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## MEETING OF THE

# TECHNICAL WORKING GROUP

*Thursday, February 15, 2018*  
*10:00 a.m. – 12:00 p.m.*

#### SCAG OFFICES

900 Wilshire Blvd., Ste. 1700  
Regional Council Room  
Los Angeles, CA 90017  
(213) 236-1800

**HOW TO PARTICIPATE IN MEETING  
ON NEXT PAGE**



# Technical Working Group

February 15, 2018  
10:00 a.m. – 12:00 p.m.

**SCAG Downtown Office – Regional Council Room**  
900 Wilshire Blvd., 17<sup>th</sup> Floor  
Los Angeles 90017

**(How to Participate in Meeting on Next Page)**

## AGENDA

### **Receive and File**

November 16, 2017 TWG Meeting Summary

### **Information Items**

- |    |  |                             |            |
|----|--|-----------------------------|------------|
| 1. | 2019 FTIP & 2016 RTP/SCS Amendment #3 Update | P. Gutierrez/D. Tran        | Attachment |
| 2. | Draft SCAG Public Participation Plan         | M. De Larios                | Attachment |
| 3. | SB 375 Target Update Status                  | P. Chang                    |            |
| 4. | SB 743/CEQA Guidelines Update                | P. Chang/R. Ok<br>M. Gainor | Attachment |



## **How to Participate**

### **In Person**

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#### **SCAG Downtown Office Board Room**

900 Wilshire Blvd., 17<sup>th</sup> Floor

Los Angeles 90017

213-236-1800

### **Web Meeting**

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<https://zoom.us/j/146692880>

### **Teleconference**

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**Telephone:** 646 558 8656

**Webinar ID:** 146 692 880



## **Technical Working Group**

# **Receive and File**



# Technical Working Group

November 16, 2017

## Meeting Summary

The following is a summary of discussions at the Technical Working Group on November 16, 2017.

### Information Items

#### 1. **Update on Regional Safety Target Setting**

Courtney Aguirre, SCAG staff, reviewed with the TWG the schedule and elements of the Regional Safety Targets. Ms. Aguirre notified the TWG of the formula being developed for both the regional and state safety targets as well as the deadlines to submit them to Caltrans.

#### 2. **ARB 2017 Climate Change Scoping Plan Update**

Ping Chang, SCAG staff, provided an update on ARB's 2017 Climate Change Scoping Plan. Mr. Chang reviewed the process to date and noted the ARB is expected to consider the final draft of the scoping plan including all the appendices in December 2017. Mr. Chang reviewed the changes since the January draft.

#### 3. **ARB SB 375 Target Update**

Ping Chang, SCAG staff, updated the working group on recent actions by ARB regarding their target setting efforts.

#### 4. **Future Communities Framework**

Mike Jones, SCAG staff, reported on the Future Communities Framework. Mr. Jones noted that big data and open data provides additional tools for innovative planning and SCAG is currently exploring their integration into its planning activities. Mr. Jones reviewed the future communities framework, the proposed policies and strategies.



## **Technical Working Group**

# **Agenda Item 1**

## 2016 RTP/SCS Amendment #3 Schedule

Last Updated February 2, 2018

(Note: schedule subject to change)

#	ACTIVITY	START DATE	END DATE
<del>1</del>	<del>SCAG opens FTIP database and provides RTP spreadsheet to CTCs to provide project input</del>	<del>10/16/17</del>	<del>1/9/18</del>
<del>2</del>	<del>Deadline for project input</del>	<del>1/9/18</del>	<del>1/9/18</del>
3	Deadline for identification of safety type projects	3/1/18	3/1/18
4	Draft 2016 RTP/SCS Amendment No. 3 and Draft 2019 FTIP presented to SCAG Transportation Committee for release	7/5/18	7/5/18
5	Public comment period begins	7/6/18	7/6/18
6	RTP/SCS Amendment No. 3 and 2019 FTIP Public Hearings (min. 1) - 1st Hearing 7/12/18 2nd 7/24/18	7/12/18	7/24/18
7	Public comment period ends	8/6/18	8/6/18
8	SCAG Regional Council considers approval of the Proposed Final 2019 FTIP and 2016 RTP/SCS Amendment No. 3	9/6/18	9/6/18
9	Submit Amendment #3 to FHWA/FTA for Approval	9/6/18	9/6/18
10	FHWA/FTA Concurrence (Final Approval)	12/16/18	12/16/18



## **Technical Working Group**

# **Agenda Item 2**



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# Overview

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## What is SCAG?

The Southern California Association of Governments (SCAG) is the metropolitan planning organization (MPO) for the six-county Southern California region, including the counties of Imperial, Los Angeles, Orange, San Bernardino, Riverside, and Ventura. From the beaches to the high desert, the six-county region that encompasses Southern California spans 38,000 square miles, 191 cities and a population of over 19 million. The SCAG region is among the largest and most diverse in the world, with a unique combination of languages, ethnicities and cultures.

SCAG is responsible for developing long range transportation, land-use, and environmental plans for the region. An example is the [Regional Transportation Plan/Sustainable Communities Strategy \(RTP/SCS\)](#), which details how the region will address its transportation and land use challenges and opportunities over the next 20+ years in order to achieve its regional emissions standards and greenhouse gas reduction targets.

In addition, SCAG serves as the foremost data clearinghouse and information hub for the region, conducting research and analysis in pursuit of regional planning goals.

## Why does SCAG have a Public Participation Plan?

Planning for such a large and diverse region is impossible without substantial input from the across the region. SCAG relies on public participation as the essential element to the bottom-up and integrated approach to SCAG's planning. The people who live, work and play here have varying, and sometimes conflicting, needs and priorities. Their voices must be heard if we are to develop planning policies that truly meet the needs of the region. To that end, SCAG is committed to conducting robust public outreach and engagement, and has outlined that commitment in this Public Participation Plan.

Updating our Public Participation Plan for 2018 has given SCAG the chance to reflect on our approach, and take into consideration the ways communication and information-sharing have changed since the last update in 2014. The changes in the 2018 update were designed to make the plan more accessible to a general audience, and more adaptable in anticipation of evolving technologies and practices. The organization of the document is a little different: To make it less formal and easier to navigate, we've structured the content as answers to a series of questions. We have also separated out the dense technical and legal language— if you are looking for details about statutory requirements and particulars about processes, you can find them in the appendices. The updated plan includes more context, explaining SCAG's key operations and guiding principles for public participation. We also include (and adapt to) public feedback on our current strategies and methods for public engagement.

This plan details SCAG's goals, strategies, and processes for providing the public and stakeholders with opportunities to be involved in the regional planning process. When we discuss "the public," we are referring to any person who lives, works or plays in the region. When we use the word "stakeholder," we are describing someone affiliated with an entity that has an official role in the regional transportation planning process.

SCAG programs with a public input component will refer to this plan in developing individualized engagement plans.

SCAG's Public Participation Plan will help ensure that SCAG effectively seeks early and ongoing input from people and organizations throughout the region, and effectively addresses the evolving transportation, land-use, and environmental needs of Southern Californians now and for generations to come.

## What does SCAG hope to achieve from public engagement?

SCAG's public participation efforts aim to:

- Ensure that a wide range of perspectives are heard so that planning outcomes reflect the interests and values of the region's diverse communities. To that end, SCAG will engage and consider the needs of traditionally underrepresented and/or underserved populations, such as low-income, minority, the disabled, and Limited English Proficient populations or individuals for whom English is not their primary language and who have a limited ability to read, write, speak or understand English.
- Provide opportunities for the public and stakeholders across the region to engage in meaningful dialogue during the decision-making process.
- Clearly define the purpose of each outreach method at each stage and how feedback will be used to shape the plan and/or program.
- Motivate more feedback from stakeholders, partners, and the public by making commenting on plans and programs easy, convenient, and accessible.
- Reduce geographic barriers by providing public participation opportunities online and via teleconference.
- Show how public and stakeholder viewpoints and preferences were incorporated, communicate the final decisions made, and identify how the received input affected those decisions.
- Encourage stakeholders and members of the public to remain engaged through the decision-making process, the implementation phase and beyond.

## What principles guide SCAG's outreach?

Meaningful public participation is a cornerstone of regional planning and one of SCAG's key priorities. In all outreach work, the agency holds itself to high standards according to SCAG's core values of transparency, leading by example and creating positive impacts in the region. Regardless of how communication technologies and specific tools for engagement continue to evolve, SCAG is committed to following these outreach principles:

- Administer a transparent and clearly communicated process for public participation
- Ensure that opportunities for public involvement are accessible to all communities
- Provide information that is clear, concise, and current, making use of visualization and other techniques to enhance understanding
- Respect and consider all feedback received from members of the public, partners and stakeholders
- Adapt new communications strategies and technologies for public outreach

- Provide engagement opportunities that meet and exceed statutory requirements to ensure broad participation in SCAG's planning activities
- Demonstrate how public input is addressed in SCAG plans, programs and policies

## What laws guide SCAG's public participation process?

SCAG, as a public agency and metropolitan planning organization, is subject to federal and state requirements which emphasize providing continuous and equitable opportunities for public involvement. Below is an overview of the major requirements for SCAG's public outreach; a detailed description of each is available in Appendix A (PAGE #)

### Federal Requirements

- **Federal Metropolitan Planning Law and Regulations**, 23 USC 134 et seq. and 23 CFR Part 450 et seq.
- **Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)**, signed into law in 2005 as Public Law 109-59, authorized funds for Federal-aid highways, highway safety programs, transit program and other purposes and established federal metropolitan transportation planning requirements
- **Americans with Disabilities Act of 1990**, 42 USC 126 and 49 CFR 27.19.
- **Executive Order 12372** — Intergovernmental Review of Federal Programs, Signed July 14, 1982 by President Ronald Reagan.
- **Executive Order 12898** — Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Signed February 11, 1994 by President William J. Clinton.
- **Executive Order 13166** — Improving Access to Services for Persons with Limited English Proficiency. Signed August 11, 2000 by President William J. Clinton.
- **Federal Clean Air Act of 1970**, 42 USC 85 and 40 CFR Parts 50-99.
- **Fixing America's Surface Transportation Act (FAST Act)**, Public Law as passed by Congress and signed by President Obama on December 4, 2015.
- **Moving Ahead for Progress in the 21st Century Act (MAP-21)** signed into law in 2012, requires metropolitan planning organizations to provide opportunities for public involvement
- **Public Works and Economic Development Act** of 1965, 42 USC 38 and 13 CFR 305.
- **Title VI of the Civil Rights Act of 1964**, prohibiting discrimination on the basis of race, color or national origin in carrying out planning and programming activities

### State Requirements

- **California Public Records Act**, adopted in 1968, requires disclosure of records to the public upon request
- **Ralph M. Brown Act**, passed in 1953, which guarantees the public's right to attend and participate in meetings
- **Senate Bill 375**, enacted in 2008, requires SCAG to develop a Sustainable Communities Strategy as part of the Regional Transportation Plan

## Who participates in SCAG's planning process?

SCAG represents the whole six-county region in all its geographic and demographic diversity. SCAG is committed to engaging, and utilizing input from, a range of constituents and stakeholders.

This commitment includes tailoring communications and information-sharing to a range of different levels of experience with, and understanding of the principles of metropolitan planning.

(Note: When we discuss “the public,” we are referring to any person who lives, works or plays in the region. When we use the word “stakeholder,” we are describing someone affiliated with an entity that has an official role in the regional transportation planning process.)

## Public

**General Public** – SCAG plans for all residents of the region, with particular consideration to the accessibility needs of underserved groups such as minority and low-income populations, elderly and retired persons, children, limited English proficiency populations, and people with disabilities.

## Stakeholders

**Community Organizations** – SCAG seeks to engage community groups such as environmental advocates, special interest nonprofit agencies, neighborhood groups, homeowner associations, and charitable organizations.

**Public Agencies** – SCAG solicits input from, and often collaborates closely with, public organizations like local transportation providers, air quality management districts, public health agencies, water districts, county transportation commissions, the region’s ports, educational institutions, and agencies at the state and federal level.

**Business Community** – SCAG actively engages many private-sector entities whose work intersects with transportation and land use planning, including private transportation providers, freight shippers, consulting firms, technology developers, and business associations.

