4.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires an Environmental Impact Report (EIR) to describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or substantially lessen significant environmental impacts while attaining most of the project objectives.[1] This chapter sets forth potential alternatives to the Plan and provides a combination of quantitative and qualitative analysis of each alternative and a comparison of each alternative to the Plan. Plan alternatives are evaluated as to how well they achieve the goals, policies, and objectives, the extent of their environmental impacts compared to the Plan, and whether or not they reduce or eliminate significant impacts caused by the Plan.

4.1 RATIONAL FOR ALTERNATIVES SELECTION

Key provisions of the *State CEQA Guidelines* pertaining to the alternatives analysis are summarized below.[2]

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

- The EIR shall include a brief discussion of the rationale for selecting alternatives to be discussed and should identify any alternatives that were considered but were rejected as infeasible during the scoping process and briefly explain the reason underlying the lead agency's decision. Among others, the following factors may be used to eliminate alternatives from detailed consideration in an EIR: (1) failure to meet most of the basic project objectives; (2) infeasibility, or (3) inability to avoid significant environmental impacts.

- The No Project Alternative shall be evaluated along with its impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. When the project involves an update to an existing land use or regulatory plan, the "no project" alternative will be a continuation of the existing plan, policy or operation into the future.

1 *CEQA Guidelines* § 15126.6. 2005

2 *CEQA Guidelines* § 15126.6, 2005

The projected impacts of the plan are compared to the impacts from the continuation of the existing plan.

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

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

- The evaluation of alternatives should include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the proposed project.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in *State CEQA Guidelines* Section 15126.6(f)(1)) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and, therefore, merit in-depth consideration.[3] Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.[4]

Project Objectives

Pursuant to Section 15126.6(a) of the *State CEQA Guidelines*, the PEIR must consider "alternatives … which would feasibly attain most of the basic objectives of the project but would avoid or substantially

3 CEQA Guidelines §15126.6(f)(3).

4 CEQA Guidelines §15126.6(c).

lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." SCAG has established ten goals and seven guiding principles to serve as project objectives:

Connect SoCal Goals:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of critical habitats

Connect SoCal Guiding Principles:

1. Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets
2. Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system
3. Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities

4. Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices

5. Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions

6. Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs and strategies

7. Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.

Limits of SCAG Authority

While SCAG is required to prepare an SCS as part of the RTP, SCAG lacks the legal authority to require the decision makers of cities and counties to adopt or amend their respective land use policies, such as general plan and zoning code amendments that would implement the land use patterns included in the SCS component of the Plan. Furthermore, SCAG lacks the legal authority to implement land use designations in the SCS component of the Plan or the alternatives. While this PEIR analyses one land use scenario for the proposed Plan and other scenarios in the alternatives analyses below, there are nearly an infinite variety of specific land use scenarios at the local level that could achieve Plan objectives to a similar extent. Pursuant to CEQA, the range of alternatives considered in this PEIR illustrates the different environmental consequences of potential distinct regional-level alternatives to the Plan.

SCAG also does not have any ability or authority to control population and employment levels in the region. The accuracy of growth projections at the regional scale, over both the short and long term, are inherently estimates that are subject to a wide variety of factors outside of the control of SCAG or any of its member counties and cities. Accordingly, all alternatives assume the same forecasted regional growth in population and employment. Estimating the environmental consequences of regional growth within the SCAG region is also subject to a wide variety of uncertainties that are outside of the control of SCAG, and for many topical areas are outside the control of SCAG's member counties and cities.

4.2 ALTERNATIVES TO THE PROPOSED PROJECT

SCAG developed three alternatives for analysis in the PEIR. Each alternative consists of a transportation network element and a land use pattern element and is aligned in part with the scenarios for developing

the Plan (See **Chapter 2.0, Project Description** for further details). The following alternatives are evaluated:

1. No Project Alternative

2. Existing Plans-Local Input Alternative

3. Intensified Land Use Alternative

SCAG did not identify additional alternatives that were rejected. As such, three alternatives were identified for comparative analysis: The No Project Alternative and two other potentially feasible RTP/SCS alternatives, one that increases greenfield development (Existing Plans-Local Input Alternative) and one that places additional emphasis on infill development and transit (Intensified Land Use Alternative).

The No Project alternative, required to be analyzed under CEQA, assumes the projected land use pattern and planned transportation improvements would be consistent with those set forth in the 2016 RTP/SCS and that investments would cease beyond what is currently programmed. The two other alternatives allow for analysis variation in projected land use pattern and planned transportation improvements that could realistically be expected to occur over the Plan horizon. The alternatives reflect different growth patterns and different investment decisions for the transportation system. All three alternatives assume the same regional employment, population, and housing growth projections and roughly the same overall transportation budget. Land use and transportation assumptions vary in the following ways:

Land Use Variables:

- The amount of compact or infill development, which is measured in terms of housing product mix (the mix of high- and low-density housing units) and amount of development occurring in existing developed versus undeveloped areas. Compact development has been shown to be more effectively served by transit, to support potentially higher rates of walking and biking, and to generate less vehicle travel.

- The amount of development in high-quality transit areas, where residents are more likely to use available transit.

- The amount of mixed-use development, which supports shorter vehicle trips and higher rates of non-motorized travel.

Transportation Variables:

- The location, intensity, and type of transit service, based on the extent of transit-supportive land uses in corridors. Higher density, mixed-use corridors provide greater opportunities for higher capacity transit, such as light rail.

- The level of investment in transportation systems management (TSM) strategies, including technology and travel demand management (TDM) programs that allow for greater optimization of existing transportation infrastructure. More compact and mixed-use development patterns can allow some shifts in investment priorities away from road extensions and expansions to improving the function of existing roads for multi-modal travel.

- System pricing strategies, such as cordon pricing as a tool for managing congestion.

Generally, the alternatives represent a progression of land use and transportation investments, such that Existing-Plans Alternative includes the most dispersed land use and fewest transportation investments and Intensified Land Use Alternative represents the most compact land use pattern but maintains the same transportation investments as the Plan. Connect SoCal falls in between the two alternatives. As stated above, all alternatives analyzed accommodate the same amount of regional growth: 3,167,500 new people, 1,391,700 new jobs, and 1,426,700 new housing units.

A more detailed description of each of these alternatives is provided below, followed by a comparative analysis of how well the alternative would achieve the project objectives and the relative level of environmental impact associated with each alternative as compared to implementation of Connect SoCal. For each resource area evaluated in this PEIR the text summarizes whether the impacts of the alternative would generally result in greater or lesser impacts than those Connect SoCal**. Table 4.0-1, Comparison of Connect SoCal and Alternatives,** provides an "at a glance" comparison of the three alternatives and Connect SoCal.

Table 4.0-1
Comparison of Connect SoCal and Alternatives

Elements	Proposed Project: Connect SoCal	Alternative 1: No Project Alternative	Alternative 2: Existing Plans- Local Input Alternative	Alternative 3: Intensified Land Use Alternative
Greenfield Land Consumption	41,546 acres	64,608 acres	54,679 acres	32,247 acres
Natural Land	21,561,361 acres	21,559,568 acres	21,553,029 acres	21,563,157 acres
Agricultural Land (total)	892,477 acres	887,706 acres	882,069 acres	890,603 acres
Total Area Converted from Agriculture to Urban from the existing	6,732 acres	10,101 acres	14,861 acres	8,563 acres
Agriculture Production Value	$3,561,365,881	$3,543,507,241	$3,522,366,445	$3,556,648,245
Acres of Habitat Improved from the existing (Threatened and Endangered Species)	311 acres	29 acres	481 acres	126 acres
Acres of Habitat Improved from the existing (Species Vulnerable to Climate Change – Except Birds)	354 acres	44 acres	735 acres	220 acres
Acres of Habitat Improved from the existing (Species Vulnerable to Climate Change - Birds)	1,525 acres	1,265 acres	3,125 acres	1,216 acres
Acres of Habitat Degraded from the existing (Threatened and Endangered Species)	7,899 acres	8,365 acres	12,274 acres	7,115 acres
Acres of Habitat Degraded from the existing (Species Vulnerable to Climate Change – Except Birds)	9,621 acres	10,456 acres	14,967 acres	8,728 acres
Acres of Habitat Degraded from the existing (Species Vulnerable to Climate Change - Birds)	12,778 acres	15,231 acres	19,862 acres	11,666 acres
High Species Movement Potential	22,210,114 acres	22,211,576 acres	22,191,944 acres	22,211,104 acres
Total Carbon Stock	73,707,960 metric tons	73,726,660 metric tons	73,571,245 metric tons	73,809,796 metric tons

