.</p>	<p>Table 3 and Exhibit 8 of the Passenger Rail Technical Report will be edited per the comment.</p>
0001523.08	<p>- Page 44: The opportunities for filling gaps and providing new service identified above would presumably need to be studied, but that should be done with haste.</p>	<p>Comment noted.</p>
<i>Submitted by</i> Osborne, Holly		Submittal 0001283 Related Documents
0001283.01	<p>The bottom line is that there are two Metro stations shown as planned on the Green Line extension to Torrance, which should not be there: 1) the Green Line Metro Station at Hawthorne/190th, and 2) the Green Line Metro Station at Manhattan Beach/Inglewood Ave. These two stations should be removed from both of the Maps (Exhibit 3.7, and 3.8) in your report.1) Regarding the Station at Hawthorne/190th. Metro came to the South Bay over a year ago and made numerous presentation from April-May 2018 on the Green Line, and this station was not on any map. I was surprised to find it on the interactive maps that have been sent out by SCAG (updated Jun. 2019.) I did find reference to it in an old 2017 So Cal Connected report, but bottom line: it has been removed.2) Regarding the Station at MB/Inglewood Ave. In the initial presentations by Metro in April-May 2018, there was a planned station at this location on the Redondo/Lawndale border. However, it is only 0.6 mile from the existing Redondo station on Marine, and deemed unnecessary by both Redondo and Lawndale This station was removed at the Sept 27, 2018 Metro board meeting.</p>	<p>SCAG has consulted with Metro regarding the proposed Green Line stations at Hawthorne/190th and Manhattan Beach/Inglewood Ave, and confirmed that the Metro Board has withdrawn those station locations from further consideration. The Final Connect SoCal will reflect this change and remove those stations from all appropriate exhibits.</p>

ID	Comment	Response
<p><i>Submitted by</i> Osborne, Holly Submittal 0001299 Related Documents</p>		
0001299.01	<p>Many of the tables are out of order or missing in Chapter 5. One example is "Table 5.2" which is referred to on page 131. but there is no Table 5.2. Another example is "table 5.3" referred to on page 137. There is no Table 5.3; but there is a Table 5.8, with a similar title. This whole chapter (Chapter 5) needs to be well scrubbed regarding figures and tables by an editor.</p>	<p>Thank you for your comments regarding Chapter 5 of Connect SoCal. Due to formatting constraints, some of the graphics are not able to fit on the same page as the reference. Tables 5.2 and 5.3 are included in the chapter and Table 5.8 is not included in chapter 5.</p>
0001299.02	<p>Table 3.1 lists selected Transit Capital Projects. One is the Green Line Extension to Torrance. There are actually 2 options that are going to be studied for that extension; I would like to know when that study is going to be started. (See Sept 27 2018 minutes of Metro Board for discussion of Option 1 and Option 3 for the Green Line extended.)</p>	<p>The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects including the Green Line Extension to Torrance. More information can be found on the Metro's website. Inquiries and comments regarding Metro's current environmental review process should be directed to the Metro project manager.</p>
0001299.03	<p>Although this is not discussed in Section 3, I want to know if there has been consideration of a Metro line following the 405 Freeway. I have seen writings in the newspaper saying it makes more sense to put a metro line on the Freeway, rather than adding another express lane, to get to the Valley. See Table 3.2 I am specifically talking about the Sepulveda Pass Transit Corridor.</p>	<p>The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects including the Sepulveda Pass Transit Corridor connecting the San Fernando Valley and the Westside. Metro is currently in the initial planning phases for this project and is evaluating a number of alternatives. More information can be found at www.metro.net.</p>
<p><i>Submitted by</i> Osborne, Holly Submittal 0001346 Related Documents Link</p>		
0001346.01	<p>1. On Exhibit 3.8 of the "Connect So Cal" there is a HQTAs map for 2045. (This comment also applies to any HQTAs map for 2016). There is a cemetery in the HQTAs area that should be "whited out" on the exhibit. Pacific Crest Cemetery is 16.93 acres, and all the details of the GIS is attached. (The cemetery is just east of Inglewood Ave.) The Redondo HQTAs acreage for 2016 was computed as 662 acres in an Appendix put out by SCAG. Subtracting out the cemetery will give amended acreage of 662-17 = 645 acres. (For 2045, this 17 acres would also need to be taken out, in addition to other changes that have been submitted.)</p>	<p>The Exhibit 3.8 HQTAs map is provided to depict a half-mile buffer around high quality transit corridors and major transit stops. Please note that for Regional Housing Needs Assessment (RHNA) purposes, HQTAs are assessed based on the population living within them, thus cemeteries within HQTAs would not generate any RHNA allocation.</p>
<p><i>Submitted by</i> Osborne, Holly Submittal 0001421 Related Documents</p>		
0001421.01	<p>Page 66, Table 3.1, Green line extension to Torrance Project (line 8 in table)1. The Green Line consists of two options: Option 1 down the ROW (right of way), and Option 3 down Hawthorne Boulevard. That should be mentioned in the table. (Both options are the same south of 190th)2. In addition, in the Sept 2018 Metro Board meeting, the Redondo Beach city council recommended that Option 3 (down Hawthorne Boulevard) be considered in an elevated position. Please make sure that the Option 3 study looks at both configurations: elevated or non-elevated. The elevated option has the advantage of not requiring street closures.</p>	<p>The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency responsible for the planning, design, construction and implementation of future Metro Rail projects including the Green Line Extension to Torrance. More information can be found on the Metro website. Inquiries and comments regarding Metro's current environmental review process should be directed to the Metro project manager.</p>