**Elected Officials** – SCAG seeks engagement with elected representatives at all levels, from neighborhood councils, to mayoral offices and city councils, to county supervisor boards, to state and federal legislators.

**Tribal Governments** – SCAG solicits consultation from the region’s tribal governments, sustaining effective government-to-government collaboration on transportation planning and ensuring that tribal sovereignty is observed and protected.

*(A full list of our stakeholders and interested parties is included in Appendix A.)*

# Methods

## How do we engage the public?

SCAG is committed to providing access to accurate, understandable, pertinent, and timely policy, program, and technical information to facilitate effective public participation in the agency’s decision-making process. There are numerous opportunities for continuing involvement in the work of SCAG through the following methods. SCAG aims to increase early and meaningful participation through targeted outreach strategies.

## General Public Participation Approach

Programs that have a public outreach component will use these methods as a guide in developing individual, project-specific public participation plans tailored according to scope and audience.

### Public Meetings and Events

- Customized presentations offered to existing groups and organizations
- Workshops co-hosted with community groups, business associations and other partners
- Contracts with community-based organizations in low-income and minority communities for targeted outreach
- Sponsorship of topical forums or summits with partner agencies or universities, with the media or other community organizations (e.g. Demographic Workshop, Economic Summit)
- Opportunities for public input directly to policy board members
- Outreach at locations, destinations, or events where people are already congregating (e.g. transit hubs, farmers markets, community festivals, universities)

### Public Meetings and Events - Methods

- Open houses
- Themed workshops (to help avoid information overload)
- Question-and-answer sessions with planners and/or policy committee members
- Break-out sessions for smaller group discussions on multiple topics
- Interactive exercises
- Customized presentations with designated opportunities for feedback
- Vary time of day (day/evening) and days of week (weekday, weekend) for workshops
- Conduct meeting entirely in alternative language
- Provide videoconferencing or virtual meeting options
- Demonstration events to showcase project components

### Visualization Methods

- Maps
- Charts, illustrations, photographs, photograph simulations
- Artist renderings and drawings
- Table-top interactive displays and models
- Website content and interactive games
- PowerPoint slide shows

### Public Survey Methods

- Electronic surveys via web (accessed remotely or at public workshops via tablets or laptops)
- Intercept interviews where people congregate, such as at transit hubs (e.g., Orange County's ARTIC, Los Angeles Union Station, etc.) or farmers markets
- Printed surveys distributed at meetings, transit hubs, on-board transit vehicles, etc.

### Commenting Methods

- Polls/surveys (electronic or paper)
- Paper comment cards
- Online comment cards
- Post it notes or stickers
- Marking up maps or language
- Phone calls or voicemails directly to staff or to a dedicated hotline
- Email sent to SCAG staff or [via our online contact form](#)
- Physically mailed letters

## Methods for Communicating the Impact of Public Comments

- Summarize key themes of public comments in staff reports to SCAG's standing policy committees, working groups and to SCAG's main governing board, the Regional Council
- Newsletters and other emails to participants to report final outcomes
- Updated and interactive web content

## Public Participation Opportunities

SCAG regularly holds meetings and events, open to the public, where people are welcome to make comments. A comprehensive calendar of upcoming opportunities for public involvement is available on SCAG's website, [scag.ca.gov](http://scag.ca.gov).

To provide opportunities for people to participate or comment from locations throughout the region, SCAG's main office in Los Angeles and each regional office are equipped with state-of-the-art videoconferencing systems. SCAG provides additional videoconferencing sites in Coachella Valley, Palmdale and South Bay to provide additional opportunities for participation in SCAG meetings and workshops. SCAG also utilizes web and audio conferencing and often connects to videoconferencing locations throughout the state.

## Regular Meetings

### ***SCAG's Regional Council***

All of SCAG's plans and programs are adopted by its Regional Council, an 87-member governing board of elected officials, including city representatives from throughout the region, at least one representative from each county Board of Supervisors, and a representative of the Southern California Native American Tribal Governments. The region is divided into districts of roughly equal population in order to provide diverse, broad-based representation. The Regional Council meets once a month and meetings are open to the public. Regional Council meetings are typically held on the first Thursday of the month at 12:15 p.m. Specific meeting dates and times can be found on SCAG's website, as well as agenda materials which are posted **x** days in advance. Members of the public are welcome to attend and provide input, either by submitting a comment on an individual agenda item or making general comments by submitting a comment card at the start of the meeting.

### ***SCAG's Policy Committees***

SCAG's policy-making process is guided by the work of three Policy Committees: Transportation Committee (TC); Community, Economic and Human Development (CEHD) Committee; and Energy and Environment Committee (EEC). Members of the Regional Council are appointed to one of the policy committees for two-year terms. Most of the discussion and debate on the "nuts and bolts" of a policy issue occurs in the committees. Issues to be considered by the Regional Council must come through one or more of the committees. As opposed to Regional Councilmembers, members of policy committees do not have to be elected officials. The policy committee meetings typically occur in the morning on the same day of the Regional Council meetings. Members of the public are welcome to attend and provide input, either by submitting a comment on an individual agenda item or making general comments by submitting a comment card at the start of the meeting.

### ***Various other Committees, Subcommittees, Task Forces and Working Groups***

These are focus groups convened to work on specific topic areas and vet highly technical matters. For example, the Technical Working Group (TWG) is an advisory peer group formed to provide SCAG staff with a venue to vet technical matters as they relate to SCAG's development of its regional plans,



including the RTP/SCS. For the 2016 RTP/SCS, multiple working groups were convened including: Active Transportation Working Group, Public Health Working Group, and Natural/Farm Lands Working Group.

### ***Special Public Meetings, Conferences, and Forums***

Public meetings on specific issues are held as needed. If statutorily required, formal public hearings are conducted, and publicly noticed. SCAG typically provides notice through posting information on SCAG's website, and, if appropriate, through e-mail notices and news releases to local media outlets. Materials to be considered at SCAG public hearings are posted on SCAG's website, and are made available to interested persons upon request.

### ***Workshops, Community Forums, and Other Events***

SCAG conducts workshops, community forums, and other events to keep the public informed and involved in various high-profile transportation projects and plans, and to elicit feedback from the public, partners, and stakeholders. SCAG holds meetings throughout the six-county region to solicit comments on major plans and programs, such as the RTP/SCS. Meetings are located and scheduled to maximize public participation (including evening meetings). For major initiatives and events, SCAG typically provides notice through posting information on SCAG's website, and, if appropriate, through e-mail notices and news releases to local media outlets. At least once every year, SCAG convenes its General Assembly to bring together the official representatives of SCAG's membership and help set the agency's course for the coming year.

### ***Targeted Mailings***

SCAG maintains a database of local government officials and staff, and other public agency staff and interested persons. The database allows SCAG to send targeted mailings (largely via email) to ensure the public, partners, and stakeholders are kept up to date on specific issues of interest.

## **How do we reach out to the public?**

### **Public Outreach Channels**

#### ***Digital channels***

##### ***Website***

SCAG's maintains its website, [www.scag.ca.gov](http://www.scag.ca.gov), to ensure that the public, partners, and stakeholders are kept informed about SCAG's plans and programs and upcoming meetings. SCAG aims to ensure that its website is user-friendly and provides clear information. The website offers the public the opportunity to sign up for further information and updates via email. It also provides SCAG staff contact information.

##### ***Email***

SCAG SPOTLIGHT, the official newsletter of the Regional Council, and SCAG UPDATE, the agency's regular newsletter offering details on current agency programs and events. (Newsletters are archived online at [www.scag.ca.gov](http://www.scag.ca.gov).)

##### ***Social media***

SCAG maintains an active social media presence on Twitter (@SCAGnews) and Facebook (@scagmpo). These accounts are regularly updated to share agency announcements, upcoming event details and new developments in SCAG's plans and programs.



### *Targeted Mailings/Flyers*

- Work with community-based organizations to distribute flyers
- Email to targeted database lists
- Place notices on-board transit vehicles and at transit hubs

### *Local Media*

- Press releases
- Invite reporters to news briefings
- Meet with editorial staff
- Opinion pieces/commentaries
- Explore advertising opportunities in local newspapers
- Visit minority media outlets to encourage use of SCAG press releases
- Place speakers on radio/TV talk shows
- Public Service Announcements on radio and TV
- Written notices published in local newspapers

### *Internet/Electronic Access to Information*

- Dynamic websites with updated content
- Videos explaining plans, programs, or concepts
- Maintain regular presence on social media outlets
- Podcast interviews
- Live broadcasts and archived recordings of public events
- Electronic duplication of open house/workshop materials
- Interactive website with surveys, commenting areas
- Access to planning data (such as maps, charts, background on travel models, forecasts, census data, research reports)
- Provide information in advance of public meetings

### *Targeted Notifications*

- Blast e-mails
- Notices widely disseminated through partnerships with local government and community-based organizations
- Electronic newsletters
- Social media such as Twitter and Facebook
- Local media
- Notices placed on-board transit vehicles and at transit hubs
- Submit articles for publication in community/professional/corporate newsletters

### *Methods for Involving Traditionally Underserved/Underrepresented Communities*

- Grants to community-based organizations to co-host meetings and remove barriers to participation by offering such assistance as child care or translation services
- Flyers on transit vehicles and at transit hubs
- Outreach in the community (e.g., at churches, health centers, schools etc.)
- Use of community and minority media outlets to announce participation opportunities

### *Methods for Involving Limited-English Proficient Populations*

- Translate select documents into the four largest Limited English Proficiency (LEP) languages – Spanish, Chinese, Korean and Vietnamese, making these documents available for download on the agency’s website.
- Have translators, including bilingual staff members, available for public meetings and workshops as needed, with 72-hour advance notice
- Survey LEP participants at public hearings to assess the effectiveness of the agency’s language services and whether alternate services may need to be employed
- Disseminating notices of availability and press releases to print, radio and broadcast media serving minority communities

## Which programs have established public participation procedures?

### Regional Transportation Plan/Sustainable Communities Strategy

The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) represents the vision for Southern California’s future, including policies, strategies, and projects for advancing the region’s mobility, economy, and sustainability. The RTP/SCS details how the region will address its transportation and land use challenges and opportunities in order to achieve its air quality emissions standards and greenhouse gas reduction targets. An update of an existing RTP/SCS is required every four years, and SCAG is currently undertaking the development of the 2020 RTP/SCS to provide Southern California with a comprehensive vision for its transportation future to the year 2045.

Developing the long-range plan for the SCAG region takes between two and three years to complete and involves working with six county transportation commissions, 191 cities, and numerous other stakeholder organizations and the public. The 2020 RTP/SCS involves goal setting, target setting, growth forecasting, financial projections, scenario development and analysis, and significant issues exploration.

Throughout the 2020 RTP/SCS development, SCAG’s Regional Council; Community, Economic, and Human Development Committee; Energy and Environment Committee; and Transportation Committee will consider the challenges and opportunities facing our region and how to best address them, while considering public input.

The process will need to be flexible and subject to change, as needed, to reflect and respond to the input received as SCAG moves through the steps of updating the plan. SCAG will update its details regularly to help direct interested SCAG residents and organizations to participate in key actions or decisions being taken. Details will be on the plan website at [www.scagrtpsc.org](http://www.scagrtpsc.org).

*(For additional information on the RTP/SCS public participation procedures, see Appendix B.)*

### Program Environmental Impact Report for the RTP/SCS

Pursuant to the California Environmental Quality Act (CEQA), SCAG will prepare a Program Environmental Impact Report (PEIR) to evaluate the potential environmental impacts associated with the implementation of the 2020 RTP/SCS. The PEIR will focus on a region-wide assessment of existing conditions and potential impacts as result of the 2020 RTP/SCS, as well as broad policy alternatives and program-wide mitigation measures.

The PEIR will serve as an informational document to inform decision-makers and the public of the potential environmental consequences of approving the proposed plan by analyzing the projects

and programs on a broad regional scale, not at a site-specific level of analysis. Site specific analysis will occur as each project is defined and goes through individual project-level environmental review.

SCAG will hold various scoping meetings and workshops throughout the PEIR development process to solicit input from SCAG stakeholders and the public. SCAG will ensure the PEIR is accessible to the public for review and comment.