Elements	Proposed Project: Connect SoCal	Alternative 1: No Project Alternative	Alternative 2: Existing Plans- Local Input Alternative	Alternative 3: Intensified Land Use Alternative
Total non-Transportation GHG Emissions (MMT), annual	34.2 MMT	35.0 MMT	34.7 MMT	34.2 MMT
Housing Mix	42% Multifamily 8% Townhome 23% Single Family small lot 27% Single Family large lot	37% Multifamily 7% Townhome 27% Single Family small lot 29% Single Family large lot	40% Multifamily 7% Townhome 25% Single Family small lot 28% Single Family large lot	44% Multifamily 8% Townhome 22% Single Family small lot 26% Single Family large lot
Development Location (Growth Priority Areas)	60% Homes 73% Jobs	58% Homes 70% Jobs	57% Homes 70% Jobs	60% Homes 73% Jobs
Land Pattern Focus (New Housing)	21% Urban (infill) 63% Compact (walkable) 16% Standard (suburban)	9% Urban (infill) 18% Compact (walkable) 73% Standard (suburban)	4% Urban (infill) 69% Compact (walkable) 27% Standard (suburban)	16% Urban (infill) 57% Compact (walkable) 27% Standard (suburban)
Land Pattern Focus (New Jobs)	23% Urban (infill) 62% Compact (walkable) 15% Standard (suburban)	8% Urban (infill) 9% Compact (walkable) 84% Standard (suburban)	4% Urban (infill) 61% Compact (walkable) 36% Standard (suburban)	20% Urban (infill) 52% Compact (walkable) 27% Standard (suburban)
Cumulative Residential and Commercial Building Energy Consumed and Energy Costs	15,464 trillion Btu $670 billion	15,670 trillion Btu $678 billion	15,592 trillion Btu $675 billion	15,381 trillion Btu $666 billion
Cumulative Residential and Commercial Building Water Use and Water Costs	84,676,019 acre-feet $116 billion	85,689,515 acre-feet $117 billion	85,215,252 acre-feet $116 billion	85,038,413 acre-feet $116 billion
Per Household Total Cost (driving + utilities)	$13,225	$13,758	$13,523	$13,172
Infrastructure Capital	$25.9 billion	$28.6 billion	$27.5 billion	$26 billion
Operations and Maintenance	$10.1 billion	$ 11.3 billion	$ 10.6 billion	$ 10.0 billion
Highway Network	80,170 lane mile	74,862 lane mile	80,170 lane mile	80,170 lane mile
Transit Network (route mile)	14,906	14,485	14,824	14,906
Transit Boarding (daily)	5.1 million	3.1 million	4.7 million	5.1 million
Vehicle Miles Traveled (VMT)[1]	517,631,374 (total) 22.89 (VMT per capita)	538,091,045 (total) 23.80 (VMT per capita)	529,269,153 (total) 23.41 (VMT per capita)	516,259,271 (total) 22.83 (VMT per capita)
Vehicle Hours Traveled (VHT)[1]	14,130,874	15,424,699	14,539,787	14,074,675

Elements	Proposed Project: Connect SoCal	Alternative 1: No Project Alternative	Alternative 2: Existing Plans- Local Input Alternative	Alternative 3: Intensified Land Use Alternative
Vehicle Hours Delay[1]	2,668,229 (total) 0.12 (Delay per capita)	3,470,645 (total) 0.15 (Delay per capita)	2,823,797 (total) 0.12 (Delay per capita)	2,619,980 (total) 0.12 (Delay per capita)

Note:
1 This includes light and medium-duty vehicles, and heavy-duty trucks.
Source:
SCAG Modeling and SPM data, 2019.

A summary comparison of major impact categories of the Plan and alternatives is included in **Table 4.0-2, Comparison of Alternatives to Connect SoCal.**

Table 4.0-2
Comparison of Alternatives to Connect SoCal

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Aesthetics				
Scenic Vistas	Significant	Less (significant)	Greater (significant)	Greater (significant)
Scenic Resources	Significant	Less (significant)	Greater (significant)	Greater (significant)
Visual Character	Significant	Greater (significant)	Greater (significant)	Less (significant)
Light and Glare	Significant	Greater (significant)	Greater (Significant)	Less (significant)
Agricultural Resources				
Convert Prime Farmland	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Conflict with Williamson Act	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Conflict with forest land zoning	Significant	Less (Less than significant)	Similar (Significant	Similar (Significant)
Loss of forest land	Significant	Less (less than significant)	Similar (Significant)	Similar (Significant)
Other changes that result in loss of farmland or forest land	Significant	Greater (significant)	Greater(significant)	Similar (significant)
Air Quality				
Conflict with Air Quality Plans	Less than significant	Similar (less than significant)	Similar (less than significant)	Less (Less than significant)
Violate an air quality standard	Significant	Similar (significant)	Greater (significant)	Similar (significant)
Cumulatively considerable net increase in criteria pollutants	Significant	Greater (significant)	Greater (significant)	Less (significant)
Expose sensitive receptors	Significant	Similar (significant)	Similar (significant)	Similar (significant)

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Odor	Less than significant	Greater (less than significant)	Similar (less than significant)	Similar (less than significant)
Biological Resources				
Sensitive Species	Significant	Greater (significant)	Greater (significant)	Less (significant)
Riparian Habitat	Significant	Greater (significant)	Greater (significant)	Less (significant)
Wetlands	Significant	Greater (significant)	Greater (significant)	Less (significant)
Migratory Fish/Birds	Significant	Greater (significant)	Greater (significant)	Less (significant)
Tree Preservation	Significant	Greater (significant)	Greater (significant)	Less (significant)
Local Plans/HCPs	Significant	Greater (significant)	Greater (significant)	Less (significant)
Cultural Resources				
Historical Resources	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Archeological Resources	Significant	Greater (significant)	Greater (significant)	Less (significant)
Disturb Human Remains	Significant	Similar (significant)	Greater (significant)	Less(significant)
Energy				
Wasteful and inefficient use of energy	Less than significant	Greater (less than significant)	Greater (less than significant)	Less (less than significant)
Conflict with or obstruct renewable energy plans	Less than significant	Similar (less than significant)	Similar (less than significant)	Less (less than significant)
Geology and Soils				
Fault rupture, ground shaking, ground failure/ liquefaction, landslides	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Soil Erosion	Significant	Greater (significant)	Greater (significant)	Less (significant)
Unstable Soil	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Expansive Soil	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Septic Systems	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Paleontological Resources	Significant	Greater (significant)	Greater (significant)	Less (significant)
Greenhouse Gas Emissions				
Generate greenhouse gas emission	Significant	Greater (significant)	Greater (significant)	Less (significant)
Conflict with Plans	Significant	Greater (significant)	Greater (significant)	Similar (significant)
Hazards and Hazardous Materials				
Routine Transport	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Upset conditions	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Emissions within 0.25 mile of school	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Hazardous materials site	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Airport hazards	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Emergency response plan	Significant	Greater (significant)	Greater (significant)	Less (significant)
Hydrology and Water Quality				
Violate water quality standard	Significant	Greater (significant)	Greater (significant)	Less (significant)

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Decrease groundwater	Significant	Greater (significant)	Greater (significant)	Less (significant)
Erosion or siltation	Significant	Greater (significant)	Greater (significant)	Less (significant)
Flooding	Significant	Greater (significant)	Greater (significant)	Less (significant)
Stormwater runoff	Significant	Greater (significant)	Greater (significant)	Less (significant)
Flood, seiche, tsunami	Significant	Greater (significant)	Greater (significant)	Less (significant)
Conflict with water quality control plan	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Land Use				
Physically divide a community	Significant	Less (significant)	Similar (significant)	Similar (significant)
Conflict with land use plans	Significant	Less (significant)	Similar (significant)	Greater (significant)
Mineral Resources				
Loss in availability of mineral resources	Significant	Less (significant)	Greater (significant)	Less (significant)
Loss of locally important mineral resources	Significant	Less (significant)	Greater (significant)	Less (significant)
Noise				
Temporary or permanent increase in noise levels in excess of established standards	Significant	Similar (significant)	Similar (significant)	Less (significant)
Groundborne vibration or noise	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Airport noise	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Population and Housing				
Induce unplanned population growth	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Displace people or housing	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Public Services				
Fire	Significant	Greater (significant)	Greater (significant)	Less (significant)
Police	Significant	Greater (significant)	Greater (significant)	Less (significant)
Schools	Significant	Similar (significant)	Similar (significant)	Less (significant)
Library	Significant	Similar (significant)	Similar (significant)	Less (significant)
Recreation				
Increase park use	Significant	Less (significant)	Less (significant)	Greater (significant)
Construction of new parks	Significant	Similar (significant)	Similar (significant)	Greater (significant)
Transportation and Traffic				
Conflict with program, plan, ordinance or policy addressing circulation system	Less than significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Conflict with *CEQA Guidelines* 15064.3(b)	Significant	Greater (significant)	Greater (significant)	Less (significant)
Increase hazards	Less than significant	Greater (less than significant)	Greater (less than significant)	Greater (less than significant)

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Inadequate emergency access	Significant	Greater (significant)	Greater (significant)	Less (significant)
Tribal Cultural Resources				
Adverse change in a TCR	Significant	Greater (significant)	Greater (significant)	Less (significant)
Utilities – Solid Waste				
Generate excess solid waste or conflict with statutes	Significant	Greater (significant)	Similar (significant)	Similar (significant)
Utilities – Wastewater				
New or expanded wastewater treatment	Significant	Greater (significant)	Greater (significant)	Less (significant)
Exceed capacity	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Utilities – Water Supply				
New or expanded water facilities	Significant	Greater (significant)	Greater(significant)	Less (significant)
Sufficient water supply	Significant	Greater (significant)	Greater (significant)	Less (significant)
Wildfire				
Impair adopted response plan	Significant	Greater (significant)	Greater (significant)	Less (significant)
Slope, prevailing winds may exacerbate wildfire risk	Significant	Greater (significant)	Greater (significant)	Less (significant)
Installation or maintenance of infrastructure that may exacerbate fire risk	Significant	Greater (significant)	Greater (significant)	Less (significant)

Source: Impact Sciences 2019

Alternative 1: No Project Alternative

The No Project Alternative is required by Section 15126.6I(2) of the *CEQA Guidelines* and assumes that the Plan would not be implemented. The No Project Alternative allows decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative evaluates "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (*CEQA Guidelines* Section 15126.6€(2)). The No Project Alternative is aligned with the Trend/Baseline Scenario[5] and includes transportation projects that are in place at the time of

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preparation of the Connect SoCal Plan and that are included in the first two years of the previously conforming transportation plan and/or federal transportation improvement program (FTIP). "Exempt projects" include safety projects and certain mass transit projects, transportation control measures ("TCMs") that are approved by the State Implementation Plan, and project phases that were authorized by the FHWA/FTA prior to expiration of SCAG's conformity finding for the adopted 2016 RTP/SCS. These exempt projects would also be included in the No Project Alternative since they could move forward in the absence of an adopted Connect SoCal Plan.[6]

The land use strategies included in the No Project Alternative are based on the trending socioeconomic growth projection to the future (2045) updated with the same jurisdictional local input population, household and employment data as those in the Connect SoCal Plan to reflect the most recent local input growth estimates in the region.