ID	Comment	Response
<p><i>Submitted by</i> Perdon, Albert Submittal 0001437 Related Documents</p>		
0001437.01	<p>SCAG has not sufficiently analyzed or documented the environmental impacts that will result from adoption of the current draft Program Environmental Impact Report (DRAFT) for the "Connect SoCal" 2020-2045 RTP (Regional Transportation Plan/Sustainable Communities Strategy). The reason is, the DRAFT does not take into adequate consideration the impacts that will result, both within and outside of SCAG's geographic boundaries, from implementation of the 2008 Proposition 1A bond (BOND) measure approved or not opposed by 74% of eligible voters. This measure and the law (LAW) it enacted mandates (1) quick construction of an 800-mile high-speed train (HST) system from Sacramento to San Diego and to San Francisco/Oakland, connecting and serving up to 24 new very high-density and largely auto-free new and improved cities (NEW CITIES) that are required to be planned, built and partially funded by the up to 24 NEW CITIES in coordination with the California High Speed Rail Authority, and (2) improvements to HST-connected transit systems and services of the CITIES, as defined in the LAW. SCAG cannot use as an excuse for skirting the requirements of CEQA/NEPA, that the cities, not SCAG, are responsible for and have exclusive authority over controlling land use. Exclusive land use authority within the HST station influence areas of the CITIES is overridden by the LAW</p>	<p>For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
<p><i>Submitted by</i> Reynaldo, Pilar Submittal 0001398 Related Documents</p>		
0001398.01	<p>It is time California lead by example. We must permanently ban single use plastic bags and bottles! Our parks, beaches, streets and air are choking on the massive amounts of plastic everywhere. We can not keep kicking the can down the road in hopes of everything correcting itself by a wish and a prayer. We humans are more resilient than the government believes, look at all the homeless who survive on the streets with out Medicine, shelter and care. We will all survive just fine and perhaps start to care if the commodity and ease of plastic is removed from our lives.</p>	<p>Comment noted.</p>
<p><i>Submitted by</i> Rotcher, Michael Submittal 0001323 Related Documents</p>		
0001323.01	<p>Historically, bus and rail lines have been cutback or eliminated if ridership does not meet expectations. I feel that this approach has been short-sighted. Riders will find other options if the entire trip as a whole is inconvenient in some way, i.e. connections do not line up efficiently, long waits, reduced hours, unavailable return schedules, etc. Further cutbacks/eliminations effect more connections, reducing ridership further, leading to more cutbacks, resulting in a death spiral. We need more lines, more frequent trips, longer hours of operation, and cheaper rates. When public transportation becomes faster, more convenient, and cheaper than driving, people will switch. If you build it, they will come.</p>	<p>Connect SoCal supports increasing connectivity, access, frequency and greater service hours for public transit. There are many transit providers in the SCAG region and any increase in transit service levels must go through the local transit provider planning and approval process, and requires securing funding for bus expansion vehicles and operations and maintenance.</p>