*(For additional information on the PEIR public participation procedures, see Appendix B.)*

### Environmental Justice Program

Pursuant to regulatory compliance, SCAG has developed a policy to ensure that environmental justice principles are an integral part of the transportation and land use planning process, including the RTP/SCS. SCAG's environmental justice program has two main elements: technical analysis and public outreach. The two major elements of the program contribute to the development of the EJ Appendix of the 2020 RTP/SCS, which conducts a technical analysis of EJ issues of the region and discusses outreach strategies, and SCAG's role as a resource for local jurisdictions that are required to incorporate EJ policies, goals, and objectives into their General Plans per SB 1000 requirements.

The overall environmental justice outreach process encourages SCAG stakeholders and the public, with many opportunities to be involved, to discuss and address environmental justice issues and shape SCAG's environmental justice program.

*(For additional information on the Environmental Justice public participation procedures, see Appendix B.)*

### Regional Housing Needs Assessment

SCAG is required to make updates to the eight-year Regional Housing Needs Assessment (RHNA). The RHNA quantifies the need for housing within each jurisdiction. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth.

Both the RTP/SCS and RHNA use the local input survey as the basis for future demographic projections, including household growth. The next RHNA cycle, also known as the 6th cycle, will cover the planning period October 2021 through October 2029. The latest SCAG can adopt the 6th RHNA allocation is October 2020, but SCAG is looking at alternative schedules for a possible earlier adoption date, possibly to coordinate with the adoption of the 2020 RTP/SCS.

As part of its public outreach for the RHNA process, SCAG will hold public meetings, workshops and public hearings at different points in the RHNA process to receive verbal and written input. SCAG staff will also coordinate with subregional COGs and other groups to update local jurisdictions and other stakeholders on the RHNA process and allocation.

### Federal Transportation Improvement Program

SCAG's Federal Transportation Improvement Program (FTIP) is the short term capital listing of all transportation projects proposed over a six-year period. The listing identifies specific funding sources and funding amounts for each project. The proposed transportation projects are funded through a variety of federal, state and local sources. Projects consist of improvements such as, highway improvements, transit, high occupancy vehicle lanes, signal synchronization, intersection improvements, bikeways, and freeway ramps to name a few. The FTIP must include all transportation projects that are federally funded, and/or regionally significant regardless of funding source or whether subject to any federal action.

Projects in the FTIP are submitted to SCAG by the six County Transportation Commissions. SCAG analyzes the projects to ensure that they are consistent with state and federal requirements. Federal law requires the FTIP be consistent with the RTP.

SCAG works with transit operators and county transportation commissions on developing the FTIP. The public participation process and coordination is a tiered process within the SCAG region, beginning at the county level with each transportation commission developing their own transportation improvement program (TIP). There are several opportunities for the public to review and comment on projects and programs during the development of each county TIP and approval of the SCAG FTIP.

*(For additional information on the FTIP public participation procedures, see Appendix B.)*

### Overall Work Program

Funding for SCAG's metropolitan planning activities are documented in an annual Overall Work Program, or OWP, pursuant to federal requirements. The OWP is developed each fiscal year, and details the agency's planning and budgetary priorities for the following fiscal year. SCAG's federal and state funding partners (FHWA, FTA and Caltrans) must approve SCAG's OWP each year before it takes effect.

*(For additional information on the OWP public participation procedures, see Appendix B.)*

## Evaluation

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### Why does SCAG evaluate public participation activities?

SCAG regularly monitors its communication and outreach activities in order to ensure that public and stakeholder concerns and input are directly addressed in its policies and programs, as well as to find areas for improvement. Additionally, these measurements are used to ensure public outreach outcomes are in compliance with state and federal requirements.

In developing this updated Public Participation Plan, we sought feedback from stakeholders and the public on our current outreach and engagement practices. In a survey distributed digitally, we asked respondents to let us know which of our public participation activities are most effective, and how we can improve our efforts.

Major survey takeaways include:

- Respondents ranked email as their most frequently used SCAG communication channel by a clear margin. Local media announcements were reported as the most infrequently used.
- When asked about the most effective ways for SCAG to keep them engaged, those surveyed overwhelmingly supported email communications: 62% expressed a preference for "Regular, monthly e-mail newsletters with brief snippets of information," and 23% chose "Infrequent direct email on a singular issue," over alternative choices like social media and online video content.

- 81% of respondents reported feeling that they have adequate access and opportunity to comment on SCAG’s plans and publications.
- 94% of those surveyed reported being either “somewhat satisfied” or “very satisfied” by SCAG’s responsiveness to inquiries and comments.
- More than 75% of respondents indicated support for SCAG collecting demographic data (such as age, race, or primary language) in public engagement efforts, to support more inclusive outreach.
- Additional comments requested more frequent and up-to-date information sharing on digital channels, and multiple respondents expressed a desire for more frequent, or better publicized, opportunities to provide input (beyond annual meetings and on the Regional Transportation Plan).

This plan moves to address this feedback by placing a greater emphasis on online engagement efforts, particularly via email, and more clearly outlining SCAG’s regular public comment opportunities. The survey input will also inform some of our future evaluation methods, incorporating demographic data as a metric because of the expressed stakeholder support.

SCAG will continue to periodically survey the public and stakeholders to assess the effectiveness of the procedures and strategies contained in the Public Participation Plan, to ensure a full and open participation process.

## What does SCAG measure?

SCAG measures the outcomes of a diverse array of public participation activities, with context-sensitive evaluation methods that tailor goals to each project.

Benchmarks used to gauge success in public outreach include but are not limited to:

- Number of meetings or events held
- Number of meeting/event attendees
- Amount spent on outreach elements
- Media coverage
- Type and quantity of materials presented
- Email distribution numbers, including open and click-through rates
- Digital metrics including web traffic and social media engagement
- Impressions (estimates of digital and print exposure)

The following chart shows the measurements activities that correspond with previously stated public participation goals.

Goal	Example Metrics
Ensure that a wide range of perspectives are heard so that planning outcomes reflect the interests and values of the region’s diverse communities. To that end, SCAG will engage and consider the needs of traditionally underrepresented and/or underserved populations, such as low-income, minority, the disabled, and Limited English Proficiency populations.	Number of meetings held in traditionally under represented communities; availability of translation services and materials; availability of accommodations for seeing and hearing impaired; location accessibility.

Provide opportunities for the public and stakeholders across the region to engage in meaningful dialogue during the decision-making process, and clearly define the purpose of each type of outreach at each stage and how feedback will be used to shape the plan and/or program.	Number of meetings held in each county; how outreach methods are tailored to meet the needs of specific projects and/or communities; type and quality of materials presented; recurring surveys and opportunities for public evaluation of SCAG's outreach efforts.
Motivate more feedback from stakeholders, partners, and the public by making commenting on plan and programs convenient and accessible.	Number and scope of media advertisements for public comment opportunities; response rate to email blasts and other digital communication methods; SCAG website hits; and number of comments collected at meetings, online and through mail.
Evaluate and incorporate public and stakeholder viewpoints and preferences into final decisions where appropriate and possible, communicate the decisions made and how the received input affected those decisions.	Documentation of how public and stakeholder comments were addressed in final decisions, policies and plans; communication with commenting stakeholders informing them of how their input was addressed.
Encourage stakeholders and members of the public to remain engaged through the decision-making process, the implementation phase and beyond.	Recurring surveys and opportunities for public comment on public participation plans, and publish yearly public outreach report measuring success and ways of improvement for the next year.

## How does SCAG define success?

SCAG uses qualitative and quantitative methods to evaluate the success of its public participation strategies. Depending on the scope and location of the project or activity, SCAG measures feedback through:

- Setting clear, measurable outcomes.
- Establishing benchmarks to gauge success (i.e. 75% of respondents rated a workshop at 4 or higher on a six-point scale).
- Reviewing past processes, activities, and evaluations to see what actions the Agency took as a result, noting lessons learned.
- Identifying and simplifying public involvement techniques that produce more cost-effective decisions.
- Evaluating public participation plans with surveys and opportunity for public comment.
- Highlight yearly public outreach successes and areas for improvement in annual accomplishments report.
- Measuring impact of digital outreach strategies by documenting number of hits on website, social media (Twitter and Facebook), and number of followers, shares retweets, tweets, direct tweets, mentions etc.
- Measuring growth of distribution lists size, and number of requests to join distribution lists.
- Counting number of attendees, comments received and press mentions for project specific open houses, meetings & workshops.
- Counting number of registrations vs actual attendance at events.
- Counting registrations and log-ins for webinars.

- Documenting the distribution, press mentions, number of calls, and comments for physical outreach materials such as direct mailings and flyers.
- Documenting press mentions, number of calls, and comments related to press releases.
- Tracking how often SCAG is mentioned in media such as news articles, blog posts, TV news etc. Other aspects to document are: circulation/popularity of news outlet; whether reference is positive or negative; content and number of comments on article/blogpost; number of times article/blog post has been shared; and what projects/programs are being mentioned.
- Scientific polling to obtain metrics regarding the effectiveness of its outreach
- Reporting to agency leadership on level of success with respect to public participation using these methods

## What should you do now?

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### Find Information

*WEB AND VIDEO* – SCAG’s website, [www.scag.ca.gov](http://www.scag.ca.gov), serves as the comprehensive resource for SCAG’s programs and policy initiatives, agendas for Regional Council and Policy Committee meetings, fact sheets and calendar of SCAG events. Live and archived video of Regional Council meetings and other SCAG-related video productions are available in the SCAG-TV section.

*DATA LIBRARY* – SCAG has a wide range of data and web tools to help you access regional planning data, statistics and research information. We also have an extensive GIS library, which provides free access to a diverse collection of geographic and spatial data. SCAG’s data have been used by interested parties for a variety of purposes including: data and communication resources for elected officials; businesses and residents; community planning and outreach; economic development; visioning initiatives; and grant application support.

*GROUP PRESENTATIONS* – SCAG’s planning staff are available to conduct presentations to community and stakeholder groups. Presentations can be tailored to address a specific topic, area of concern, or provide a general overview of how SCAG works on many different issues. Request a SCAG presentation to your organization or community by contacting [[address](#)].

### Stay Connected

*E-NEWSLETTERS* – SCAG SPOTLIGHT is the official newsletter of the Regional Council. It includes information on recent Regional Council actions, an update from SCAG’s Executive Director and news on upcoming events. SCAG UPDATE is the agency’s regular newsletter, which offers updates on agency programs and events. To view or subscribe to SCAG’s e-newsletters, visit [www.scag.ca.gov](http://www.scag.ca.gov).

*SOCIAL MEDIA* – SCAG is active on several social networking sites to help expand awareness of SCAG and broaden interest in its regional planning work. Engage with SCAG and stay current with news and events by following the agency on Facebook at @scagmpo or on Twitter at @SCAGnews.

*MULTILINGUAL ACCESS* – SCAG seeks to ensure that diverse populations are involved in the regional planning process. With a minimum advance notice of 72 hours, SCAG makes available

translation assistance at its workshop and public meetings. SCAG translates key outreach materials into several languages and makes them available on the SCAG website, [www.scag.ca.gov](http://www.scag.ca.gov).

## Share Input

SCAG welcomes the public to address the Regional Council and Policy Committees at every monthly meeting. Meetings for special subcommittees also include time for public comments. Visit the Public Participation Form on the SCAG website at [www.scag.ca.gov](http://www.scag.ca.gov) to weigh in on important issues in Southern California. Locations for SCAG's main office and regional offices are listed below:

- Main Office: 900 Wilshire Blvd., Suite 1700, Los Angeles, CA 90017
- Imperial County Office: 1503 N. Imperial Avenue, Suite 104, El Centro, CA 92243
- Orange County Office: 600 S. Main Street, Suite 906, Orange, CA 92863
- Riverside County Office: 3403 10th Street, Suite 805, Riverside, CA 92501
- San Bernardino County Office: 1170 W. 3rd Street, Suite 140, San Bernardino, CA 92410
- Ventura County Office: 950 County Square Drive, Suite 101, Ventura, CA 93003

If you have general comments or questions please feel free to email us at: [contactus@scag.ca.gov](mailto:contactus@scag.ca.gov).