Alternative 2: Existing Plan–s - Local Input Alternative

The Existing Plans - Local Input Alternative is aligned with the Existing Plans – Local Input Scenario in the Plan.[7] This alternative incorporates local general plans and land use information to reflect the Plan's population, household and employment growth estimates in the region. The Plan's transportation and land use strategies are not included in this alternative. The transportation network analyzed under this alternative are the transportation projects planned by each County Transportation Commission (CTC) in the region. In general, this alternative represents a more dispersed land use pattern as compared to Connect SoCal.

Alternative 3: Intensified Land Use Alternative

This Intensified Land Use Alternative is based off the Plan's transportation network and strategies. This alternative analyzes more aggressive densities and land use patterns than included in the Accelerated Tomorrow Scenario.[8] The land use pattern builds on the land use strategies as described in the Connect SoCal Plan and beyond. Specifically, it increases densities and intensifies land use patterns of the Plan, especially around HQTAs in an effort to maximize transit opportunities. The growth pattern associated with this alternative optimizes urban areas and suburban town centers, transit-oriented developments (TODs), HQTAs, livable corridors, and neighborhood mobility areas. It also includes a greater

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6 Federal Highway Administration. *Transportation Conformity: A Basic Guide for State and Local Officials (Revised 2010), FHWA-HEP-11-001*. Available at: http://www.fhwa.dot.gov/environment/air_quality/conformity/guide/guide10.cfm

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progressive job-housing distribution optimized for TODs and infill in HQTAs. It includes the same transportation investments as the Plan. This alternative considers the basis of the Plan with enhancements to accelerate the SB 375 GHG emissions reduction trend into 2045 and beyond, and includes related improvements for air quality, livability, public health, active transportation opportunities, and affordability.

4.3 COMPARATIVE ANALYSIS OF IMPACTS

Consistent with the requirements of Section 15126.6(d) of the *State CEQA Guidelines*, this section of the analysis provides information for the alternatives, including the No Project Alternative, to allow meaningful evaluation, analysis, and comparison with the Project, inclusive of direct, indirect, and cumulative impacts (**Table 4.0-2, Comparison of Alternatives to Connect SoCal).** The evaluation demonstrates if the alternative can avoid or reduce the significant and unavoidable effects of the Project.

Alternative 1: No Project Alternative

Aesthetics

Impacts to scenic vistas from transportation projects in the No Project would be less than Connect SoCal because the No Project Alternative would result in fewer transportation projects overall and therefore fewer opportunities to obstruct a scenic vista. Impacts from the land use pattern could be greater than Connect SoCal as the overall land use pattern would be more dispersed resulting in more opportunities to obstruct a scenic vista, however, projects would also generally be of a lower scale than with Connect SoCal. However, with fewer projects, impacts would likely be less than the Plan but still significant.

The No Project Alternative would also result in fewer opportunities to create visually contrasting elements due to the reduced number of transportation and land use projects as well as the lower scale of projects overall. The No Project Alternative would not include any transportation projects that could affect any State Scenic Highways or vista points. However, views of green space from these areas could be impacted by land use development. Impacts would still be significant but less than the Plan.

Connect SoCal includes strategies to focus growth in HQTAs, which would help reduce the consumption and disturbance of natural lands and reduce resultant impacts on aesthetics and views. Under the No Project Alternative, these land use patterns may not occur and therefore greater areas of greenfield would be impacted resulting in greater impacts to visual character (although individual jurisdictions may still seek to reduce the urban footprint through their general plans). The No Project Alternative's impacts would result in the consumption of more greenfield land (91 square miles, as opposed to 51 square miles under the Plan) potentially resulting in loss of scenic resources and changes in visual character. Impacts

to visual character in urbanized areas would be similar to Connect SoCal because existing zoning and other regulations governing visual quality are mandatory and would be equally enforced under this alternative. Regarding light and glare, the greater amount of land consumed under this alternative, could introduce more lighting into undeveloped areas resulting in potential impacts greater than the Plan.

Agriculture and Forestry Resources

Conversion of agricultural land (including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance), forest land, timberland, and timberland zoned Timberland Production to non-agricultural, non-forest, or non-timber uses under this alternative would be greater than under Connect SoCal because the projected land use pattern of the No Project Alternative would be less compact and would convert 3,369 more acres of agricultural land to urban use. However, the planned transportation improvements of this alternative would include 5,308 fewer lane miles of new or expanded roadway and highways relative to Connect SoCal. The additional land disturbance associated with the less compact land use pattern would occur in areas with agricultural land.

Because the No Project Alternative would not include projects with the potential to impact forest lands, impacts under this alternative would be reduced compared to the Plan. Impacts related to forest land under the No Project would be less than significant.

The potential for conflicts with zoning, land use designations, Williamson Act contracts, and/or other applicable regulations that protect agricultural and forestry resources and timberlands would also be greater because additional agricultural lands would be converted to non agricultural uses. Similarly, the potential for other changes that could result in the conversion of agricultural land to developed land uses would be greater due to increases in urbanization in rural areas under this alternative as compared to Connect SoCal.

Air Quality

Under the No Project Alternative, no new transportation investments would be made, beyond those that are currently programmed. As a result, fewer transportation projects would be built than under the Plan resulting in less construction emissions compared to the Plan. However, construction emissions in the region as a whole would still exceed the significance thresholds established in the *CEQA Guidelines* (these thresholds were developed for use in analyzing individual development projects) and applied by the local air districts (SCAQMD, VCAPCD, MDAQMD, and AVPCD). Similar to the Plan, the cumulative construction emissions in the region would result in a significant impact, which would be short-term for each individual project but overall the region would experience on-going air quality impacts.

Projected long-term emissions are cumulatively significant if they are not consistent with the local air quality management plans and state implementation plans. Unlike the Plan, the No Project Alternative may not conform to the local air quality management plans. The No Project Alternative is anticipated to have higher levels of VMT than the Plan (**Table 4.0-3, Plan Compared to Alternative 1: Summary of Maximum Exposed Individuals Residential 30-Year Exposure Cancer Risk)** resulting in a higher level of particulate matter and ozone precursors, pollutants for which the area is designated as non-attainment. As a result, the No Project Alternative could have a significant cumulative impact.

With respect to cancer risk and impact to public health, the No Project Alternative would result in more emissions as compared to the Plan due to the increase in VMT (**Table 4.0-3**). Due to differences in VMT (light and medium duty vehicles and heavy-duty truck traffic) in some cases, for some segments the No Project Alternative would have slightly less risk than under the Plan. As for the Plan, future emissions would be substantially less than existing conditions.

Table 4.0-3
Plan Compared to No Project Alternative: Summary of Maximum Exposed Individuals Residential 30-Year Exposure Cancer Risk

Segment No.	Transportation Segment	County/Region	No Project Alternative (risk in a million)	Connect SoCal Plan (risk in a million)
1	IMP I-8	Imperial/El Centro	14.2	14.5
2	IMP SR-78	Imperial/Westmoreland	37.1	18.9
3	LA I-110	Los Angeles/Carson	24.8	23.5
4	LA I-710	Los Angeles/Compton	29.9	30.9
5	LA SR-60 DB	Los Angeles/Diamond Bar	31.1	29.7
6	LA SR-60 SEM	Los Angeles/ South El Monte	18.4	16.3
7	ORA I-5	Orange/ Orange	5.36	5.49
8	ORA I-405	Orange/ Seal Beach	12.2	11.8
9	RIV I-10	Riverside/ Banning	4.97	4.83
10	RIV SR-15	Riverside/ Temecula	9.65	9.52
11	RIV SR-91	Riverside/ Corona	8.4	8.41
12	SB I-15 ONT	San Bernardino/Ontario	10.4	10.5
13	SB I-15 VIC	San Bernardino/ Victorville	40.6	41.3
14	SB SR-60	San Bernardino/ Ontario	19.1	18.8
15	VEN US-101 SB	Ventura/ San Buenaventura	4.93	4.85
16	VEN US-101 TO	Ventura/ Thousand Oaks	19.6	21.9

Source: Impact Sciences, 2019.
Note: Segments 7, 11, 12. 13, and 16 under No Project Alternative will have a higher health risk than under the Plan.

Health risk associated with construction activities would be similar to the Plan and potentially significant adjacent to extended intense construction activities.

Objectionable odors are expected to be similar to the Plan, there would be fewer construction projects causing these odors but also higher VMT, causing more diesel emission odors.

Overall impacts to air quality would be greater when compared to Connect SoCal due to the more dispersed growth pattern and greater VMT.

Biological Resources

The No Project Alternative would result in greater impacts to biological resources when compared with the implementation of the Plan. Under this alternative there would be 57 percent more standard (single family) suburban residential development and an additional 1,793 acres of natural lands developed. As such, more sensitive biological resources would be expected to be affected under the No Project Alternative. The No Project Alternative would not include transportation and land use strategies that focus growth along existing corridors and in urbanized areas, nor would it encourage additional greenways. As a result, development would be more scattered through the region when compared to the Plan, and native habitat conversion and fragmentation would increase.

The Plan includes transportation and land use strategies that focus growth along existing corridors and in urbanized areas, rather than allowing development of vacant, open space/recreation, and agricultural lands. This compact development pattern would focus population in urban areas. Without the Plan land use strategies, impacts to biological resources would be more widespread throughout the region. Additionally, habitat degradation would be higher under the No Project Alternative (8,365 acres) than under the Plan (7,899 acres). Impacts to biological resources are directly linked to the amount of native habitat conversion in non-urban areas. As such, impacts would be greater under the No Project Alternative.