ID	Comment	Response
Submitted by Salveson, Don		
0001407.01	I have lived in LA Co my entire 66 years. I have been part of the growth in the greater San Gabriel valley and observed the masdive changes in Orange County. The one factor our govt does not address in CA is max population load. Building more housing and roads is not the answer. Our resources are maxed out. Time is up on pop growth. We must cap population increases. This is the only real answer. Over the past 20 years I have wittnessed the explosion og growth in the wesy San Fernando valley and south Ventura County. Traffic is a mess, street congestion is now a mess with everyone trying to get on/off the freeways. Water, sewer, trash and electrical rates are up. So is crime. There are just to many people now. Planning for massive increases makes no sense. The time is now to curb population growth in SoCal. We have reached our max carrying load.	Submittal 0001407 We encourage review of Table 3 of the Demographics and Growth Forecast Technical Report, which shows that anticipated population growth in the region from now until 2045 (0.61% annually) is lower than at any point in regional – or state history.
Submitted by Sandbrook, Richard		
0001389.01.1	i urge the powers that be to not fall into a progressive ideology that implements drastic changes to our state. California does not have to be the leader in outlandish new laws that restrict freedoms. A middle of the road approach will gain more favor than extremes to one side or the other.	Submittal 0001389 Comment noted.
0001389.01.2	on another note, I urge you to revisit the water district restrictions signed by Governor Brown before he left office. they appear to be unattainable and unrealistic, placing water restrictions on residential occupancies and not targeting agricultural water use which accounts for 80% of our state water use. make it fair and realistic.	Comment noted.
Submitted by Shepherd, Steven		
0001431.01	Implementing and improving pedestrian and bicycle infrastructure MUST be the #1 priority of any transportation plan.	Submittal 0001431 Comment noted. Investment in complete streets is a key component of Connect SoCal and is included as one of the six “Core Vision” centers in the Plan. The SCAG region has many diverse transportation needs and the Connect SoCal balances those needs with an eye towards creating a multi-modal and sustainable transportation network.
Submitted by Sisson, Jordan		
0001332.01	It would be great also if the public hearing slides be available.	Submittal 0001332 Comment noted. The presentation slides are available on the Connect SoCal website under Resources. Visit: www.connectsocial.org