### ***Regional Affairs Staff and Offices***

To address the challenges of coordinating participation activities and events across 38,000 square miles of the region, SCAG established regional offices in the counties of Imperial, Orange, Riverside, San Bernardino and Ventura. Each office is staffed by a Regional Affairs Officer who coordinates SCAG activities for each county.



# APPENDIX A.

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## Legal Public Participation Requirements

### Federal Planning Requirements

As the MPO designated for the six-county metropolitan planning area (MPA), SCAG is responsible under federal and state transportation planning law, to develop a metropolitan transportation plan, referred to by SCAG as the Regional Transportation Plan (RTP) and a transportation improvement program (TIP), referred to as the Federal Transportation Improvement Program (FTIP).

The 2005 “Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users” (SAFETEA-LU) set forth public participation requirements for MPOs in developing these transportation plans. Specifically, SAFETEA-LU required MPOs to develop, in collaboration with interested parties, a Public Participation Plan that would provide reasonable opportunities for all parties to participate and comment on regional transportation plans. The transportation reauthorization bill “Moving Ahead for Progress in the 21st Century” (MAP-21) continues an emphasis on providing early and continuous opportunities for public involvement.

In carrying out its planning work, SCAG must comply with federal metropolitan planning law and regulations (23 U.S.C. Section 134 et seq. and 23 CFR Part 450 et seq.), state transportation planning law (Cal Gov. Code Section 65080 et seq.) which incorporates the requirements of California Senate Bill 375 (Steinberg 2008). SCAG is further committed to developing and updating its regional transportation plans in accordance with the following requirements, including but not limited to: California Environmental Quality Act (CEQA) and Guidelines; Federal Clean Air; American with Disabilities Act of 1990 (ADA); Title VI of the Civil Rights Act; Executive Order 12898 regarding Environmental Justice; Executive Order 13166 regarding Improving Access to Services for Persons with Limited English Proficiency; Executive Order 13175 regarding Consultation and Coordination with Indian Tribes.

SCAG’s Public Participation Plan procedures will follow and must comply with the following federal planning regulations set forth under 23 C.F.R. Section 450.316:

1. The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, business and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.
2. The participation plan shall be developed by the MPO in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for:
  - (i) Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;

- (ii) Providing timely notice and reasonable access to information about transportation issues and processes;
  - (iii) Employing visualization techniques to describe metropolitan transportation plans and TIPs;
  - (iv) Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
  - (v) Holding any public meetings at convenient and accessible locations and times;
  - (vi) Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;
  - (vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;
  - (viii) Providing an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by SCAG and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts;
  - (ix) Coordinating with the statewide transportation planning public involvement and consultation processes under subpart B of this part [regarding Consultation]; and
  - (x) Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.
3. When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency consultation process required under the EPA transportation conformity regulations (40 CFR part 93), a summary, analysis, and report on the disposition of comments shall be made as part of the final metropolitan transportation plan and TIP.
4. A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by SCAG. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.

### **Consultation Requirements & Activities**

SCAG must consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the RTP. The consultation shall involve, as appropriate:

1. Comparison of transportation plans with State conservation plans or maps, if available; or
2. Comparison of transportation plans to inventories of natural or historic resources, if available.

*See 23 U.S.C Section 134(i)(5).*

SCAG's consultation requirements under federal planning regulations are set forth under 23 C.F.R. Section 450.316(b)-(e) as follows:

- (b) In developing metropolitan transportation plans and TIPs, the MPO should consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation (including State and local planned growth, economic development, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities. In addition, metropolitan transportation plans and TIPs shall be developed with due consideration of other related planning activities within the metropolitan area, and the process shall provide for the design and delivery of transportation services within the areas that are provided by:
1. Recipients of assistance under title 49 U.S.C. Chapter 53;
  2. Governmental agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and
  3. Recipients of assistance under 23 U.S.C. 204.
- (c) When the MPA includes Indian Tribal lands, the MPO shall appropriately involve Indian Tribal government(s) in the development of the metropolitan transportation plan and the TIP.
- (d) When the MPA includes Federal public lands, the MPO shall appropriately involve the Federal land management agencies in the development of the metropolitan transportation plan and TIP.
- (e) MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under Section 450.314 [metropolitan planning agreements].

Consultation activities are accomplished primarily through our policy committees, other committees, subcommittees, task forces, and working groups. Policy committees are primarily made up of local elected officials. There are several issue-specific as well as mode-specific committees, subcommittees, task forces and working groups that are on-going as well as some that are created for a specific purpose and specific timeframe. All of these groups provide input to SCAG who thereafter forwards their recommendations to the policy committees. Examples include the Aviation Technical Advisory Committee, Technical Working Group, Transit Technical Advisory Committee, Modeling Task Force, and Transportation Conformity Working Group. (TCWG). Subsequent to the adoption of the 2012-2035 RTP/SCS SCAG convened six subcommittees: Active Transportation, Goods Movement, High-Speed Rail and Transit, Public Health, Sustainability, and Transportation Finance. These subcommittees were formed to follow up on implementing the 2012-2035 RTP/SCS and to help guide development of the 2016-2040 RTP/SCS. These subcommittees completed their work and reported to the SCAG Policy Committees in 2013. Membership on these groups includes elected officials as well as stakeholder agency representatives. The stakeholders have a direct pipeline to SCAG's planning processes through these groups.

SCAG conducts meetings with all 191 member city managers and provides individual city council briefings when requested. Also, SCAG conducts several workshops prior to releasing the Draft RTP/SCS involving stakeholders to ensure that their input on major issues is addressed in the plan. In addition, SCAG meets with State and local agencies responsible for land use management, natural resources, environmental protection, etc.

SCAG also utilizes the subregional council of governments (COG) structure to get the word out and solicit input on the content as well as the planning and programming process from local stakeholders.

SCAG mails out a notice of the Draft RTP and FTIP availability to the stakeholders at the local, state and federal level to solicit their comment and input to the final RTP and FTIP. Comments as well as responses are fully documented and reflected in the final RTP.

SCAG engages Tribal Governments in the RTP and FTIP processes through Tribal Government representation on SCAG's governing board and policy committees.

### **Title VI and Environmental Justice**

Consideration of Environmental Justice in the transportation planning process stems from Title VI of the Civil Rights Act of 1964 ( Title VI). Title VI establishes the need for transportation agencies to disclose to the public the benefits and burdens of proposed projects on minority populations. Title VI states that "No person in the United States shall, on the ground of race, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Additionally, Title VI not only bars intentional discrimination, but also unjustified disparate impact discrimination. Disparate impacts result from policies and practices that are neutral on their face (i.e., there is no evidence of intentional discrimination), but have the effect of discrimination on protected groups. The understanding of civil rights has expanded to include low-income communities, as further described below.

In the 1990's, the federal executive branch issued orders on Environmental Justice that amplified Title VI, in part by providing protections on the basis of income as well as race. These directives, which included President Clinton's Executive Order 12898 (1994) and subsequent U.S. Department of Transportation (DOT) and Federal Highway Administration (FHWA) orders (1997 and 1998, respectively), along with a 1999 DOT guidance memorandum, ordered every federal agency to make Environmental Justice part of its mission by identifying and addressing the effects of all programs, policies and activities on underrepresented groups and low-income populations. Reinforcing Title VI, these measures ensure that every federally funded project nationwide consider the human environment when undertaking the planning and decision-making process.

On August 4, 2011, seventeen federal agencies signed the "Memorandum of Understanding on Environmental Justice and Executive Order 12898." The signatories, including the U.S. Department of Transportation (DOT), agreed to develop Environmental Justice strategies to protect the health of people living in communities overburdened by pollution and to provide the public with annual progress reports on their efforts. The MOU advances agency responsibilities outlined in the 1994 Executive Order 12898 and directs each of the Federal agencies to make Environmental Justice part of its mission and to work with other agencies on Environmental Justice issues as members of the Interagency Working Group on Environmental Justice.

In response to this MOU, DOT revised its Environmental Justice Strategy. The revisions reinforce the DOT's programs and policies related to Environmental Justice and strengthen its efforts to outreach to minority and low-income populations. In addition, in July 2012 the Federal Transit Authority (FTA) issued two Circulars on Title VI and Environmental Justice to clarify the requirements and offer guidance. FTA Circular 4702.1A, Title VI Requirements and Guidelines for Federal Transit Administration Recipients provides information required in the Title VI Program, changes the reporting requirement from every four years to every three years, and adds a requirement for mapping and charts to analyze the impacts of the distribution of State and Federal public transportation funds. The FTA Circular 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients (Docket number FTA-2011-0055) provides recommendations to MPOs (and other recipients of FTA funds) on how to fully engage Environmental Justice populations in the public transportation decision-making process; how to determine whether Environmental Justice populations would be subjected to disproportionately high and adverse human health or environmental effects as a result of a transportation plan, project, or activity; and how to avoid, minimize, or mitigate these effects. The Circular does not contain any new requirements, policies or directives. Nonetheless, SCAG complies with the framework provided to integrate the principles of Environmental Justice into its decision-making processes.

Under federal policy, all federally funded agencies must make Environmental Justice part of their mission and adhere to three fundamental Title VI/Environmental Justice principles:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

In addition to Federal requirements, SCAG must comply with California Government Code Section 11135, which states that, "no person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency that is funded directly by the state, or receives any financial assistance from the state."

The State of California also provides guidance for those involved in transportation decision-making to address Environmental Justice. In 2003, the California Department of Transportation (Caltrans) published the Desk Guide on Environmental Justice in Transportation Planning and Investments to provide information and examples of ways to promote Environmental Justice. The Desk Guide identified requirements for public agencies, guidance on impact analyses, recommendations for public involvement, and mitigation.

Finally, SCAG has in place a Title VI Program which was approved by FTA on February 22, 2012. The Title VI Program includes a process for investigating Title VI complaints as well as a copy of the agency's Limited English Proficiency (LEP) Outreach Plan. The key elements of the LEP Plan include: (1) Spanish speaking translators available upon request for meeting and workshops; (2) selected RTP materials available in English, Spanish, Chinese and Korean languages; and (3) utilization of a specialty outreach consultant to engage with the LEP and minority communities. SCAG will continue these efforts for the 2016 RTP/SCS cycle. SCAG will also be updating the Title VI Program and LEP

Plan by October 2014 as requested by the State Department of Transportation. More information about the agency's Title VI Program and LEP Plan is available on the SCAG website at: <http://www.scag.ca.gov/participate/Pages/CivilRights.aspx>.

## State Planning Requirements

California requires that each metropolitan planning organization adopt a public participation plan, for development of the sustainable communities strategy and an alternative planning strategy (if one is developed), that includes all of the following:

1. Outreach efforts to encourage the active participation of a broad range of stakeholder groups in the planning process, consistent with SCAG's adopted Public Participation Plan;
2. Consultation with congestion management agencies, transportation agencies, and transportation commissions;
3. Workshops throughout the region (A minimum of three public workshops in each county with a population of 500,000 or more) to provide the public with the information and tools necessary to provide a clear understanding of the issues and policy choices;
4. Preparation and circulation of a draft SCS and APS, if one is prepared, not less than 55 days before adoption of a final RTP;
5. At least three public hearings on the draft SCS in the RTP and APS, if one is prepared, held in different parts of the region, if feasible;
6. A process for enabling members of the public to provide a single request to receive notices, information and updates.

Further, SB 375 requires that SCAG conduct at least two informational meetings in each county within the region for members of the board of supervisors and city councils on the SCS and APS, if any. The purpose of the meeting shall be to present a draft of the SCS to the members of the board of supervisors and city council members in that county and to solicit and consider their input and recommendations.

### *Interested Parties*

SCAG intends to encourage involvement of a broad range of people and organizations in the RTP/SCS planning process by reaching out to a wide variety of potential participants.

Per state law, SCAG has included an expanded list of stakeholder groups, or "interested parties."