Cultural Resources

Impacts to cultural resources (historic built environments, archeological, and human remains, and important examples of major periods of California history or prehistory) under this alterative would be greater than under Connect SoCal because this alternative's projected land use pattern would be less compact and include an additional 23,062 of greenfield development. The additional land disturbance, such as grading and excavation, resulting from the projected land use pattern of this alternative would result in greater likelihood of encountering unknown surface or subsurface archaeological resources, or human remains; it would also result in greater impacts to the character of settings that contribute to the

significance of historic built environments. However, this alternative would result in fewer lane miles constructed which would reduce transportation related impacts compared to Connect SoCal (as discussed below). Overall, impacts to cultural resources would be greater when compared to Connect SoCal.

Energy

The No Project Alternative would likely result in increased use of energy because the No Project Alternative assumes more large lot development, resulting in a larger share of individual detached structures. These individual structures require more energy for materials, more materials overall, and more fuel to build (e.g., additional equipment and vehicle use for site development, grading, and excavation) than would be needed for attached structures.

Per-capita energy consumption under this alternative would be greater than under Connect SoCal due to the less compact land use pattern. The No Project Alternative also includes a housing mix with a greater proportion of large-lot single-family homes (73 percent standard suburban) as compared to the Plan (16 percent standard suburban). Because the No Project Alternative would include more large-lot single-family homes, which require more energy use per capita as compared to attached and multi-family homes, this alternative would result in more energy use per capita as compared to the Plan. The less compact land use pattern also leads to higher VMT, and more inefficient consumption of transportation energy than under the Plan. While it would be likely that, compared to baseline conditions (2019), per capita energy consumption would go down under this alternative (as the trajectory of per capita energy is on a downward trend overall), per capita energy consumption would be higher than under the Plan. Therefore, although impacts would be less than significant, the No Project Alternative would result in greater impacts related to the wasteful, inefficient, or unnecessary consumption of energy during construction activities and long-term operations.

This alternative is likely to have similar impacts on state and local plans for renewable energy or energy efficiency as compared to the Plan. Use of some renewable energy sources could be facilitated, while the use of other renewable energy sources could be hindered by this alternative. Implementation of the California Energy Code and State goals for increasing the percentage of electricity from renewable and zero-carbon sources under this alternative would be the same as under the Plan.

Geology and Soils

While implementation of the Connect SoCal Plan would result in a greater number of transportation projects than the No Project Alternative, the No Project Alternative would result in similar impacts associated with risk as a result of surface fault rupture, ground-shaking liquefaction, landslides, and

other risks associated with seismic events. The anticipated population growth would remain constant over all alternatives and the Project, and the entire region is subject to the same seismic risk. Existing state and local building code requirements addressing substantial adverse effects due to earthquakes and seismic activity would apply to the projected land use pattern and planned transportation improvements of the Plan.

Impacts related to soil erosion would be significant and would be greater under this alternative as there would be an increase in land consumed which could result in more soils exposed. Impacts related to unstable soil, expansive soil, and septic systems would also be less than significant and similar to the Plan as projects would continue to comply with existing regulations.

Impacts to unique geologic features would be greater under this alternative than under the Plan because the projected land use pattern of this alternative is less compact. The additional land disturbance resulting from the projected land use pattern under this alternative would result in greater impacts to unique geologic features.

Greenhouse Gas Emissions

The greenhouse gas (GHG) emissions for building energy would be higher under the No Project Alternative (32.4 MMTCO_2e/year) than under the Plan (31.3 MMTCO_2e/year), a difference of 3 percent (**Table 3.8-9, Greenhouse Gas Emissions for the SCAG Region from Three Primary Sources [CO2e]**). The water-energy GHG emissions under the No Project Alternative (2.6 MMTCO2e/year) would be higher than under the Plan (2.5 MMT CO_2e/year) (see **Table 3.8-9**). For transportation, the GHG emissions with the No Project Alternative (74.6 MMT CO_2e/year) would also be greater compared to the Plan (64 MMT CO_2e/year) (see **Table 3.8-9**). The more disbursed development pattern of the No Project Alternative would result in increased building energy use (as multi-family buildings are more efficient than single-family homes) and more VMT. The Plan would improve regional GHG emissions compared to the No Project Alternative.

Senate Bill (SB) 375 requires CARB to develop regional CO_2 emission reduction targets, compared to 2005 emissions, for cars and light trucks only for 2020 and 2035 for each of the state's MPOs. Unlike the Plan, the No Project Alternative would not achieve SB 375 targets due to the inability to complete the transportation investments and increase density of development in HQTAs that are required to achieve the GHG emission reductions made possible by the Plan. Since the GHG emissions from transportation sources would be higher with the No Project Alternative than under the Plan, this alternative would not meet the regional GHG reduction targets for cars and light-duty trucks, would not be sufficient to meet

the state's overall GHG reduction goals, and would conflict with AB 32 and SB 32 even more than the Plan. As such, the No Project Alternative would have a greater impact on GHG emissions than the Plan.

Hazards and Hazardous Materials

Hazardous materials impacts to the public or the environment associated with construction activities and operation under this alternative would be the same as the impacts under the Plan. This is because of the numerous federal, state, and local requirements and regulations that minimize the creation of significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials; through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and through handling of hazardous materials, substances, and waste within 0.25 mile of an existing or proposed school. These existing requirements and regulations would apply equally to the different projected land use patterns and planned transportation network improvements of this alternative and the proposed Plan, so impacts would be the same. The same is true for existing requirements and regulations addressing potential safety hazards and excessive noise within an airport land use plan or within two miles of a public or public use airport, so airport-related safety and noise impacts to people residing or working in the plan area would be the same under this alternative.

The more dispersed land use pattern under this alternative would be more automobile-oriented than the Plan and could complicate emergency evacuation plans that rely in part on public transit. Therefore, the less compact land use pattern of this alternative would result in greater impacts associated with impairing the implementation of adopted emergency response and emergency evacuation plans.

Hydrology and Water Quality

Under the No Project Alternative, fewer areas would be impacted by excavation and construction activities related to transportation projects as compared to the Plan. While the No Project Alternative would reduce the number of transportation projects built in the SCAG region, it would result in greater vacant land consumption that would, in turn, increase impervious surface. The additional land area permanently converted to impervious surfaces would increase the potential volume and decrease the water quality of stormwater flows. Additional impervious surface also would interfere with groundwater recharge and alter drainage patterns in a manner that would increase the potential for substantial erosion, siltation, and flooding relative to the Plan. This alternative would require greater storm drainage system capacity than the Plan because of its conversion of additional land area to impervious surface area. In addition, the housing mix of this alternative would include a larger share of large-lot single-family homes, which would result in more managed landscaping areas and associated pollutants such as

nutrients, herbicides, and irrigated runoff, which in turn could adversely affect surface and groundwater quality.

With fewer transportation projects than the Plan, impacts of the No Project Alternative would be reduced when compared with the Plan. As the currently planned projects included in the No Project alternative are built, the impacts resulting from increased roadway runoff and drainage patterns would remain significant. Likewise, the impacts to groundwater infiltration caused by the increased impervious surfaces of roadway projects, and to increased flooding hazards, would remain significant.

Similar to the Plan, this alternative could conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan, impacts would be similar to the Plan.

Land Use Planning

Under the No Project Alternative, no new transportation investments would be made, beyond those that are currently programmed. As a result, fewer transportation projects would be built than under the Plan and new growth would occur consistent with local general plans, although it would be more dispersed than contemplated under the Plan. The less compact land use pattern of this alternative provides less connectivity within existing communities because of its more dispersed allocation of future growth, but it would not physically divide any existing communities. This impact would be the same as under the Plan. The transportation projects in this alternative would add 5,308 fewer lane miles compared to the Plan. With fewer lane miles, the planned transportation improvements of this alternative would result in less impact from physically dividing existing communities. Impacts would be less than the Plan, however would remain significant.

The No Project Alternative would result in fewer impacts with regard to conflicts with any applicable land use plan, policy, or regulation for the purpose of avoiding or mitigating an environmental effect due to there being fewer transportation projects. The Plan's land use strategies would be implemented to the extent they have already been built into existing local jurisdiction's plans and therefore there would be less opportunity for land use policy conflicts as compared to the Plan.

Mineral Resources

The No Project Alternative would result in fewer lane miles compared to the Plan which would require less aggregate. Further, the No Project Alternative could result in greater loss of availability of known mineral resources that would be of value to the region and the residents of the state, as well as locally important mineral resources, due to the greater amount of land that would be converted to urban land

potentially covering more mineral resource extraction opportunities. However, overall impacts would be less than the Plan but still significant.

Noise

The No Project Alternative would result in reduced impacts from noise when compared with Connect SoCal. Under the No Project Alternative, no new transportation investments would be made, beyond those that are currently programmed; and land use development would be more distributed than under the Plan. Therefore, the No Project Alternative would not include transportation and land use strategies that focus growth along existing corridors and in urbanized areas, would not result in construction or operation of new transportation infrastructure, and would not develop new HQTAs. As a result, fewer transportation projects would be built than under the Plan, however a greater area would be affected by construction noise associated with land use development.

Construction noise in urban areas is generally expected and considered less than significant. Construction noise on individual sites could still exceed significance thresholds in some jurisdictions. Construction-related noise impacts would be similar, although possibly fewer sensitive receptors would be impacted under this alternative due less urban locations that would be subject to disturbance during construction activities. This would increase the number of separate construction sites, which would increase overall noise levels associated with construction activities. However, impacts overall would be similar as the Plan and still significant.

The projected land use pattern of this alternative, while less compact than the Plan, would not result in land use types that would result in meaningfully different levels of vibration or groundborne noise. The planned transportation improvements of this alternative would include limited roadway and highway improvements which also would not result in meaningfully different levels of vibration or groundborne noise relative to the planned transportation improvements identified in the Plan. This impact is the same under this alternative.

Regarding aviation noise, the No Project Alternative would result in similar impacts to the Plan, as there would be no change in air traffic patterns or airport operations under this alternative.