ID	Comment	Response
<i>Submitted by</i> Sisson, Jordan Submittal 0001333 Related Documents		
0001333.01	<p>Regarding the plan's air passenger forecasting, it seems as if the passenger cargo compounded annual growth rate differs. I think the passenger is about 2.1. Cargo's about 3.5 over the entire planning horizon. For my quick review, it doesn't seem like it's really flushed out how it's justified between the two. Also, considering that in the last 17 years growth rate has been fairly consistent as compared to the last 7 years, which was impacted by 9/11 as well as the great recession. So I think that has to play an important role in terms of what is reasonably to be expected over this 27-year period.</p>	<p>Comment noted. The growth rates for passenger demand and cargo in the Connect SoCal were obtained from the 2018 Federal Aviation Administration (FAA) Terminal Area Forecast (TAF) and 2019 Aerospace Forecast, respectively. FAA uses different factors, variables, and methodology to calculate their passenger and cargo forecasts. The 2018 FAA TAF forecasts a 2.1% annual growth rate for passenger demand at the SCAG region commercial airports. In the "Comparing Growth Rates (Actual and Estimates)" subsection in the "Analytical Approach" section, you will find information on how the decision was made to adopt the 2018 FAA-TAF projected growth estimate (2.1 percent) for passenger enplanements at the seven commercial airports in the region. The 2019 FAA Aerospace forecasts a 3.3% growth rate for cargo. In the "SCAG Region Air Cargo Forecasts" subsection in the "Analytical Approach" section, you will find information clarifying how the Connect SoCal regional forecast was calculated using the 2019 Federal Aviation Administration (FAA) Aerospace Forecast. Please note that the RTP timeframe is 2020-2045, and the references to "2020-2040" will be corrected in the Final Connect SoCal.</p>
<i>Submitted by</i> Sisson, Jordan Submittal 0001334 Related Documents		
0001334.01	<p>You provide the various airports and what's the intended growth. While there is some explanation about the overall growth in passenger and cargo for the entire region, there's not that same level of specificity regarding the specific airports. Hopefully that's flushed out in the program EIR in the technical information. But as far as my quick review -- again, it just came out -- that's not really sufficiently made clear. So why is X amount of million going to this airport versus that airport? That needs to be cleared up.</p>	<p>Comment noted. For the Connect SoCal, SCAG staff did not calculate or assign the airport-level passenger forecasts to the airports. Rather, each airport provided SCAG with their individual long-term passenger forecast number, which was based on each airport's internal methodology, analysis, and planning. While the overall regional forecast for Connect SoCal was calculated using airport activity data and the Federal Aviation Administration Terminal Area Forecast growth rate for the airports in the region, the individual airport forecasts were developed by the airports and provided to SCAG. In the last paragraph in the section "Air Passenger Demand Forecast," you will find the following sentences: "The airport level forecasts, which were provided directly by the airports, are a reflection of many factors, including existing physical and institutional constraints at the airports, and individual projections conducted by the airports. In summary, the overall SCAG region forecast for 2045 of 197.14 MAP was calculated using the 2017 base year 110.17 MAP compounded at an annual growth rate of 2.1 percent, but the individual airport forecasts were provided directly by the airports".</p>
<i>Submitted by</i> Sisson, Jordan Submittal 0001335 Related Documents		
0001335.01	<p>It was great to see that your environmental justice area had performance metrics -- I believe you had about 18 of them -- however, it needs to be more flushed out. These are a very generic type of metrics.</p>	<p>Comment noted. Environmental Justice (EJ) performance targets are discussed in the Connect SoCal Chapter 5: Measuring Our Progress and the Performance Measures Technical Report to evaluate regional performance on matters of social equity and disproportionate impacts. Per applicable federal and state requirements, SCAG conducts an EJ analysis of whether implementation of Connect SoCal would result in disproportionate or adverse impacts on low income and minority populations in performance areas discussed in the EJ Technical Report. Due to the size of the SCAG region, the 18 EJ performance indicators address issues in most, if not all, jurisdictions in the region.</p>

ID	Comment	Response
<i>Submitted by</i>	Sisson, Jordan	Submittal 0001336 Related Documents

0001336.01 Meeting greenhouse gas targets is going to be a tremendous job to go from 8 percent, by 2020, below the 2005 levels to what our goal is in 2035, which is essentially 19 percent below 2005 levels. That's going to require far more aggressive, rigorous implementation on a project-by-project basis, at least from my perspective. To reach that, again, we're going to need, from the public's purview, much more specifics -concrete numbers that really demonstrate what you guys have modeled and whether or not a project really matches up. Under the existing plan, you know, I've probably reviewed over 200 projects in the last three years. And I can tell you, from my perspective, applicants and their public consultants look at vague, generic, aspirational goals in the current plan. Essentially if it's infill, it's good. It's consistent. That's it. Respectfully, that can't be it. There has to be a real clear kind of "what were the model assumptions?" And you guys are in a unique position, as the MPO, to provide some more detail. And whether projects in L.A., Glendale, Burbank, Commerce, or what have you, provide some more specifics on what your modeling

Thank you for your comments. Comments noted.

<i>Submitted by</i>	Sisson, Jordan	Submittal 0001337 Related Documents
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0001337.01 Private developers are going to look at the RTP/SCS and say, "What do I have to do?" If it's vague, if it's open ended, if it's aspirational, they don't have to do a whole lot. If you provide specifics -- detailed performance metrics. If you want to find consistency with this plan, this is what your project has to do. That is a way to require -- even though you guys are a facilitator, you guys are trying to guide. You guys don't have the authority to require certain lead agencies do certain controls.