The following list is an example of target audiences SCAG aims to reach in the region:

- affordable housing advocates
- business organizations
- city managers
- community development representatives
- commercial property interests
- community-based organizations
- educational community and institutions
- elderly and retired persons

- elected officials
- environmental advocates
- freight shippers
- general public
- governmental agencies and non-profit organizations that receive Federal assistance from a source other than the Department of Transportation (DOT) to provide non-emergency transportation services and recipients of assistance under section 204 of Title 23 U.S.C.
- health and wellness representatives
- home builder representatives
- homeowner associations
- landowners
- limited English proficiency populations
- minority and low-income populations
- neighborhood and community groups
- neighborhood councils
- organizations serving rural area residents
- planners
- private providers of transportation
- private sector
- providers of freight transportation services
- public agencies
- public health and wellness representatives
- public sector
- representatives of the disabled
- representatives of transportation agency employees
- representatives of users of pedestrian walkways and bicycle transportation facilities
- representatives of users of public transit
- special interest non-profit agencies
- subregional organizations
- transit operators
- transportation advocates
- Tribal Governments
- women's organizations

### **Bottom-Up Planning and Interagency Consultation**

SCAG's three Policy Committees (Transportation Committee, Energy & Environment Committee and Community, Economic & Human Development Committee) include members appointed to represent the 15 subregional organizations in the SCAG region. Further, the numerous subcommittees, technical advisory committees, working groups, and the AB 1246 process facilitate SCAG's ability to provide a framework for bottom-up planning and more frequent and ongoing participation by interested parties at all stages of the process.

Within the AB 1246 process, the multi-county designated transportation planning agency shall convene at least two meetings annually of representatives from each of the four commissions, the

agency, and the Department of Transportation for the purposes below. The region wide Transportation Agencies CEOs Group is currently fulfilling the function of the AB 1246 process.

1. To review and discuss the near-term transportation improvement programs prior to adoption by the commissions.
2. To review and discuss the Regional Transportation Plan prior to adoption by the agency pursuant to Chapter 2.5 (commencing with Section 65080) of Title 7 of the Government Code.
3. To consider progress in the development of a region wide and unified public transit system.
4. To review and discuss any other matter of mutual concern.

SCAG has a memorandum of understanding (MOU) with the South Coast Air Quality Management District (SCAQMD) on transportation and air quality conformity consultation procedures for the South Coast Air Basin and for the Riverside County portions of the Salton Sea Air Basin and the Mojave Desert Air Basin. Parties to the MOU include: SCAQMD, Los Angeles County Metropolitan Transportation Authority, Orange County Transportation Authority, Riverside County Transportation Commission, San Bernardino Associated Governments, California Department of Transportation (Caltrans), California Air Resource Board, and the Federal Highway Administration.

Likewise, SCAG has an MOU for transportation and air quality conformity consultation procedures with the Ventura County Air Pollution Control District (VCAPCD) for the Ventura County portion of the South Central Coast Air Basin (SCCAB). Parties to the MOU include: VCAPCD, Ventura County Transportation Commission, Caltrans, California Air Resources Board, Federal Highway Administration and the Federal Transit Administration.

To support interagency coordination and fulfill the interagency consultation requirements of the Federal Transportation Conformity Rule, SCAG hosts and participates in the Transportation Conformity Working Group (TCWG). The group meets on a monthly basis to address and resolve regional issues pertaining to transportation conformity for the RTP and FTIP; RTP and TIP amendments; and the region's air quality management plans. TCWG also is the forum for interagency consultation on project-level PM hot-spot analysis. SCAG serves as the regional PM hot spot analysis clearinghouse and maintains records on all projects on the TCWG website.

Participants in the Southern California TCWG include representatives from federal, state, regional and sub-regional agencies such as the United States Environmental Protection Agency (both national and regional representatives), Federal Highway Administration, Federal Transit Administration, California Air Resources Board, California Department of Transportation, Air Quality Management Districts, County Transportation Commissions, Transportation Corridor Agencies, and SCAG.



# APPENDIX B.

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## Programs with established public participation procedures

### Regional Transportation Plan/Sustainable Communities Strategy

The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) represents the vision for Southern California's future, including policies, strategies, and projects for advancing the region's mobility, economy, and sustainability. The RTP/SCS details how the region will address its transportation and land use challenges and opportunities in order to achieve its air quality emissions standards and greenhouse gas reduction targets. SCAG updates the RTP/SCS every four years, as required by law, and SCAG is currently undertaking the development of the 2020 RTP/SCS to provide Southern California with a comprehensive vision for its transportation future to the year 2045.

California Senate Bill 375 (Steinberg, Chapter 728, 2008 Statutes) requires SCAG and other MPOs to engage the region in the development process of the SCS or an Alternative Planning Strategy (APS) through outreach efforts and a series of workshops and public hearings. For the SCAG region these workshops and public hearings include workshops for local elected officials and workshops in each county in the region (at least 16 public workshops.) SCAG will also conduct public hearings on the Draft RTP/SCS in different parts of the region.

SCAG prepares several technical companion documents for RTP/SCS updates. These include a Program Environmental Impact Report on the RTP/SCS per CEQA guidelines, and transportation air quality conformity analyses (to ensure clean air mandates are met) per federal Clean Air Act requirements. Certain revisions to the RTP/SCS may warrant a revision or update to these technical documents.

SCAG also prepares an equity analysis of RTP/SCS updates to determine whether minority and low-income communities in the region share equitably in the benefits of the regional transportation plan without bearing a disproportionate share of the burdens. As an assessment of the region's long-range transportation investment strategy, this analysis is conducted at a regional, program-level scale. This assessment of the long-range plan is intended to satisfy federal requirements under Title VI of the Civil Rights Act and federal policies and guidance on environmental justice. For each update of the RTP/SCS, SCAG will prepare a public participation plan that will provide more information on how the equity analysis will be conducted throughout that update of the RTP/SCS. For additional information on the Environmental Justice public participation procedures, see pages [redacted] of this Appendix B.)

#### Updating and Revising the RTP/SCS

A complete update of an existing RTP/SCS is required at least once every four years. The RTP/SCS also may be revised in between major updates under certain circumstances, as described below.

#### *RTP/SCS Update*

This is a complete update of the most current RTP/SCS, which is prepared pursuant to state and federal requirements. RTP/SCS updates include extensive public consultation and participation involving hundreds of SCAG residents, public agency officials, and stakeholder groups over many months. SCAG's Regional Council and policy committees and other members of the public play key roles in providing feedback on the policy and investment strategies identified in the plan. Local and

Tribal governments, transit operators and other federal, state and regional agencies also actively participate in the development of an RTP/SCS update via existing working groups and ad hoc forums.

### RTP/SCS Amendment

An amendment is a major revision to the RTP/SCS, including adding or deleting a project, major changes in project costs, completion year dates, and/or design concept and scope (e.g., changing project locations or the number of through traffic lanes). An amendment requires public review and comment and is ultimately presented to SCAG’s Regional Council for final approval. An amendment must demonstrate financial constraint and a finding that the change is consistent with federal transportation conformity mandates.

### RTP/SCS Administrative Modification

This is a minor revision to the RTP/SCS for minor changes to project/project phase costs, funding sources, and/or initiation dates. An administrative modification does not require public review and comment, demonstration that the project can be completed based on expected funding, nor a finding that the change is consistent with federal transportation conformity requirements. As with an RTP/SCS amendment, changes to projects that are included in the RTP/SCS’s financially unconstrained strategic plan may be changed without going through this process.

### 2020 RTP/SCS Update Process and Schedule

Developing the long-range plan for the SCAG region takes between two and three years to complete and involves working with six county transportation commissions, 191 cities, and countless other stakeholder organizations and the public. The 2020 RTP/SCS involves goal setting, target setting, growth forecasting, financial projections, scenario development and analysis, and significant issues exploration. Considered at a high level, the 2020 RTP/SCS update will be completed in four phases: 1) Technical Bases & Data Collection; 2) Focus on Major Policy Directions; 3) Establish the Plan & Engage the Public; 4) Adopt 2020 RTP/SCS & PEIR (timeline illustrated in the graphic below.) Throughout the process, SCAG staff will engage the public and local, regional, and state partners to develop the 2020 RTP/SCS to meet current and future transportation needs over the next 25 years. Development of the 2020 RTP/SCS will be guided by an existing federal, state, and regional policy framework consisting of FAST Act/MAP-21, the California Transportation Plan and other relevant statewide plans, and the existing 2016 RTP/SCS.



In addition to the overall RTP/SCS development, SCAG also develops alternative scenarios for the Sustainable Communities Strategies to illustrate the outcomes of different policy and investment choices and identify pathways to meeting GHG reduction targets set by the Air Resources Board. In preparation of the 2020 SCS Scenarios, SCAG will be contracting directly with community based organizations and offering participation support to other organizations that are interested in informing scenario development. SCAG will also be developing a robust engagement tool to be used

by the general public and promoted through our regular outreach methods mentioned above on page. x in order to collect nuanced input on investment and policy priorities.

Throughout the 2020 RTP/SCS development, SCAG's Regional Council; Community, Economic, and Human Development Committee; Energy and Environment Committee; and Transportation Committee will consider the challenges and opportunities facing our region and how to best address them, while considering public input.

The process will need to be flexible and is subject to change, as needed, to reflect and respond to the input received as SCAG moves through the steps of updating the plan. To help direct interested SCAG residents and organizations to participate in key actions or decisions being taken, any changes as well as additional detail will be posted on the [www.scagrtpsc.org](http://www.scagrtpsc.org) website.

### Summary of Key Tasks and Milestones

<b>Step</b>	<b>Tasks</b>	<b>Details</b>	<b>Completion</b>
1	Update Planning Assumptions	<ul style="list-style-type: none"> <li>Review and update regional vision, goals, objectives, and performance measures.</li> </ul>	<i>Spring 2018 - Summer 2019</i>
2	Update Data (through the new horizon year)	<ul style="list-style-type: none"> <li>Update future population, household, and employment growth forecasts.</li> <li>Update land use assumptions.</li> <li>Assess projected land uses and identify major growth corridors.</li> <li>County Transportation Commissions review and update project lists.</li> </ul>	<i>Spring 2017- Winter 2019</i>
3	Transportation Financial Analysis	<ul style="list-style-type: none"> <li>Update revenue forecast.</li> <li>Define cost of multimodal transportation system needs, including operating and maintenance of the existing and future system, plus new and improved facilities and services.</li> <li>Discuss funding tradeoffs.</li> <li>Identify potential funding gap (i.e. limits so that revenues = expenditures).</li> </ul>	<i>Winter 2018 - Fall 2019</i>
4	Land Use/Transportation Scenarios Development	<ul style="list-style-type: none"> <li>Define land use scenarios. Also, assess land use options and compare options to existing local policies.</li> <li>Define transportation network scenarios.</li> <li>Assess scenarios against performance targets.</li> <li>Obtain stakeholder and public feedback on the scenarios and incorporate input.</li> </ul>	<i>Spring 2018 - Spring 2019</i>
5	Issues Exploration	<ul style="list-style-type: none"> <li>Work with stakeholders to explore issues such as public health, active transportation, and natural/farm lands.</li> <li>Incorporate recommendations into the plan (e.g. policies).</li> </ul>	<i>Winter 2017 - Summer 2019</i>

6	Preferred Scenario	<ul style="list-style-type: none"><li>• Based on stakeholder and public input, identify preferred land use and transportation investment strategy.</li><li>• Assess preferred scenario against targets.</li><li>• Approve preferred scenario.</li></ul>	<i>Spring 2019</i>
7	Program Environmental Impact Report	<ul style="list-style-type: none"><li>• Estimate the impact of transportation and land uses on air quality and greenhouse gas emissions within the region.</li></ul>	<i>Fall 2018 - Summer 2019</i>
8	Release Draft 2020 RTP/SCS and Program Environmental Impact Report	<ul style="list-style-type: none"><li>• Regional Council approves the release of the draft 2020 RTP/SCS and associated PEIR.</li></ul>	<i>September 2019</i>
9	Public Outreach and Comment Period	<ul style="list-style-type: none"><li>• Acquire public input on the draft 2020 RTP/SCS and PEIR and respond to public comments.</li></ul>	<i>September 2019 - November 2019</i>
10	Approve Draft 2020 RTP/SCS and Program Environmental Impact Report	<ul style="list-style-type: none"><li>• Regional Council reviews for certification PEIR for the 2020 RTP/SCS and review for approval the final 2020 RTP/SCS.</li></ul>	<i>April 2020</i>

## Congestion Management Process

SCAG is required by federal regulations to prepare a congestion management process (CMP) for the SCAG region that includes strategies for managing travel demand, traffic operational improvements, public transportation improvement, etc. SCAG adopts a CMP approximately every two years, with the results of this technical evaluation used to inform SCAG decisions on program and investment priorities, including the RTP/SCS.