Population and Housing

Impacts related to population and housing should be similar under all alternatives, because the same number of people, housing units and jobs are assumed. The less compact land use pattern of this alternative could still result in displacement of substantial numbers of people or existing housing that

necessitates the construction of replacement housing elsewhere. This impact is the same as the Plan and would remain significant.

Public Services

This alternative is anticipated to result in public service impacts similar to those that would be generated under the Plan, because the same total population, housing, and employment are assumed, and public service impacts are generally population driven. However, this alternative could worsen the ability to achieve local levels of service due to a more dispersed land use pattern that makes it more difficult to efficiently serve the population. This impact is greater than the Plan. The planned transportation improvements of this alternative would have the same public services impacts as the Plan, although congestion (VHD) would increase compared to the Plan which could affect police and fire services in some areas.

Regarding schools and libraries, the population would be the same under each of the alternatives. While there could be less demand in urban areas (due to the more dispersed land use pattern) there could be greater impacts in less developed areas. Given the increased growth in suburban areas, this alternative could contribute to substantial adverse physical impacts associated with the construction and subsequent operation of new or physically altered school and library facilities in order to maintain acceptable service ratios. Impacts would be significant and similar to the Plan.

Parks and Recreation

This alternative could worsen the ability to achieve local levels of service due to a more dispersed land use pattern that makes it more difficult to efficiently serve the population. This impact is greater than the Plan. Although there would be less demand on urban parks (which are often overburdened) there could be more demand on large regional parks due to a more dispersed land use pattern and the need to travel to parks. As the regional is well-served with regional parks, this impact would be less than the Plan but still significant.

Transportation, Traffic, and Safety

The No Project Alternative would result in greater VMT per capita (23.80 VMT/per capita) than under the Plan (22.89 VMT/per capita), in part because of the less compact land use pattern. This alternative would also locate fewer homes and jobs near HQTAs. According to CARB much greater VMT reductions (beyond those achieved by the Plan) will be required to meet the state's long-term climate goals. Therefore, the VMT impact of this alternative is greater than under the Plan. For the reasons provided above, this alternative would also result in lower levels of transit ridership (by two million boardings) as

well as walking, and biking for commute trips and all trips and it would be less complementary to existing and planned bicycle and pedestrian facilities.

The No Project Alternative would also result in higher VHD by 802,416 (total). The compact development pattern included in the Plan would concentrate population in urban areas and encourage alternative modes of travel other than automobiles. Without the Plan development patterns, vehicle miles traveled, vehicle hours of delay, worker commute trips, and accident rates would be higher than under the Plan resulting in greater impacts.

Under the No Project Alternative, impacts related to design hazards would also be greater (although still less than significant) as fewer transportation improvements would be constructed and the Plan's focus on safety would not be implemented. Emergency access would be greater because the land use pattern of large lot homes would be less efficient and there would be fewer transportation improvements constructed.

Tribal Cultural Resources

The No Project Alternative would result in greater impacts to tribal cultural resources when compared with the Plan. Under the No Project Alternative, there would be an additional 23,062 acres of greenfield land consumed, which would have the potential to impact previously undiscovered tribal cultural resources, such as archaeological resources, sacred sites, or human remains. However, the transportation network in this alternative would include fewer lane miles and could reduce the potential to impact previously undiscovered tribal cultural resources as compared to the Plan. Due to the less compact land use pattern and the increase in greenfield consumed, impacts would be greater under the No Project Alternative and would be significant.

Utilities and Service Systems

This alternative is anticipated to result in impacts to utilities and service systems similar to those that would be generated under the proposed Plan and would be significant because the same total population, housing, and employment numbers are assumed, and utilities impacts are generally population driven. The larger share of single-family homes under this alternative would likely increase the demand for surface and groundwater supplies because such housing units have higher demand for water, for example through increased irrigation demand for landscaping areas and additional appliances and fixtures that use potable water (e.g., sinks, toilets, showers). As a result, this alternative could exceed the capacity of existing water storage, conveyance, distribution, and treatment facilities to a greater degree than the Plan and result in construction of new, expanded, or relocated facilities. These impacts of this alternative are greater than under the Plan and would be significant.

In addition, this alternative could adversely affect the capacity of the necessary utility conveyance and distribution systems (e.g. wastewater, storm drain,) due to a more dispersed land use pattern that makes it more difficult to efficiently serve the population. All of the alternatives would be required to follow the same federal, state, and local statutes and regulations related to solid waste. This alternative would have the same impact related to solid waste generation and conflicts with solid waste management and reduction statutes and regulations.

Wildfire

Under the No Project Alternative, impacts would increase with regards to increased development along the wildland interface that may exacerbate fire risks. The No Project Alternative would result in an additional 43,692 housing units at risk for wildfire as compared to the Plan, resulting in greater potential wildfire risk. Areas with dry vegetation have the potential to exacerbate wildfire risk due to future development activities that could generate flammable debris piles. This is particularly true in the currently rural and underdeveloped parts of the SCAG region. Future roadway and development construction in such areas has the potential to result in significant impacts as a result of construction equipment generating sparks or oil spill and other combustible materials leading to the start and spread of wildfires. This impact would be greater under the No Project Alternative and would be significant.

Alternative 2: Existing Plans - Local Input Alternative

Aesthetics

Impacts to scenic vistas from the land use pattern under this alternative would be less than the Plan, because this alternative assumes lower density development. Structures are likely to be shorter and more dispersed, with less likelihood of blocking or impeding scenic vistas. However, with more development in non-urbanized areas, there could be greater potential for conflicts with scenic vistas which would be a greater impact than the Plan. The transportation network would result in the same number of lane miles as the Plan and therefore potential transportation related impacts would be similar. With a land use pattern that is more dispersed - combined with the same number of capacity-enhancing planned transportation improvements as the Plan, this alternative would have greater impacts to scenic resources along official or eligible state scenic highways.

Conversion of greenfield to development would be more dispersed, as the Existing Plans-Local Input Alternative would consume 54,679 acres compared to the Plan's consumption of 41,546 acres. Because population growth would be less concentrated in existing open areas than the Plan, there would be greater overall impacts to visual character and quality. In urban areas, with regard to conflicts with applicable zoning or regulations regarding scenic quality, there would be similar effects under this

alternative as the Plan since there would be a similar number or transportation projects. The potential for substantial degradation of visual character or quality of public views of sites and their surroundings in non-urbanized areas would be greater under this alternative as compared to the Plan because this alternative would locate more housing within non-urbanized areas. With a more dispersed land use pattern combined with capacity-enhancing planned transportation improvements in non-urbanized areas, this alternative would result in greater impacts to visual quality compared to the Plan and impacts would be significant.

Agriculture and Forestry Resources

Conversion of agricultural land (including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance), forest land, timberland, and timberland zoned Timberland Production to non-agricultural, non-forest, or non-timber uses under this alternative would be greater than under the Plan because the projected land use pattern of the Existing Plans-Local Input Alternative would be less compact and would result in the direct loss of an additional 8,129 acres of agricultural land converted to urban use compared to the Plan. The potential for conflicts with zoning, land use designations, Williamson Act contracts, and/or other applicable regulations that protect agricultural resources would also be greater for the same reasons and because the same projects are included in the transportation network that have the potential to conflict with or convert forest lands. Similarly, the potential for other changes that could result in the conversion of agricultural land to developed land uses would be greater due to the overall increase in greenfield consumption under this alternative as compared to the Plan.

Air Quality

The Existing Plans-Local Input Alternative would have the same population, housing, and employment as the Plan, but would result in an incrementally less dense land use pattern. Similar to the No Project Alternative, construction emissions would still likely exceed the significance thresholds established in the *CEQA Guideline*s and result in a significant short-term impact. However, in the long term, the Existing Plans-Local Input Alternative would likely have a similar less than significant impact to the AQMPs since development under this alternative would focus the majority of new housing on compact (walkable) locations (although less than under the Plan) and result in a lower VMT than under No Project Alternative. However, the Existing Plan-Local Input Alternative would not implement the same land use strategies as Connect SoCal, therefore the alternative would have higher VMT than the Plan. Thus, while this alternative would reduce particulate matter and ozone precursor emissions compared to the No Project Alternative, emissions would not be reduced to the same level as under the Plan.

As with the Plan, under the Existing Plans-Local Input Alternative, reductions in cancer risk levels associated with diesel particulate matter occur as a result of on-going emission controls. The cancer risk and impact to public health for this alternative would be similar compared to the Plan since the transportation network is the same as the Plan (**Table 4.0-4 Connect SoCal Compared to Alternative Existing Plans-Local Input Alternative: Summary of Maximum Exposed Individuals Residential 30-Year Exposure Cancer Risk**). There are incremental differences in risk among segments due to differing traffic volumes, however, as for the Plan risk would be reduced substantially as compared to existing conditions.

Table 4.0-4
Connect SoCal Compared to Existing Plans-Local Input Alternative: Summary of Maximum Exposed Individuals Residential 30-Year Exposure Cancer Risk

Segment No.	Transportation Segment	County/Region	Existing Plans-Local Input Alternative (risk in a million)	Connect SoCal (risk in a million)
1	IMP I-8	Imperial/El Centro	14.6	14.5
2	IMP SR-78	Imperial/Westmoreland	20.8	18.9
3	LA I-110	Los Angeles/Carson	24	23.7
4	LA I-710	Los Angeles/Compton	31.1	30.9
5	LA SR-60 DB	Los Angeles/Diamond Bar	29.1	29.7
6	LA SR-60 SEM	Los Angeles/ South El Monte	16.4	16.3
7	ORA I-5	Orange/ Orange	5.51	5.49
8	ORA I-405	Orange/ Seal Beach	11.9	11.8
9	RIV I-10	Riverside/ Banning	4.99	4.83
10	RIV SR-15	Riverside/ Temecula	9.57	9.52
11	RIV SR-91	Riverside/ Corona	8.49	8.41
12	SB I-15 ONT	San Bernardino/Ontario	11.1	10.5
13	SB I-15 VIC	San Bernardino/ Victorville	40.7	41.3
14	SB SR-60	San Bernardino/ Ontario	18.5	18.8
15	VEN US-101 SB	Ventura/ San Buenaventura	4.82	4.85
16	VEN US-101 TO	Ventura/ Thousand Oaks	22	21.9

Source: Impact Sciences, 2019.
Note: Segments 5, 12, 12. 14, and 15 under Existing Plans-Local Input Alternative will have a higher health risk than under the Plan.