Thank you for taking the time to review and comment on the draft Connect SoCal. The overall goals of the Plan are general in nature as they reflect a higher level vision of what Connect SoCal aspires to achieve within the SCAG region through its range of projects, programs, and strategies. However, Connect SoCal is very much a performance-based plan, equipped with specifically defined quantitative performance measures designed to evaluate performance of the Plan over a range of outcomes. Please see the Final Performance Measures Technical Report for detailed information on the metrics to be used to track performance of the Plan over time, and the Environmental Justice Technical Report on how the Plan performs in regard to ensuring social equity in its implementation. As indicated in your comment, SCAG does not have authority to implement local land use plans, sustainability strategies, or the projects featured in Connect SoCal. SCAG's role as regional facilitator requires an approach that relies less on specific local performance requirements and more on inter-agency collaboration and the provision of technical and policy guidance to promote progress toward achievement of the mutually defined regional performance objectives defined in Connect SoCal. Please see the Final Connect SoCal Program Environmental Impact Report (PEIR) for more information regarding mitigation measures.

ID	Comment	Response
<i>Submitted by</i>	Stephanie Johnson and Ghassan Roumani	Submittal 0001361 Related Documents Link
0001361.01	<p>Thank you for the opportunity to comment on the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Environmental Impact Report. The Plan states as its goals:</p> <ol style="list-style-type: none"> 1. Encourage regional economic prosperity and global competitiveness 2. Improve mobility, accessibility, reliability, and travel safety for people and goods 3. Enhance the preservation, security, and resilience of the regional transportation system 4. Increase person and goods movement and travel choices within the transportation system 5. Reduce greenhouse gas emissions and improve air quality 6. Support healthy and equitable communities 7. Adapt to a changing climate and support an integrated regional development pattern and transportation network 8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel 9. Encourage development of diverse housing types in areas that are supported by multiple transportation options 10. Promote conservation of natural and agricultural lands and restoration of habitats <p>While I agree that supporting healthy and equitable communities for all residents is an admirable goal, the Plan, does not address the possible or probable denigration of the quality of life for the residents of San Marino due to increased traffic.</p>	Comment noted.
0001361.02	<p>The stated environmental impact thresholds of significance include the following criteria and defers to local jurisdiction.</p> <p>3.17.3 ENVIRONMENTAL IMPACTS</p> <p>The impacts related to transportation, traffic and safety resulting from the implementation of the proposed project would be considered significant if they would exceed the following significance criteria, in accordance with Appendix G of the State CEQA Guidelines:</p> <ul style="list-style-type: none"> • Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. • Conflict or be inconsistent with CEQA Guidelines section 15064.3(b). • Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). • Result in inadequate emergency access. 	For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.
0001361.03	<p>Planned Projects</p> <p>1. There is one project located in the City of San Marino. The objective of this project is to increase traffic flow on Huntington Drive, Sierra Madre Boulevard and San Gabriel Boulevard in a residential area. We object to this project based upon its stated objective.</p> <p>LOS ANGELES, LOCAL HIGHWAY, LAF7119, 1A L04, 0, \$1,445,000</p> <p>HUNTINGTON DRIVE MULTIMODAL CAPACITY ENHANCEMENTS: (1) CONSTRUCT A SECOND LEFT-TURN LANE AT THE 2 INTERSECTIONS AT SAN MARINO AV AND AT SAN GABRIEL BL (EASTBOUND ON HUNTINGTON DR AND NORTHBOUND ON SAN MARINO AV AND SAN GABRIEL BL) TO INCREASE CAPACITY AND TRAFFIC FLOW. (2) MODIFIES SIGNAL TIMING TO SHORTEN THE LEFT-TURN MOVEMENT ON HUNTINGTON DR. (3) EXTENDS SIDEWALKS AND ENHANCE PEDESTRIAN FACILITIES.</p>	Comment noted. SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan. Please work with LA Metro to submit your proposed changes to projects for consideration in future amendments or updates to Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	Stephanie Johnson and Ghassan Roumani	Submittal 0001361 Related Documents Link