## Program Environmental Impact Report

SCAG will prepare a Program Environmental Impact Report (PEIR) beginning in the fall of 2018 through summer 2019. The PEIR will evaluate the potential environmental impacts associated with the implementation of the 2020 RTP/SCS.

The 2020 PEIR will focus on a region-wide assessment of existing conditions and potential impacts as well as broad policy alternatives and program-wide mitigation measures. Potential or probable environmental effects of individual projects included in the 2020 RTP/SCS Project List will not be specifically analyzed in the PEIR. The PEIR will serve as a first-tier document for later CEQA review of individual projects included in the program. For large scale planning approvals (such as the RTP/SCS), where project-level environmental analyses will subsequently be prepared for specific projects broadly identified within a PEIR, the site-specific analysis can be deferred until the project level environmental document is prepared, provided deferral does not prevent adequate identification of significant effects of the planning approval at hand.

SCAG, as the lead agency of the 2020 RTP/SCS, is required to file all CEQA notices related to the PEIR (i.e. Notice of Preparation (NOP), Notice of Availability (NOA), Notice of Determination (NOD)) to the Office of Planning and Research and with the county clerk in each county within the project boundaries (which includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties) for public review for 30-60 days. All CEQA notices are also e-mailed out to SCAG stakeholders through SCAG's e-mailing list and posted at SCAG's main office in Los Angeles and regional satellite offices in each of the other five counties for the full comment period to solicit public comments. Public comments received during the NOP stage, the first stage in developing an environmental document of the CEQA process, will be incorporated into the Draft PEIR and public comments received during the NOA stage, the second stage, will be responded to in the Final PEIR. This process ensures public comments are collected and addressed per CEQA requirements.

In summary, the PEIR will serve as an informational document to inform decision-makers and the public of the potential environmental consequences of approving the proposed plan by analyzing the projects and programs on a broad regional scale, not at a site-specific level of analysis. Site specific analysis will occur as each project is defined and goes through individual project-level environmental review.

## Regional Housing Needs Assessment

In addition to the tasks outlined above to develop the 2020 RTP/SCS, SCAG is required to update the eight-year Regional Housing Needs Assessment (RHNA). The RTP/SCS must demonstrate on a regional level, areas sufficient to house all the population of the region, including the eight-year projection of the RHNA.

Both the RTP/SCS and RHNA use the local input survey as the basis for future demographic projections, including household growth. The next RHNA cycle, also known as the 6th cycle, will cover the planning period October 2021 through October 2029. The latest SCAG can adopt the 6th RHNA allocation is October 2020, but SCAG is looking at alternative schedules for a possible earlier adoption date, possibly to coordinate with the adoption of the 2020 RTP/SCS.

## Federal Transportation Improvement Program

### FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM

SCAG's Federal Transportation Improvement Program (FTIP) is a capital listing of all transportation projects proposed over a six-year period. The listing identifies specific funding sources and funding amounts for each project. The FTIP must include all transportation projects that are federally funded, and/or regionally significant regardless of funding source or whether subject to any federal action.

The FTIP includes improvements to projects on the state highway, local arterial, bridge, public transit, rail, bicycle, pedestrian, safety, maintenance, operational and planning projects to name a few. The projects are submitted to SCAG by the six County Transportation Commissions. SCAG analyzes the projects to ensure that they are consistent with state and federal requirements. Federal law requires the FTIP be consistent with the RTP.

The following outlines SCAG's strategies, procedures and techniques for public participation on the FTIP. SCAG intends to update this section of the Appendix as needed prior to commencing each FTIP cycle to reflect appropriate changes.

#### 1. FTIP Public Participation Process in the SCAG Region

SCAG has a Memorandum of Understanding (MOU) with transit operators and each of the County Transportation Commissions (CTCs) within the SCAG Region. These MOUs specify the role of the transit operators and CTCs with respect to approval of transportation projects utilizing federal, state highway, and transit funds within their respective jurisdiction. The County Transportation Commissions are also responsible for transportation programming and short range planning in their respective counties. The County Transportation Commissions transmit their approved County TIP to SCAG. The public participation process and coordination is a tiered process within the SCAG region. This tiered process initiates the public participation process at the CTC's county TIP development stage, which occurs long before the development of the SCAG FTIP.

There are several opportunities for the public to review and comment on projects and programs during the development of each county TIP and approval of the SCAG FTIP. These public participation opportunities are described below.

##### A. Project Identification

Public participation begins at the local agency level by identifying projects and associated work scopes based on local and regional transportation needs. Newly identified projects are commonly placed on funding needs lists, funding plans or capital improvement program plans and programs that identify projects to be funded. These lists, plans and programs are adopted by local agency boards (mostly elected officials) in meetings open to the general public. Stakeholders, interest groups and the general public have the opportunity to review and comment on these projects and local plans prior to local agency board approvals.

##### B. Project Funding

The general public, interested parties and stakeholders have an opportunity to review and comment on projects and programs during the allocation of funds by local agencies including cities, counties, special districts, and county transportation commissions (CTCs).

The process of assigning specific funding sources to projects normally occurs in meetings open to the general public by public policy boards. For example, the CTCs in the SCAG region conducts a "call for projects" when funding under their control (federal, state and/or local) is available for programming. Local agencies apply and compete for available funding based on adopted eligibility guidelines consistent with federal, state and local county requirements. Candidate projects usually have gone



through an initial public review process and are included in a local agency capital improvement needs programs or plans. The CTCs work through their respective committee review process to develop a list of projects recommended for funding and adoption by each respective policy board. CTCs review committees are comprised of local agency staff (stakeholders and interested parties), and in some cases include public elected officials. Review committee meetings are publicly noticed. The recommended project lists approved by the committees are forwarded to the respective policy boards for approval. Projects proposed for funding are made available for review by the general public, stakeholders and interested parties in advance of adoption by the CTCs policy boards. All allocation of funds by the policy boards occur in publicly noticed meetings open to the general public.

The allocation of public funds to projects by other entities meet the public review requirements that are consistent with the federal, state and/or local laws that govern the allocation of the funds.

C. County Transportation Improvement Program (TIP) Development

The CTCs develop their respective TIPs based on FTIP Guidelines prepared by SCAG in consultation with the CTCs, SCAG's TCWG, federal and state agencies staff, with approval by SCAG's Regional Council. The FTIP is the implementing document of the RTP/SCS. The CTCs' submittal of their county TIP to SCAG is their county implementation plan which is incorporated in its entirety into the SCAG FTIP. All projects programmed in County TIPs have been previously approved for funding by the entity responsible for allocating the project funds. When submitting County TIPs to SCAG, each CTC is required to adopt a financial resolution which certifies that it has the resources to fund the projects in the TIP and affirms its commitment to implement all projects. The financial resolution is approved by each policy board in publicly noticed meetings open to the general public.

D. SCAG FTIP Development

SCAG develops the FTIP for the six-county region based on the County TIPs prepared and submitted by the CTCs described above in Section iii. The Draft SCAG FTIP is noticed for a minimum 30-day public review, and public hearings are held at the SCAG office and where possible these public hearings will be available via video or teleconference. SCAG also conducts public outreach efforts through social media outlets. The Draft SCAG FTIP documents are made available for review and comment by stakeholders, interested parties and the general public through the SCAG internet website at <http://ftip.scag.ca.gov/Pages/default.aspx> and at public libraries throughout the six-county region prior to the public hearing.

In addition to the public hearings, SCAG committees and working groups also review and discuss the draft FTIP. These SCAG groups include the Executive Administration Committee, the Transportation Committee (TC), the Transportation Conformity Working Group (TCWG), and the Energy and Environment Committee (EEC). The SCAG Regional Council takes final action when they adopt the FTIP.

E. FTA Program of Projects

The designated recipient of FTA Section 5307 funds must develop a Program of Projects (POP). The POP is a list of proposed FTA funded projects that must undergo a public review process. Guidance provided by FTA allows the FTIP to function as the POP as long as the public is notified through SCAG's public notice that the FTIP public review process satisfies the public participation requirements of the POP. Once the FTIP is approved, the document will function as the POP for recipients of FTA funds in the SCAG region. SCAG's public participation process for the FTIP is intended to satisfy FTA Section 5307 funding recipients' public participation process for the POP.

F. SCAG FTIP Updates

The FTIP is amended throughout the year. This process is similar to developing the formal FTIP. Proposed amendments to the adopted FTIP are submitted by the CTCs to SCAG. After SCAG has completed its analysis of the proposed change(s) to the FTIP ensuring consistency with the various programming rules and regulations, SCAG electronically posts the proposed change(s) for a 10-day public review and comment period on the SCAG website at <http://ftip.scag.ca.gov/Pages/default.aspx>. In addition to posting the amendment information on the web, a notice is sent to the TCWG as part of the FTIP amendment public review process.

## 2. Other FTIP Public Participation strategies, procedures and techniques

- A. Enhance Website Capabilities:
  - I. Utilize SCAG's web site to provide information, announce draft and final program releases, encourage feedback and comments from the public, make draft and final programs and corresponding documents available, provide contact information, inform of upcoming events and meetings, post meeting agendas and minutes
  - II. Ensure that the information available is timely, easy-to-understand and accessible and that the website is compliant with the 1990 Americans with Disabilities Act.
- B. Update Contact Databases and Advisory Groups:
  - I. Review and update mailing lists for outreach efforts.
  - II. Expand contact databases to include all Interested Parties identified in the Plan.
- C. Coordinate Outreach Efforts with other Stakeholder Organizations:
  - I. Support interagency coordination by continuing to host and participate in the monthly TCWG meetings.
  - II. Mail Notice of Draft FTIP availability to the stakeholders at the local, state and federal level to solicit their comment and input to the final FTIP. Ensure that the public comment period for the program is at least 30 days.
  - III. Participate in regular meetings with the county transportation commissions in the coordination of the draft and final FTIP.
- D. Conduct Public Hearings:
  - I. Announce public hearings in printed materials, on SCAG's website
  - II. Hold public meetings at convenient and accessible locations and times.
  - III. Conduct at least two public hearings on the draft FTIP.
  - IV. Explore new opportunities using state-of-the-art communications and information technology for reaching remote audiences.
- E. Maintain a Log of Outreach Efforts:
  - I. Maintain a log of all agency-wide outreach presentations.
  - II. Review and consider all public comments in the regional transportation planning process.
  - III. Record, track and maintain a log of comments and SCAG's response to the comments
  - IV. Respond to all comments received in a timely manner.

## 3. Annual Listing of Projects

Federal regulations require SCAG to develop an annual listing of projects (including investments in pedestrian walkways and bicycle transportation facilities) for which federal funds were obligated in the preceding program year. SCAG, in consultation and coordination with the State, county transportation commissions, and public transportation operators throughout the SCAG region, compiles the information and produces the annual listing of projects. The annual listing of obligated projects may be found on the SCAG website at <http://ftip.scag.ca.gov/Pages/default.aspx>.



#### 4. FTIP Amendments

For the FTIP, the following summarizes the categories of amendments identified by FHWA for the FTIP and the public participation requirements for each amendment type.

- A. Category 1. Administrative Modification  
An administrative modification includes minor changes to project cost, schedule, and project description changes without affecting the scope, and/or funding sources. Please see the Federal Statewide Transportation Improvement Program (FSTIP) and Federal Transportation Improvement program (FTIP) Amendment and Administrative Modification Procedures for a complete definition of an administrative modification and eligibility.
- B. Category 2. Amendment – Changes that do not impact the existing conformity determination.  
The Amendment category may include changes that are not eligible under an administrative modification.
- C. Category 3. Amendment – Relying on the existing Conformity Determination.  
This amendment may include adding a project or a project phase to the program. This amendment category consists of projects that are modeled and are included in the regional emissions analysis.
- D. Category 4. Formal Amendment – New Conformity Determination.  
This amendment may include adding or deleting projects that are not currently included in the regional emissions analysis or part of the existing conformity determination. This amendment may involve adding or deleting projects that must be modeled for their air quality impacts: significantly changing the design concept, scope; or schedule of an existing project.
- E. Category 5. Technical Amendment – Changes to project information not required to be included in the FTIP per federal requirements. Changes are not subject to an administrative modification or an amendment such as changes to project codes, and changes to correct typographical errors. These technical corrections do not impact project scope or cost.