Health risk associated with construction activities would be similar to the Plan and potentially significant adjacent to extended intense construction activities.

Objectionable odors are expected to be similar, although more dispersed since the same amount of construction will occur but over a more distributed area. Overall impacts to air quality could be incrementally greater when compared to Connect SoCal due to the greater VMT.

Biological Resources

Impacts to candidate, sensitive, or special status species (including plants, wildlife, and fish) under this alterative would be greater than under the Plan, because this alternative's projected land use pattern would be less compact and would result in 12,274 acres of habitat degraded compared to 7,899 acres of habitat degraded under the Plan. While this alternative includes the same total population as the Plan and captures HQTA strategies, this alternative has a slightly less compact housing mix (57 percent homes and 70 percent jobs in growth priority areas) than the Plan (60 percent homes and 73 jobs percent, respectively) and includes a land use pattern that includes 4 percent of new housing in urban infill areas and 27 percent of new housing in standard suburban housing (compared to 21 percent urban infill and 16 percent standard suburban with the Plan). Further this alternative would have lower high species movement potential by 18,170 acres compared to the Plan.

Impacts to biological resources are directly linked to the amount of land disturbance and habitat conversion in non-urban areas. The land use pattern of this alternative would therefore result in additional conversion in natural habitats and greater impacts to biological resources. Without a more compact land use development pattern as included in the Plan, impacts to biological resources would be more widespread throughout the region and would be greater than the Plan.

Cultural Resources

Impacts to cultural resources (historic built environments, archeological and human remains, and important examples of major periods of California history or prehistory) under this alterative would be greater than under the Plan because this alternative's projected land use pattern would be less compact and include nearly 13,133 additional acres of development (greenfield). The additional land disturbance, such as grading and excavation, resulting from the projected land use pattern and planned transportation improvements of this alternative would result in greater likelihood of encountering unknown surface or subsurface archaeological or human remains; it would also result in greater impacts to the character of settings that contribute to the significance of historic built environments. Construction activities under this alternative would also have greater impacts to historic built environments, archaeological, human remains, and important examples of major periods of California history or prehistory for the reasons provided above.

Energy

The Existing Plans-Local Input Alternative would have greater impacts on the residential energy consumption than the Plan because of the less compact growth pattern (multi-family development is more energy and water efficient than single-family development). Total residential and commercial energy consumption under This alternative would result in an additional 28 trillion Btu, compared to the Plan. Residential and commercial building water use would be 539,233-acre feet higher than the Plan. VMT for this alternative would also increase by more than 11 million VMT. Overall, per-capita energy consumption under this alternative would be greater than under the Plan because this alternative would result in less compact development. Because this alternative includes more single-family homes, which require more energy per capita as compared to attached and multi-family homes, it would likely result in more energy use per capita as compared to the Plan. While compared to existing conditions, per capita energy consumption would go down under this alternative, however 2045 per capita energy consumption would be higher than under the Plan. Therefore, this alternative would result in greater impacts related to the wasteful, inefficient, or unnecessary consumption of energy during construction activities and long-term operations.

This alternative is likely to have a similar impact on state and local plans for renewable energy or energy efficiency as compared to the Plan. Use of some renewable energy sources could be facilitated, while the use of other renewable energy sources could be hindered by this alternative. Implementation of the California Energy Code and State goals for increasing the percentage of electricity from renewable and zero-carbon sources under this alternative would be the same as under the Plan.

Geology and Soils

Under this alternative, the following impacts associated with earthquakes and seismic activity would be the same as the Plan: rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides. Existing state and local building code requirements addressing substantial adverse effects due to earthquakes and seismic activity would apply to the projected land use pattern and planned transportation improvements of the Plan. The following operational and construction impacts of this alternative would be greater than the Plan because this alternative includes a less compact land use pattern that would develop nearly 13,133 additional acres: soil erosion and loss of topsoil; on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; development on expansive soil; and inadequate soils for alternative wastewater systems. The more compact land use pattern of the Plan would be expected to result in less land development within areas subject to adverse impacts from the geologic and soils conditions.

Impacts to unique geologic features and paleontological features would be greater under this alternative than under the Plan because the projected land use pattern of this alternative is less compact and would develop nearly 13,133 additional acres. The additional land disturbance resulting from the projected land use pattern combined with planned transportation improvements under this alternative would result in greater impacts to unique geologic features.

Greenhouse Gas Emissions

The GHG emissions for building energy and water-related energy are expected to be slightly greater under the Existing Plans-Local Input Alternative when compared to the Plan as it would develop less infill land use projects which tend to be more efficient than standard development. For transportation, the GHG emissions are projected to be greater under this alternative when compared to the Plan because of increased VMT. The Existing Plans-Local Input alternative would result in greater GHG emissions when compared to the Plan.

Per capita emissions would decrease under this alternative due to the land use strategies being implemented from the 2016 RTP/SCS . However, unlike the Plan, this alternative would not achieve SB 375 targets for 2035 as it would only achieve a 17 percent reduction and would not meet the 19 percent reduction target. The transportation network and land use pattern under this alternative would not achieve the same GHG emissions reductions as the Plan because the Plan includes more integrated transportation and land use strategies. SCAG has no control over many future emissions factors (e.g., energy and water demand), SCAG made extremely conservative assumptions regarding these factors.

Since meeting the regional reduction goals from cars and light-duty trucks would not be sufficient to meet the state's overall GHG reduction goals and the Existing Plans-Local Input Alternative would not meet the SB 375 targets, this alternative would conflict even more with AB 32 and SB 32. As such, this alternative would have a greater impact on GHG emissions than the Plan.

Hazards and Hazardous Materials

Hazardous materials impacts to the public or the environment associated with construction activities and operations under this alternative would be the same as the impacts under the Plan. This is because of the numerous federal, state, and local requirements and regulations that minimize the creation of significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials; through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and through handling of hazardous materials, substances, and waste within 0.25 mile of an existing or proposed school. These existing requirements and regulations would apply equally to the different projected land use patterns and planned transportation network

improvements of this alternative and the Plan, so impacts would be the same. The same is true for existing requirements and regulations addressing potential safety hazards and excessive noise within an airport land use plan or within two miles of a public or public use airport, so airport-related safety and noise impacts to people residing or working in the plan area would be the same under this alternative.

The more dispersed land use pattern would be more automobile-oriented than the Plan and could complicate emergency evacuation plans that rely in part on public transit. Therefore, the less compact land use pattern of this alternative would result in greater impacts associated with impairing the implementation of adopted emergency response and emergency evacuation plans.

Hydrology and Water Quality

Impacts associated with hydrology and water quality under this alternative would be greater than under the Plan because its significantly less compact land use pattern would result in disturbance to a larger land area during construction activities and would permanently convert a greater amount of land to impervious surfaces, such as parking lots, buildings, roadways, highways, and other paved areas, as compared to the Plan. The additional land area subject to construction disturbance would increase potential for short-term discharge of pollutants from construction sites into surface or groundwater. Construction impacts to hydrology and water quality would be greater under this alternative.

The Existing Plans – Local Input Alternative encourages a housing mix that is slightly less compact (40 percent multifamily and 28 percent single family large lot) than the Plan (42 percent and 27 percent, respectively). This alternative also includes 27 percent of new development as standard suburban compared to 16 percent standard suburban under the Plan. Additional impervious surfaces would interfere with groundwater recharge and alter drainage patterns in a manner that would increase the potential for substantial erosion, siltation, and flooding relative to the Plan. This alternative would require greater storm drainage system capacity than the Plan because of its conversion of additional land area to impervious surface area. In addition, the housing mix of this alternative would include a larger number of large-lot single-family homes which would result in more managed landscaping areas and associated pollutants such as nutrients, herbicides, and irrigated runoff, which in turn could adversely affect surface and groundwater quality, resulting in greater impacts than the Plan.

The projected land use pattern and planned transportation improvements of this alternative would have the same potential as the Plan to conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan due to the same total, anticipated population growth.

Land Use and Planning

The Existing Plans–Local Input Alternative has a similar transportation network as the Plan. New growth would occur consistent with local general plans as a result of the local input process and would overall be more dispersed compared to the Plan. The less compact land use pattern of this alternative provides less connectivity within existing communities because of its more dispersed allocation of future growth, but it would not physically divide any existing communities. This impact is the same as under the Plan. New roadway or highway improvements can physically divide existing communities by providing physical barriers where none previously existing. Expansion of existing roadways and highways also can physically divide existing communities to the extent that wider facilities with additional lanes represent greater physical barriers than narrower facilities. The planned transportation improvements of this alternative would be generally the same as the Plan and would result in similar land use impacts.

Because this alternative is largely based on local plan, conflict with plans could be reduced compared to the Plan. However, most general plans are not updated to reflect the year 2045, as such there is the potential for conflict with Plans that have not been updated to the Plan's horizon. This impact would therefore be similar and would be significant.

Mineral Resources

The Existing Plans-Local Input Alternative could result in greater loss of availability of known mineral resources that would be of value to the region and the residents of the state, as well as locally important mineral resources, due to the greater amount of land that would be converted to urban land potentially covering more mineral resource extraction opportunities. Transportation network improvements would occur similar to the Plan, requiring a comparable amount of aggregate resources to be used for the construction of the transportation network improvements. However, overall impacts related to aggregate would be greater than the Plan.