0001361.04	<p>2. The Technical Report for Highways and Arterials describes Adaptive Traffic Control Systems: TECHNICAL REPORT HIGHWAYS AND ARTERIALS ADAPTIVE TRAFFIC CONTROL SYSTEMS According to the AASHTO Sustainability Peer Exchange Briefing Paper (2009), Caltrans implemented Adaptive Traffic Control Systems (ATCSs) on seven corridors in Los Angeles County as a demonstration project. Traffic signal systems that respond in real-time to changes in traffic patterns are known as “adaptive.” ATCSs continuously detect vehicular traffic volume, compute “optimal” signal timings based on detected volume and simultaneously implement them. Reacting to these volume variations generally results in reduced delays, shorter queues and decreased travel times. ATCSs are designed to overcome the limitations of pre-timed control and respond to changes in traffic flow by adjusting signal timings in accordance with fluctuations in traffic demand. The purpose of Caltrans’ demonstration project is to deploy and evaluate the effectiveness of the future ATCS on the State arterial street network that experiences both recurrent and non-recurrent delay. The ATCS system was shown to reduce travel time by 12.7 percent, reduce average stops by 31 percent, and decrease average delays by 21.4 percent. The following project is planned for South Pasadena. We object to this project based upon its functionality and objective of increasing traffic flow.</p> <p>1. ITS04 SOUTH PASADENA'S ATMS, CENTRAL TCS AND FOIC FOR FAIR OAKS AV. THIS PROJECT IS LOCATED IN SOUTH PASADENA ON FAIR OAKS AV BETWEEN COLUMBIA ST AND HUNTINGTON DR. IT WILL ESTABLISH A FIBER-OPTIC BACKBONE COMMUNICATION SYSTEM CONNECTION BETWEEN 12 SIGNALS ON FAIR OAKS AV AND CITY HALL AND INSTALL THE ATMS/CENTRAL MANAGEMENT/CONTROL SYSTEM AT CITY HALL BUILDING. FUNDS ARE FOR DESIGN AND CONSTRUCTION COSTS.</p>	<p>Comment noted. Most of the projects featured in the Project List Technical Report were provided by the six County Transportation Commissions (CTCs). Requests to delete, replace or modify a project must come through a CTC.</p>
0001361.05	<p>Concerns The City of San Marino has been established as a residential community for over 100 years. It is entirely built, with no room for growth and is located in the San Gabriel valley such that an abundance of cut-through traffic utilizes the residential streets. We are being overwhelmed by ever increasing traffic. There is little in the EIR that addresses this issue. The planned projects for the surrounding areas risk negating the stated Plan goals with regard to the City of San Marino. The increasing traffic is a public nuisance, exacerbates environmental conditions and diminishes public safety. Of particular concern to us are the following:- Increasing northbound-southbound traffic utilizing residential streets as cut-through routes.- Increasing eastbound-westbound traffic utilizing residential streets as cut-through routes.- Increasing eastbound-westbound traffic utilizing Huntington Drive with significant safety risk to students and residents. Residences and six schools are located on the segment of Huntington Drive in San Marino.- The implementation of Adaptive Traffic Control Systems.</p>	<p>Comment noted. Please contact the City of Marino staff and appropriate city officials regarding cut-through traffic concerns. For responses related to the Draft Connect SoCal Program Environmental Impact Report (PEIR), please refer to Chapter 9.0, Responses to Comments, of the Final Connect SoCal PEIR.</p>
0001361.06	<p>The environmental impacts defer to local jurisdiction and cannot conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The SCAG Regional Transportation Plan, is just that: regional, and proposes many projects for increasing mobility and traffic flow, that do not originate in the city of San Marino, but will adversely affect it by increasing its ongoing operating costs, decreasing property values and diminishing the quality of life of the residents. It appears that the city of San Marino, with local jurisdiction, is left to fend for itself.</p>	<p>Comment noted. Please also see the Final Connect SoCal Program Environmental Impact Report, Chapter 9.0 Responses to Comments.</p>