## Public Hearing – Public Review & Comment Period Requirement

Amendment Category	Public Hearing Requirements	Public Review Period (# of days)
<b>Category 1 - Administrative</b>	n/a	n/a
<b>Category 2 - Amendment Changes that do not impact the existing conformity determination</b>	No	1
<b>Category 3 Amendment relying on existing conformity determination</b>	No	10
<b>Category 4 – Formal Requires a new conformity determination</b>	Yes	30
<b>Category 5 - Technical Correction Not subject to funding agency approval for public review</b>	No	n/a

## FTIP Amendment and Administrative Modification Approval Procedures – SCAG Executive Director Authority

### *FTIP Amendment Procedures*

As part of the TIP approval process, the SCAG Regional Council granted authority to SCAG's Executive Director or designee to approve Federal Transportation Improvement Program (FTIP) amendments and associated conformity determination and to transmit to the state and federal agencies amendments to the most currently approved FTIP. These amendments must meet the following criteria:

- Changes that do not affect the regional emissions analysis.
- Changes that do not affect the timely implementation of the Transportation Control Measures.
- Changes that do not adversely impact financial constraint.
- Changes consistent with the adopted Regional Transportation Plan.

Amendments triggered by an RTP amendment must be approved by the Regional Council

### *FTIP Administrative Modification Procedure*

SCAG's Regional Council has the discretion to delegate authority to SCAG's Executive Director to approve FTIP Administrative Modifications to the Federal State Transportation Improvement Program (FSTIP) consistent with approved FSTIP/FTIP Administrative Modification and Amendment Procedures and as may be amended. Administrative Modifications are minor project changes that qualify under the FSTIP/FTIP Administrative Modification and Amendment Procedures. Because FTIP Administrative Modifications are considered minor changes, public review is not required.

The following procedures apply to this delegation of authority:

- SCAG will send copies of the approved administrative modification to Caltrans, FHWA, and FTA.
- Once the administrative modification is approved by SCAG, the administrative modification will be deemed part of the Federal State Transportation Improvement Program (FSTIP).
- SCAG will demonstrate in a subsequent amendment that the net financial change from each administrative modification has been accounted for.
- Caltrans will conduct periodic reviews of SCAG's administrative modification process to confirm adherence to the procedures. Noncompliance with the procedures will result in revocation of the MPO's delegation

## Environmental Justice Program

In 1994, Executive Order 12898 directed every federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on minority and low-income populations. Reinforcing Title IV of the Civil Rights Act of 1964, which addresses minority populations, this executive order ensures that every federally funded project nationwide consider the human environment when undertaking the planning and decision-making process.

As the Metropolitan Planning Organization for six Southern California counties, SCAG developed a policy to ensure that environmental justice principles are an integral part of the transportation planning process, including the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). Additionally, as a government agency that receives federal funding, SCAG is required to conduct an environmental justice analysis for its RTP/SCS. SCAG's environmental justice program has two main elements: technical analysis and public outreach. As part of SCAG's environmental justice program, the agency also:

- Provides early and meaningful public access to decision-making processes for all interested parties, including minority and low-income populations;
- Seeks out and considers the input of traditionally underrepresented groups, such as minority and low-income populations, in the regional transportation planning process;
- Takes steps to propose mitigation measures or consider alternative approaches for the SCAG region when disproportionately high and adverse impacts on minority or low-income populations are identified; and
- Continues to evaluate and respond to environmental justice issues that arise during and after the implementation of SCAG's regional plans.

SCAG also prepares additional companion documents, or appendices, to help support or add to the RTP/SCS. The environmental justice technical analysis and public outreach methodology are included in the RTP/SCS Environmental Justice Appendix.

Early and continuous public outreach and input from SCAG's environmental justice stakeholders help SCAG prioritize and address needs in the region. Public outreach for environmental justice issues will be conducted concurrently with the RTP/SCS public outreach and development process. SCAG will hold various kick-off meetings, outreach workshops, focus group meetings and interviews throughout the RTP/SCS development process. Specifically, SCAG will hold:

- At least one (1) kick-off meeting at the beginning of the RTP/SCS development at the SCAG Headquarters located at Downtown Los Angeles (DTLA);
- At least four (4) outreach workshops during the RTP/SCS development and EJ Appendix development process. At least two (2) of the meetings will be held at SCAG's DTLA Headquarters while at least two (2) will be held in other geographical areas based on needs expressed by stakeholders;
- Several focus group discussions with various SCAG stakeholders to discuss EJ topics and concerns and the development of the EJ Appendix; and
- Interviews for SCAG stakeholders that cannot attending focus group meetings to discuss EJ topics and concerns and the development of the EJ Appendix.

All public meetings and workshops aim to be accessible to all groups and individuals interested or concerned with environmental justice. In efforts to make these meetings and workshops more accessible, meeting and workshop materials can be provided in different languages to engage individuals who are not proficient in English. Meeting details will be available to the public approximately 30 days before the meeting date to allow for adequate planning. Videoconferencing at SCAG's satellite offices (in Imperial, Orange, Riverside, San Bernardino, and Ventura Counties) will be made available to ensure all populations within the SCAG region can be reached.

Comments and input gathered during the public outreach process will be incorporated into the Environmental Justice Appendix. There will also be another round of public review and comment when the RTP/SCS and its associated appendices, including the Environmental Justice Appendix, are released.

The overall environmental justice outreach process encourages the public, with many opportunities to voice out and be involved, to discuss and address environmental justice issues and shape SCAG's environmental justice program.

## **OVERALL WORK PROGRAM**

Funding for SCAG's metropolitan planning activities are documented in an annual Overall Work Program (OWP) (also known as a Unified Planning Work Program), pursuant to federal requirements, 23 CFR 450.308(b)-(c), and Caltrans guidance.

The OWP is developed each fiscal year, and details the agency's planning and budgetary priorities for the following fiscal year. SCAG's federal and state funding partners (FHWA, FTA and Caltrans) must approve SCAG's OWP each year before it takes effect.

The following describes SCAG's strategies, procedures and techniques with respect to public participation on the OWP.

1. Adopt OWP Preparation Schedule and Work Programs Outcomes: (September-October)
  - a. Regional Council adopts the OWP preparation schedule and work program outcomes for the coming fiscal year.
2. Conduct a Budget Workshop: (February).
  - a. SCAG staff conducts a Budget Workshop for the Regional Council and members of the public.
3. Distribute Draft OWP: (March).
  - a. The Regional Council approves the Comprehensive Budget which includes the draft OWP. The draft OWP is distributed to all Regional Council members and the Regional Council approves the release of the document for a minimum 45-day public comment and review period. The draft OWP is also placed on SCAG's website.
4. Distribute the Draft OWP for Public Comments: (March).
  - a. Staff mails letters to over 300 City Planners, Planning Directors and other Planning representatives within the SCAG region, including subregional coordinators, CTCs and

transit operators, encourages their feedback on the draft OWP, and notifies them of the availability of the draft document on SCAG's website.

5. Review and Consider Comments Received in the Final OWP Deliberations: (April).
  - a. Staff reviews and considers all public comments in the OWP planning process.
  - b. Staff records, tracks and maintains a log of comments and SCAG's response to the comments.
6. Adopt the Final Comprehensive Budget and Resolution Authorizing the Submittal to Funding Partners: (April).
  - a. The Regional Council adopts the Final Comprehensive Budget and Resolution authorizing the submittal of the Final OWP to Caltrans and other funding agencies as necessary for approval. Caltrans must submit the recommended Final OWP to FHWA/FTA by June 1 of each year.

DRAFT



## **Technical Working Group**

# **Agenda Item 4**



**FOR IMMEDIATE RELEASE**

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Jan. 26, 2018

**Natural Resources Agency Seeks Public Comment on Proposed Update to State's Environmental Review Process**

SACRAMENTO -- The California Natural Resources Agency today issued a [Notice of Proposed Rulemaking](#) on updated state guidelines for implementing the California Environmental Quality Act (CEQA), including new regulations that will streamline review of projects that improve air quality and public health.

Public comment on the proposal is due by **5 p.m. March 15**, and public hearings will be held in Sacramento and Los Angeles as follows:

**Sacramento**

March 15, 2018

1:30 p.m.-4:30 p.m.

California Energy Commission, Rosenfield Hearing Room, 1516 9th Street, Sacramento  
(This hearing will be webcast.)

**Los Angeles**

March 14, 2018

1:30 p.m.-4:30 p.m.

California Science Center, Annenberg Building, Muses Room, 700 Exposition Park Dr.,  
Los Angeles

Proposed changes to the CEQA guidelines address nearly every step in the environmental review process to improve efficiency and better protect natural resources. The regulations align CEQA rules with other state environmental policies and goals, including reductions in greenhouse gas emissions.

Examples of proposed changes include:

- Updated exemptions for residential and mixed-use developments near transit and redeveloping vacant buildings.



- Clarified rules to make it easier to use existing environmental documents to cover later projects.
- New provisions to address energy efficiency and the availability of water supplies.
- Simplified requirements for responding to comments.
- Modified provisions to reflect recent CEQA cases addressing baseline, mitigation requirements and greenhouse gas emissions.

The changes include provisions implementing SB 743 (Steinberg) of 2013 that would simplify CEQA analysis of a project's transportation impacts by focusing analysis on "vehicle miles traveled" (VMT). VMT already is used in CEQA to study other impacts such as air quality, greenhouse gas emissions and energy use, and this change provides consistency with those rules. The new rules make it clear that projects that reduce the number of miles that cars travel – such as new bike lanes or new public transportation infrastructure – generally have few environmental impacts and can be expedited under state law.

While cities already are updating their own CEQA procedures for transportation analysis in anticipation of this change, public agencies that need time will have two years to prepare for the transition. The proposal also provides flexibility for agencies to use other metrics to measure the effects of roadway capacity projects.

These proposed changes to the CEQA Guidelines were developed over the past four years with extensive input from the public, stakeholders and legal experts.

Following the public hearings, the Natural Resources Agency will consider all comments on the proposal and may make appropriate changes. At the end of the rulemaking process, including developing written responses to comments, the Natural Resources Agency will submit the package to the Office of Administrative Law. More on the proposed update to the CEQA Guidelines is available [here](#).

###

# Proposed Updates to CEQA Guidelines

## Preliminary Staff Comments for Discussion and Input Only (2/13/18)

### 1. Clarification on Environmental Baseline (Proposed Amendments to Section 15125)

OPR's package proposes to amend subdivision (a) of section 15125 regarding the environmental setting. Specifically, OPR's package proposes to add a statement of purpose and three subdivisions to subdivision (a).

In the body of subdivision (a), OPR proposes to add a sentence stating that the purpose of defining the environmental setting is to give decision-makers and the public an accurate picture of the project's likely impacts, both near-term and long-term. The purpose of adding this sentence to subdivision (a) is to guide lead agencies in the choice between alternative baselines. When in doubt, lead agencies should choose the baseline that most meaningfully informs decision-makers and the public of the project's possible impacts (Page 98).

In the body of subdivision (a)(1), OPR's package sets forth a general rule: "normally, conditions existing at the time of the environmental review should be considered the baseline." However it further states that "the lead agency may describe both existing conditions as well as future conditions" (Page 99).

In the body of subdivision (a)(2), OPR's package sets forth the exception to the general rule and the conditions allowing lead agencies to use an alternative baseline. Subdivision (a)(2) explains that existing conditions may be omitted in favor of an alternate baseline where "use of existing conditions would be either misleading or without informative value to decision-makers and the public" (Page 99). It further clarifies that if future conditions are to be used, "they must be based on reliable projections grounded in substantial evidence" (Page 100).