Noise

The Existing Plans-Local Input Alternative would generate noise levels generally similar to those that would be generated under the Plan because the same total population, housing, and employment are assumed. However, the less compact land use pattern of this alternative would direct more housing to non-urbanized areas, increasing localized operational noise levels in these areas that tend to have lower existing noise levels than more developed communities. Noise thresholds could be exceeded in these communities. The roadway and highway improvements under this alternative would be similar to the Plan and therefore impacts would be similar.

There would similar, but potentially greater construction-related noise impacts under this alternative due to the nearly 13,133 acres of additional land area (greenfield) that would be subject to disturbance during construction activities associated with the less compact land use pattern. This would increase the number of separate construction sites, which would exacerbate overall noise levels associated with construction activities. However, fewer sensitive receptors may be impacted due to construction occurring in less urban locations.

The projected land use pattern of this alternative, while less compact than the Plan, would not result in land use types that would result in different levels of vibration or groundborne noise. The planned transportation improvements would be the same as the Plan, this would also not result in significantly different levels of vibration or groundborne noise. This impact is the same under this alternative and would be significant.

Regarding aviation noise, this alternative would have similar impacts as the Plan. Neither the Plan, nor the alternatives affect airport operations or capacity. While different land use patterns could result in more or less housing in flight paths as compared to the Plan, there are a nearly infinite number of variables that could occur (flight path, housing location, zone changes, etc.). Overall, it is expected aviation noise impacts under this alternative would be largely similar to the Plan.

Population and Housing

Impacts related to population and housing should be similar under all alternatives, because the same number of people and dwelling units are assumed. The less compact land use pattern of this alternative have the potential to result in displacement of substantial numbers of people or existing housing that necessitates the construction of replacement housing elsewhere. Under this alternative, the same number of transportation investments would be made to the transportation network as in the Plan. As a result, impacts related to population growth, population displacement, and the need to construct replacement housing would be similar to the Plan and would be significant.

Public Services

This alternative is anticipated to result in public service impacts similar to those that would be generated under the Plan, because the same total population, housing, and employment are assumed and public service impacts are generally population driven. However, this alternative could worsen the ability to achieve local levels of service due to the more dispersed land use pattern that makes it more difficult to efficiently serve the population. This impact is greater than the Plan. The planned transportation improvements of this alternative would have the same public services impacts as the Plan.

Similarly, with regard to the need for additional schools and libraries, impacts would be similar to the Plan. This is because each alternative would result in the same population totals. While it is possible there could be less demand in urban areas and more demand in suburban areas, overall impacts would be similar to the Plan. Given the increased growth in suburban areas, this alternative could contribute to substantial adverse physical impacts associated with the construction and subsequent operation of new or physically altered school and library facilities in order to maintain acceptable service ratios. Impacts would be significant and similar to the Plan.

Recreation

This alternative is anticipated to result in recreation impacts less than those that would be generated under the Plan. Although the same total population, housing and employment are assumed, with no concentration of growth, the park usage would be more dispersed in urban and suburban areas leading to a reduced need for expansion or construction of recreation facilities, and place additional demand on larger regional parks; however as the region is well-served with regional parks, impacts would be reduced compared to the Plan. Impacts related to the construction of new parks would be similar to the Plan as the types of park construction impacts that would occur would be the same.

Transportation, Traffic, and Safety

The Existing Plans-Local Input Alternative would result in more miles traveled, more vehicle hours traveled, and more delay than the Plan. In 2045, this alternative would result in 23.41 VMT per capita and 14,539,787 VHT. Implementation of the Plan would reduce vehicle miles traveled by approximately 2 percent to 22.89 VMT per capita, reduce VHT by 3 percent to 14,130,874 VHT. VHD per capita would remain the same at 0.12; however total VHT would be reduced by 155,568.

The effects of growth and other external factors are included in the Regional Travel Demand Model that produces the results reported above. Because these external factors are modeled, the cumulative effects of regional growth are captured in the VMT, VHT, and VHD data under this alternative.

This compact development pattern included in the Plan would concentrate population in urban areas and encourage alternative modes of travel other than automobiles. While this alternative captures the HQTAs-focus based on local plans, it encourages a land use pattern and housing mix that is slightly less urban, less compact, and more suburban compared to the Plan. Also, this Alternative has slightly less compact land use and transit coordination in HQTAs (46% homes and 55% jobs) than that for the Plan (48% homes and 59% jobs). Vehicle miles traveled, vehicle hours of delay, worker commute trips, and accident rates would be higher than under the Plan resulting in a less efficient transportation system

overall. Further, this alternative would not achieve VMT reductions necessary to meet the state's climate goals.

Tribal Cultural Resources

This alternative would result in greater impacts to tribal cultural resources when compared with the Plan. Under this alternative, there would be an additional 13,133 acres of greenfield land consumed, which would have the potential to impact previously undiscovered tribal cultural resources, such as archaeological resources, sacred sites, or human remains. Due to the less compact land use pattern and the increase in greenfield consumed, impacts would be greater under this alternative and would be significant.

Utilities and Service Systems

This alternative is anticipated to result in similar impacts to utilities and service systems to those that would be generated under the Plan because the same total population, housing, and employment are assumed, and these areas are generally population driven. The larger share of single-family homes under this alternative would likely increase the demand for surface and groundwater supplies because such housing units have higher demand for water, for example due to increased irrigation demand for landscaping areas and additional appliances and fixtures that use potable water (e.g., sinks, toilets, showers). As a result, this alternative could exceed the capacity of existing water storage, conveyance, distribution, and treatment facilities to a greater degree than the Plan and result in construction of new, expanded, or relocated facilities.

The population assumed in alternative is the same as under the Plan, thereby resulting in similar need for solid waste disposal and transfer facilities to accommodate the population.

In addition, this alternative could adversely affect the capacity of the necessary utility conveyance and distribution systems (e.g. wastewater and storm drain) due to a more dispersed projected land use pattern that makes it more difficult to efficiently serve the population. All of the alternatives would be required to follow the same federal, state, and local statutes and regulations related to solid waste. This alternative would have the same impact related to solid waste generation and conflicts with solid waste management and reduction statutes and regulations.

Wildfire

The Existing Plans-Local Input Alternative would result in greater wildfire threat than the Plan. This alternative consumes 13,133 more greenfield acres than the Plan and would result in an additional 43,692

housing units in wildfire risk areas compared to the Plan. Additionally, it includes the same transportation investments as the Plan. However, the more dispersed pattern of development would result in a greater wildfire risk than the Plan. Impacts would be significant.

Alternative 3: Intensified Land Use Alternative

Aesthetics

The Intensified Land Use Alternative has the highest percentage of new housing as urban infill (16 percent) and the smallest development footprint among the alternatives and the Plan. Impacts to scenic resources from the land use pattern under this alternative in urban areas would be greater than under the Plan because this alternative assumes higher density and intensity of development; however, the impact would be less in suburban and rural areas as less development would occur in these locations. New structures would be taller and more concentrated, with greater likelihood of blocking or impeding scenic vistas. Impacts from transportation projects to scenic vistas would be the same as the Plan since the transportation network would be the same as the Plan.

The potential for substantial degradation of visual character or quality of public views of sites and their surroundings in non-urbanized areas would be less under this alternative as compared to the Plan because under this alternative a smaller share of the projected land use pattern would be located within existing non-urbanized areas. Impacts to visual quality in urbanized areas would similar to the Plan because existing zoning and other regulations typically address visual quality and would be equally enforced under this alternative. With development focused in urban areas there would be less potential for light and glare impacts as light and glare is already occurring in urban areas, and impacts would be less than the Plan, but would remain significant.

Agriculture and Forestry Resources

Conversion of agricultural land (including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance), forest land, timberland, and timberland zoned Timberland Production to non-agricultural, non-forest, or non-timber uses under this alternative would be greater than under Plan because the projected land use pattern under the Intensified Land Use Alternative convert 1,831more acres of agricultural land to urban use, although the transportation network would be generally the same. The more compact land use pattern would reduce the amount of land disturbance overall (less greenfield developed). Under this alternative, there would be 9,299 fewer greenfield acres converted to other uses compared to the Plan. The improved land use and transit coordination would require less acreage to accommodate future growth and a higher concentration of development in urban areas will reduce the

conversion of agricultural uses. However, the loss of agricultural land would still be significant and would be greater than with the Plan.

The potential for conflicts with zoning, land use designations, Williamson Act contracts, and/or other applicable regulations that protect agricultural would also be greater for the same reasons. However, the potential for conflicts with agricultural lands would still be significant. Regarding forest land, impacts would be similar to the Plan due to the similar transportation networks and would remain significant.

Air Quality

The Intensified Land Use Alternative would have the same population, housing, and employment as the Plan, but would result in a denser land use pattern. Similar to the Plan, construction emissions would likely exceed the significance thresholds established in the *CEQA Guidelines* and result in a significant short-term impact especially considering multiple projects occurring in a condensed area. In the long term, Alternative 3 would have a similar impact to the local AQMPs and a reduced cumulative impact since development projects would be more efficient than the Plan, resulting in fewer emissions.

As with the Plan, under this alternative results in substantial reductions in cancer risk levels associated with diesel particulate matter would occur as compared to existing conditions. The cancer risk and impact to public health for this alternative would be similar compared to the Plan since the transportation network is the same as the Plan with minor adjustments for land use and transit coordination strategies (**Table 4.0-5, Connect SoCal Compared to Intensified Land Use Alternative: Summary of Maximum Exposed Individuals Residential 30-Year Exposure Cancer Risk**).