ID	Comment	Response
<i>Submitted by</i> Westerdale, Mark		
0001303.01	Show the long distance Amtrak train routes on maps, with railroad stations (in addition to the Metrolink train routes). And show the entire SCAG region on maps.	Submittal 0001303 Related Documents The Amtrak long-distance routes and rail stations in the SCAG region are shown in the Passenger Rail Technical Report in Exhibit 1, "Amtrak Services".
<i>Submitted by</i> Wybenga, Garreth		
0001540.01	Jan 2020 To whom it may concern Subject Transportation Improvement The Chino Championo of Chino, Calif. 91710 1-112020 It had a list of project that was being done May I add one more to your list it would be a signal light at Walnut Ave and Monte Vista Ave in Chino, CA 91710. The traffic gets heavy after 3pm to 6pm. I have lived at my address . . . for 48 years. Thank you for your attention.	Submittal 0001540 Related Documents Link SCAG worked closely with the six county transportation commissions to identify the projects included in Connect SoCal, and each commission likewise coordinated their countywide projects with local transportation agencies. SCAG worked collaboratively with stakeholders to identify additional key projects that address challenges that are regional in nature. Decisions to delete, replace or modify a project should similarly undergo a coordinated process involving the affected county transportation commission and lead agency. Substantive changes to projects may be addressed in the next update or amendment to the plan.
<i>Submitted by</i> Yessayantz, Alexander		
0001433.01.1.1	I strongly support increased penetration and quality of passenger rail, and local bus service, to provide an effective alternative to driving.	Submittal 0001433 Related Documents Connect SoCal includes significant investments in increased transit and passenger rail service levels through the 2045 horizon year and also emphasizes increased connectivity and other service quality improvements.
0001433.01.1.2	Such improvements should of course be paired with modifications to land use to create walkable and pedestrian friendly environments.	Connect SoCal supports land use strategies to walkable and pedestrian friendly environments. Please refer to the Active Transportation Technical Report for more discussion on this topic area.
0001433.01.1.3	Rail and bus infrastructure on backbone routes should prioritize speed and efficiency, otherwise people are again dissuaded from using them if at non-peak traffic times it takes more than double the time driving to reach their destination.	Connect SoCal includes significant investments in increased transit and passenger rail infrastructure in order to increase service levels and speeds through the 2045 horizon year and also emphasizes increased connectivity and other service quality improvements.
0001433.01.2	A significant barrier and threshold that prevents many from using public transit is the lack of and perceived lack of safety from harassment and health hazards from others, which compounded with the homeless situation, strongly dissuades many from giving up driving.	Security and the perception of security have been identified by transit users as key issues affecting transit use. System security policies and procedures are determined by each transit agency governing board.
0001433.01.3	Looking to electric personal vehicles to solve pollution and respiratory health consequences is unrealistic, as tire dust from friction with the road surface creates particles that pollute the air and sit on surfaces people are exposed to, electric rail poses less of an issue in this regard.	While SCAG recognizes the safety and environmental challenges posed by all automobiles, including electric ones, we believe that electric cars are part of a multi-pronged approach to sustainability. However, we will continue to prioritize transit and active transportation as the most environmentally sustainable modes.
0001433.01.4	Finally, looking to the past can provide some inspiration for changes that attract public transit use and allay people's fears about using it as their principal mode of transport. Employing people as something akin to station masters, and increasing a human staff presence in key points of all the systems would make the user experience much more pleasant, and help transition to a future where the critical mass of ridership itself protects against fears of harassment and danger at most hours of the day.	Security and the perception of security have been identified by transit users as key issues affecting transit use. System security policies and procedures are determined by each transit agency governing board.