In the body of subdivision (a)(3) OPR's package specifies that hypothetical conditions may not be used as a baseline. Specifically, the subdivision states that "lead agencies may not measure project impacts against conditions that are neither existing nor historic, such as those that might be allowed under permits or plans" (Page 100).

SCAG appreciates OPR's efforts on providing additional language with regard to baseline and base year existing conditions. There has been an on-going debate as to how agencies should properly evaluate long range plans. The updated guidelines appear to give the lead agency the freedom to choose either setting for assessing existing conditions, as appropriate.

However, further clarifications are needed for the following questions:

- If the lead agency decides to describe both existing and future conditions, and if future conditions resulted in less than significant impacts, whereas existing conditions resulted in significant impacts, could the lead agency override the significant impact determination under existing conditions and conclude that overall impacts would be less than significant, as long as they provided substantial evidence and data (i.e., regulations, modeling and emerging technology), to justify their statement?
- Additionally, is the lead agency required to mitigate for impacts under existing conditions, even though they would be unnecessary for future conditions?

## **2. Clarification on Tiering**

OPR's package proposes to amend section 15152(h) to further assist lead agencies to determine if tiering is appropriate for a given project. OPR proposes to rewrite this section that tiering is only "one of several streamlining mechanisms that can simplify the environmental review process" (Page 25). The proposed amendment states: "The rules in this section govern tiering generally. Several other methods to streamline the environmental review process exist, which are governed by the more specific rules of those provisions. Where other methods have more specific provisions, those provisions shall apply, rather than the provisions in this section. Where multiple methods may apply, lead agencies have discretion regarding which to use" (Page 27). Additionally, proposed amendments under section 15152(h) now include "infill projects (Section 15183.3)" for potential projects qualified for tiering (Page 28).

SCAG appreciates OPR including "infill projects" as potential projects qualified for tiering. Local jurisdictions who wish to tier off of their Specific Plan PEIRs or gain CEQA exemptions for Transit Oriented Development projects would highly benefit from this addition.

OPR's efforts on providing clarification for tiering and CEQA streamlining is much appreciated. Redundancy has become a major issue when conducting environmental analysis. However, it would be helpful if the CEQA guidelines were revised to describe all CEQA streamlining options under one unified section. Currently, CEQA streamlining and tiering is described under Section 15152, 15183, Appendix M and other sections throughout the CEQA guidelines. Streamlining the Guidelines itself would provide clarity to a project applicant.

While not applicable to the CEQA guidelines itself, it would be helpful if OPR hosted workshops with respect to CEQA streamlining and providing materials (i.e., examples, flowcharts) to lead agencies. Educating lead agencies and CEQA practitioners would facilitate the environmental review process.

## **3. Promoting the use of existing regulatory standards in the CEQA process**

OPR's package promotes the use of existing regulatory standards in the CEQA process. OPR proposes to update sections 15064 and 15064.7 to expressively provide that lead agencies may use thresholds of significance in determining significance, and that some regulatory standards may be appropriately used as thresholds of significance.

SCAG has been a proponent of using existing regulatory standards in the CEQA process and has done so for the 2016 RTP/SCS Programmatic Environmental Impact Report. We believe that using regulatory standards for determining significance would bring cohesiveness and consistency throughout the region. By doing so, not only are we able to reach statewide goals together but are able appropriately assess statewide impacts from a macro (program level) to micro (project level) scale with ease. However, when using existing regulatory standards, it is not simply enough to state a standard and determine that a project would result in less than significant impacts, should it fall within or below the standard. The usage of regulatory standards to determine a level of significance should be fully explained and supported by adopted policies and scientific evidence within the CEQA document.

#### **4. Discussion of energy based impacts under Appendix G**

OPR's package proposes to amend Section 15126.2 to discuss energy based impacts under Appendix G.

SCAG appreciates OPR's effort into integrating energy based impact discussion under Appendix G. Appendix F of the CEQA guidelines has contained guidance on energy analysis for decades but was often overlooked. Even though Appendix F was revised in 2009 to clarify that analysis is mandatory, the discussion of energy impacts was limited. SCAG believes that in order to reach our greenhouse gas emissions reduction targets for the future, it is important that we identify any wasteful energy use and identify appropriate mitigation measures to reduce emissions and to promote sustainable features for any given project.

#### **5. Updates to evaluating greenhouse gas impacts (Proposed Amendments to Section 15064.4)**

OPR's package proposes to amend Section 15064.4. First, the proposed amendments clarify that a project must make a good faith effort to estimate or describe a project's greenhouse gas emissions. More importantly, the focus of the lead agency's analysis should be on the project's effect on climate change (Page 87). This clarification is necessary to avoid an incorrect focus on the quantity of emissions, and in particular how that quantity of emissions compare to global emissions (Page 88). OPR's package further clarifies that lead agencies should consider the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change (Page 88). Second, the proposed amendments clarify that lead agencies should consider a timeframe for the analysis that is appropriate for the project, due to the fact that in some cases, it would be appropriate for agencies to consider a project's long-term greenhouse gas impacts, such as for projects with long time horizons for implementations (Page 88). Third, the proposed amendments clarify that an agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes (Page 88). Fourth, the proposed amendments clarify that an agency's analysis may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change (Page 89).

SCAG supports OPR's proposed amendments on evaluating greenhouse gas impacts. As mentioned previously, it is important that we work towards reducing emissions. In the past, when greenhouse gas emissions were evaluated, emissions were often analyzed with little or no mention of climate change. Proposed changes would ensure that we focus on a projects contribution (or no contribution) to climate change, thereby allowing us to quantify our distance to the region's greenhouse gas emissions target goals. SCAG agrees that an appropriate timeframe setting is important when evaluating greenhouse gas emissions. Projects that have significant development or operational periods and have potential to emit significant amount of greenhouse gas emissions, should have a level of analysis that captures a longer timeframe as it allows us to determine if we can achieve long term State targets in reducing greenhouse gas emissions.

SCAG also agrees that an agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes. The purpose of a CEQA document is to fully inform the public and decision

makers on a project's potential impacts. Therefore, it is important that when conducting CEQA documentation, agencies should make the best effort to use the best data and modeling tools available. This is highly critical as scientific research and knowledge is a dynamic process, which is continuously evolving rather than a static one. It is also important that discussion and analysis revolves around existing and new regulatory standards that are and were codified during the preparation of the environmental document. As referenced before, should an agency decide to use regulatory standards as a threshold for significance, standards should be fully explained and supported by adopted policies and scientific evidence within the CEQA document.

Since the enactment of Executive Orders B-16-2012, B-30-15, S-3-04, Assembly Bill 32 and the codification of Senate Bill 32, there has been an on-going debate as to how to appropriately analyze greenhouse gas emission impacts, particularly cumulative impacts. Greenhouse gas emissions by nature are "global", as opposed to localized with respect to cumulative impacts. To clarify, greenhouse gas emission impacts are not confined within the boundaries of a project area, a city or even a state, but contribute to a global inventory by nature, thus making it difficult to analyze within CEQA as it hard to bridge the gap of analysis for a local project (i.e. manufacturing factory, small refinery, or retail projects) and its impacts on the state or the entire world. SCAG requests that OPR work with MPOs and local jurisdictions to develop a sound roadmap as to how to properly analyze cumulative greenhouse gas emission impacts, in an effort to facilitate the CEQA process, minimize litigation and to achieve statewide targets.

#### **6. Discussion of Project Benefits (Proposed Amendments to Section 15124)**

OPR's package proposes to amend subdivision (b) of Section 15124. Currently, subdivision (b) states that a project description shall include a statement of objectives sought by the project. The proposed language has been revised to state: "The statement of objectives should include the underlying purpose of the project and may discuss the project benefits" (Page 152).

SCAG supports the proposed amendments to Section 15124. Allowing a discussion of project benefits within the project description would be beneficial to lead agencies. Previously, project benefits have been discussed solely within the Findings of Facts and Statement of Overriding Considerations Section within the Final Environmental Impact Report. Unfortunately, this section is highly overlooked from the general public. As such, readers often do not understand as to why a certain project is being developed and will often focus on the environmental impacts, thus creating a negative bias. By describing the project benefits up front, the reader will be offered a more balanced perspective, prior to making their decision.

#### **7. Discussion of Wildfire Impacts under Appendix G**

OPR's package proposes to amend Appendix G by adding the discussion of wildfires as one of its primary environmental topics.

SCAG supports proposed amendments to Appendix G, allowing for a discussion of wildfire impacts. Over the past decades, the State of California has experienced a multitude of wildfires. The wildfires of 2017 were considered the most destructive fire events in California's history. According to the California Department of Forestry and Fire Protection, a total of 9,133 fires burned through 1,381,405 acres, which resulted in an economic toll of at least \$180 billion. As such, it is clear that a discussion revolving around wildfire impacts is greatly needed. The discussion of wildfire impacts will be beneficial, as it will potentially inform the general public about potential wildfire risks. Additionally, should any

potential risks or impacts be identified, appropriate mitigation measures to minimize such hazards would be developed.

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# Proposed SB 743 Implementation Guidelines

## Preliminary Staff Comments for Discussion & Input Only (2/13/18)

1. SCAG appreciates the efforts OPR staff have made over the past four years to ensure that the process of guidelines development for the implementation of SB 743 are as inclusive and participatory as possible. On numerous occasions, OPR staff have reached out, in a meaningful manner, to obtain feedback and input from stakeholders throughout the state. In collaboration with OPR staff, SCAG has hosted six stakeholder workshops during the guidelines development process to receive input.
2. It is clear that this ground-breaking legislative initiative will have far-reaching impacts on the way land use and transportation planning is conducted throughout California, and it has been critical that the concerns and feedback of our regional partners and implementing agencies be heard and addressed throughout this extended process. OPR has demonstrated generosity of their staff time and resources to ensure that the implementation of these new regulations are successful, without placing an undue burden on implementing agencies.
3. One major modification provided by OPR in its final proposal was to make VMT analysis for highway capacity projects optional rather than required. This significant accommodation was made in direct response to the expressed concerns of many of our regional stakeholders. Highway capacity improvement projects that are already included in the adopted SCAG RTP/SCS are critical to our region's long-term mobility objectives, and collectively contribute to the Plan's overall regional sustainability and climate goals.
4. The proposed VMT-based analysis for the assessment of potential transportation impacts pursuant to SB 743 is of great interest to SCAG and to our local jurisdictions and stakeholders. SCAG believes that the proposed methodological change, from the previously used 'Level of Service' (LOS) analysis, will ultimately serve to enhance the ability of our state and our region to achieve our GHG reduction goals, while still preserving our critically needed regional mobility investments.
5. It is critical that lead agencies be provided sufficient time to adequately prepare for the methodological changes that will be required through implementation of SB 743. The currently targeted implementation date of January 1, 2020, as prescribed in the proposed new Guidelines Section 15064.3 (c), 'Applicability', should be revised to allow for a full two-year implementation opt-in period from the effective date of the final rule-making.
6. Since these regulations represent a substantial change in methodology from previously used CEQA transportation impact analysis processes, it is critical that, after rule adoption, the state provide additional implementation assistance and guidance opportunities to our local jurisdictions for enacting the new procedures at the local level. The establishment of a set of best practices for implementation of the new methodology over a variety of settings and project types will assist lead agencies to evaluate and anticipate potential impacts of their planned projects. SCAG has already engaged with other MPOs in this direction and looks forward to assisting OPR in this effort.

7. The Technical Advisory states that if a local jurisdiction uses city VMT per capita, the "Proposed development referencing city VMT per capita must not cumulatively exceed the number of units specified in the SCS for that city, and must be consistent with the SCS." (Technical Advisory, Page 12, 'Recommended Numeric Thresholds for Residential, Office, and Retail Projects', November, 2017). Since total number of housing units is not a variable in SCAG's growth forecasts, it is not included in the adopted SCS. SCAG uses the variable of "households", or occupied housing units, which is a slightly smaller subset of housing units, depending upon the vacancy factor. Therefore, there is no number of units inventory for a local jurisdiction in SCAG's SCS from which to make a determination as to whether or not a proposed project exceeds the number of units specified in the SCS. Please clarify this methodological ambiguity in the SB 743 guidelines.

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