ID	Comment	Response
<i>Submitted by</i> Yessayantz, Alexander		
0001433.01.5	Better infrastructure alone will not transform the region transit use, a human touch and a realization of the limitations of technology and the inherent fragility of technology use, as opposed to human staff and personnel should be recognized. Employing a robust program of trained, dedicated, and valued staff who work both from the office side, and onsite is paramount to a system that in the longterm will be resilient to environmental hazards and technological malfunction and disruption. I am otherwise encouraged by the focus on resiliency that is present in the Plan, I simply caution that on a strategic level it cannot be overly stressed that a robust human infrastructure replete with dedicated individuals who retain and pass down knowledge of the region should undergird the goals of the various aspects of the public policy that SCAG and its partners carry out.	Thank you for your comment.
<i>Submitted by</i> Yoon, Andrew		
0001301.01	LA0G830, I-710 Improvement/Shoemaker Bridge - Downtown Exits. The completion year for this project is currently identified as 2020. Due to delays in project development, the project completion year should be revised to 2025.	Comment noted. The requested modification has been incorporated for LA0G830.
<i>Submitted by</i> Zavinski, Tamara		
0001316.01	Greetings, It would be most helpful if Metrolink and/or Amtrak train schedules considered the time that commuters to and from Ventura/Santa Barbara to Oxnard travel. As it is now, a commuter must wait until 8:45 pm to get back to the northern areas if they work past 4:45. If trains ran hourly from 6:00 to 9:00 a.m. and 4:00 to 7:00 pm; workers would use public transportation. There must also be an effort to make Oxnard safer from 5:30-7:00 so commuters are ensured safe passage from downtown Oxnard to the Oxnard transit center. I know many Oxnard employees would prefer to take public transportation to commute if that option was available. Thank you for your consideration.	Connect SoCal supports increases in Metrolink and Amtrak services throughout the SCAG region and Ventura County and encourages the implementation of increased commuter services between Ventura County and Santa Barbara. The LOSSAN Agency, which operates the Pacific Surfliner, and the Southern California Regional Rail Authority (SCRRA), which operates Metrolink, are both planning for increased service levels along this corridor as funding becomes available.
<i>Submitted by</i> Anonymous		
0001302.01	P. 64-67 Completing Our System - TransitThe Slauson Light Rail – Crenshaw/LAX Transit Corridor to Blue Line project listed in TABLE 3.1 (P. 66) Selected Transit Capital Projects is no longer being pursued by Metro and should not be included in this table. The Slauson Light Rail – Crenshaw/LAX Transit Corridor to Blue Line project should also not be included as an Urban Rail (2045) project in EXHIBIT 3.1 2045 Plan Transit Network (P.67). Metro studied a transit rail option in the Slauson corridor and instead decided to pursue an active transportation project called the Active Transportation Rail to River Corridor Project (https://www.metro.net/projects/r2r/). Metro is currently working on the Rail to River Project with funding to build out Segment A by approximately 2021-2022.	The Slauson Light Rail is a regional initiative assumed to be funded by innovative sources identified in the Connect SoCal financial plan, and not through Metro's traditional funding sources. The project is included in the adopted 2016 RTP/SCS and carried forward in the Final Connect SoCal, however, inclusion of the project may be reconsidered in the next RTP/SCS update.
0001302.02	Figure 4.7 Growth in Transit Operating & Maintenance Costs (P. 102)The 14 different shades of green/blue used to display the trends of each transit service provider are just about impossible to identify in the figure.	Proposed revisions will be considered in the Final Connect SoCal.

ID	Comment	Response
<i>Submitted by</i>	Anonymous	Submittal 0001415 Related Documents
0001415.01	<p>I don't want any new train lines through the South Bay. The cost-to-benefit ratio is just way too low. Can't we think of a better way to spend a BILLION dollars of our hard-earned money? I feel like this is just empire-building for Metro. Studies have shown that bus lines are much more effective because they are flexible and actually provide benefit to the people who need it most (i.e. low income people trying to get to work, appointments, school, etc.)</p>	<p>Metro projects such as the Green Line Extension to Torrance must undergo a local alternatives analysis and environmental review process where a number of performance metrics are examined and a locally preferred alternative is selected by the Metro Board. Connect SoCal includes both bus and rail projects to provide residents of Southern California with multiple options for how they travel.</p>



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PUBLIC PARTICIPATION AND CONSULTATION

APPENDIX 2 COMMENTS AND RESPONSES

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