Table 4.0-5
Connect SoCal Compared to Intensified Land Use Alternative: Summary of Maximum Exposed Individuals Residential 30-Year Exposure Cancer Risk

Segment No.	Transportation Segment	County/Region	Intensified Land Use Alternative (risk in a million)	Connect SoCal Plan (risk in a million)
1	IMP I-8	Imperial/El Centro	14.2	14.5
2	IMP SR-78	Imperial/Westmoreland	19.6	18.9
3	LA I-110	Los Angeles/Carson	23.7	23.5
4	LA I-710	Los Angeles/Compton	31.3	30.9
5	LA SR-60 DB	Los Angeles/Diamond Bar	29.2	29.7
6	LA SR-60 SEM	Los Angeles/ South El Monte	16.9	16.3
7	ORA I-5	Orange/ Orange	5.59	5.49
8	ORA I-405	Orange/ Seal Beach	11.9	11.8
9	RIV I-10	Riverside/ Banning	4.83	4.83
10	RIV SR-15	Riverside/ Temecula	9.54	9.52
11	RIV SR-91	Riverside/ Corona	8.38	8.41
12	SB I-15 ONT	San Bernardino/Ontario	10.9	10.5
13	SB I-15 VIC	San Bernardino/ Victorville	41	41.3
14	SB SR-60	San Bernardino/ Ontario	18.5	18.8
15	VEN US-101 SB	Ventura/ San Buenaventura	4.84	4.85
16	VEN US-101 TO	Ventura/ Thousand Oaks	22	21.9

Source: Impact Sciences, 2019.
Note: Segments 2-4, 6-8, 10, 12, and 16 under Alternative 3 would have higher health risks than the Plan.

Health risk associated with construction activities would be similar to the Plan and potentially significant adjacent to extended intense construction activities.

Objectionable odors are expected to be similar as well since construction impacts will be similar to the Plan.

Overall impacts to air quality could be incrementally less when compared to Connect SoCal due to the more compact growth pattern and reduced VMT.

Biological Resources

Impacts on candidate, sensitive, or special status species (including plants, wildlife, and fish) under the Intensified Land Use Alternative would be less than under the Plan because this alternative's projected land use pattern would be more compact and include approximately 9,299 fewer acres of greenfield development, this alternative would result in incrementally less impact related to biological resources

when compared with the implementation of the Plan. Impacts to biological resources are directly linked to the amount of native habitat conversion in non-urban areas a potential project proposes. Under this alternative, there would be an additional 990 acres of high species movement potential maintained compared to the Plan. While this alternative would affect fewer acres of natural lands, impacts to biological resources in and near the urban areas would remain significant because impacts to sensitive species could still occur.

Cultural Resources

Impacts to cultural resources (historic built environments, archeological, and human remains, and important examples of major periods of California history or prehistory) under this alterative would be less than under the Plan because this alternative's projected land use pattern would be more compact and include approximately 9,299 fewer acres of greenfield development in the same transportation network. The reduced land disturbance, such as grading and excavation, resulting from the projected land use pattern of this alternative would result in lower likelihood of encountering unknown surface or subsurface archaeological, or human remains. However, increased development in urban areas, where historic buildings tend to be located could result in greater impacts to the character of settings that contribute to the significance of historic built environments, as pressure to redevelop historic buildings increases. Construction activities under this alternative would also have less impacts to historic built environments, archaeological, human remains, and important examples of major periods of California history or prehistory for the reasons provided above.

Energy

The Intensified Land Use Alternative contains more infill development to accommodate a higher proportion of growth in more energy-efficient housing types like townhomes, apartments, and smaller single-family homes, as well as more compact commercial building types. As a result, residential energy consumption, building energy consumption, and water consumption would incrementally decrease compared to the Plan because there would be a higher percentage of multi-family units and higher density in the land use. Individual detached structures require more energy for materials, more materials overall, and more fuels to build than would be needed for attached structures. This alternative also includes a housing mix with fewer single-family homes (48 percent) and more townhome or multifamily homes (8 and 44 percent) as compared to the proposed Plan (48 percent single family and 8 and 42 percent multi-family, respectively). As a result, this alternative would likely result in lower energy use per capita because attached homes require less energy per capita as compared to large-lot single-family homes. At 335 trillion Btu, this alternative's residential energy would result in similar but somewhat lower consumptive energy use than the Plan (338 trillion Btu). Per-capita energy consumption under this

alternative would be lower than under the Plan because this alternative would result in a more compact land use pattern. This alternative would result in less impacts related to the wasteful, inefficient, or unnecessary consumption of energy during construction activities and long-term operations. Impacts would continue to be less than significant.

This alternative is likely to have less impact on state and local plans for renewable energy or energy efficiency as compared to the Plan as it would be overall more energy efficient. Implementation of the California Energy Code and State goals for increasing the percentage of electricity from renewable and zero-carbon sources under this alternative would be the same as under the Plan.

Geology and Soils

The following impacts associated with earthquakes and seismic activity under this alternative would be the same as the Plan: rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides. Existing state and local building code requirements addressing substantial adverse effects due to earthquakes and seismic activity would apply to the land use pattern and planned transportation improvements of the Plan. The following operational and construction impacts of this alternative would be less than the Plan because this alternative includes a more compact land use pattern that would develop approximately 9,299 fewer acres: soil erosion and loss of topsoil; on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; development on expansive soil; and inadequate soils for alternative wastewater systems.

Impacts to unique geologic features would be less under this alternative than under the Plan because the land use pattern of this alternative is more compact and would develop fewer acres in the same transportation network. The decreased land disturbance resulting from the projected land use pattern and planned transportation improvements under this alternative would result in less impacts to unique geologic features.

Greenhouse Gas Emissions and Climate Change

The GHG emissions for building energy and water-related energy are expected to be less with the Intensified Land Use Alternative compared to the Plan as this alternative would develop a more intense land use pattern with increased infill and compact development which tends to be more efficient than large lot development. For transportation, the GHG emissions are projected to be less under this alternative compared to the Plan because of decreased VMT. This alternative would improve regional GHG emissions compared to the Plan.

As with the Plan, this alternative would reduce per capita GHG emissions from cars and light-duty trucks compared to the 2005 baseline so it would achieve both the 8 percent target set for 2020 and exceed the 19 percent set for 2035, set pursuant to SB 375.

Since meeting the regional reduction goals from cars and light-duty trucks would not be sufficient to meet the state's overall GHG reduction goals this alternative would conflict with AB 32 and SB 32. The Plan would have the same impact as this alternative.

Hazards and Hazardous Materials

Hazardous materials impacts to the public or the environment associated with construction activities and operation under this alternative would be the same as the impacts under the Plan. This is because of the numerous federal, state, and local requirements and regulations that minimize the creation of significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials; through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and through handling of hazardous materials, substances, and waste within 0.25 mile of an existing or proposed school. These existing requirements and regulations would apply equally to the different projected land use patterns and planned transportation network improvements of this alternative and Plan, so impacts would be the same. The same is true for existing requirements and regulations addressing potential safety hazards and excessive noise within an airport land use plan or within two miles of a public or public use airport, so airport-related safety and noise impacts to people residing or working in the plan area would be the same under this alternative.

The more compact land use pattern under this alternative would be more transit-oriented than the Plan and could complement emergency evacuation plans that rely in part on public transit to a greater degree. Therefore, this alternative would result in less impacts associated with impairing the implementation of adopted emergency response and emergency evacuation plans.

Hydrology and Water Quality

Impacts associated with hydrology and water quality under this alternative would be less than under the Plan because its more compact land use would result in disturbance to a smaller land area during construction activities and would permanently convert a smaller amount of land to impervious surfaces, such as parking lots, buildings, roadways, highways, and other paved areas, as compared to the Plan. The decreased land area subject to construction disturbance would decrease potential for short-term discharge of pollutants from construction sites into surface or groundwater.

The decreased land area permanently converted to impervious surfaces would decrease the potential volume and increase the water quality of stormwater flows relative to the Plan. Less impervious surface also would reduce interference with groundwater recharge and result in less alteration of drainage patterns in a manner that would increase the potential for substantial erosion, siltation, and flooding. This alternative would require less storm drainage system capacity than the Plan because of its conversion of reduced land area to impervious surface area. In addition, the housing mix of this alternative would include a smaller share of single-family homes, which would result in less managed landscaping areas and associated pollutants such as nutrients, herbicides, and irrigated runoff, which in turn could adversely affect surface and groundwater quality. Impacts to groundwater recharge, erosion, siltation and flooding would be less than the Plan but would remain significant.

Land Use and Planning

The more compact land use pattern of this alternative provides more connectivity within existing communities, so it would not physically divide any existing communities. This impact is the same as under the Plan. New roadway or highway improvements can physically divide existing communities by providing physical barriers where none previously existing. Expansion of existing roadways and highways also can physically divide existing communities to the extent that wider facilities with additional lanes represent greater physical barriers than narrower facilities. The planned transportation improvements of this alternative would be generally the same as the Plan network, which means it would result in similar impacts from physically dividing existing communities.

Because this alternative would include a more compact land use that would result in decreased land disturbance relative to the Plan, it would have less impacts to resources within the region including agriculture, biological resources, and recreational land. Alternative 3 would result in similar impacts with regard to physically dividing an established community due to the similar scale and number of transportation projects being constructed. This alternative would have greater potential to conflict with local land use plans as the greater amount of infill projected may be beyond what is currently considered in some local land use plans. This impact would be greater than the Plan and would be significant.

Mineral Resources

Alternative 3 could result in less loss of availability of known mineral resources that would be of value to the region and the residents of the state, as well as locally important mineral resources, due to the reduction in land that would be converted to urban land potentially covering more mineral resource extraction opportunities. Transportation network improvements would occur similar to the Plan, requiring a comparable amount of aggregate resources to be used for the construction of the

transportation network improvements. Although transportation network impacts would be similar under this alternative, overall impacts would be less than the Plan and would remain significant.

Noise

This alternative would generate noise levels generally similar to those that would be generated under the Plan because the same total population, housing, and employment are assumed. However, the more compact land use pattern of this alternative would direct less housing growth to in non-urbanized areas, decreasing construction and operational noise levels relative the Plan in areas that tend to have lower existing noise levels than more developed communities. Noise thresholds would be less likely to be exceeded.

The projected land use pattern of this alternative, while more compact than the Plan, would not result in land use types that would result in different levels of vibration or groundborne noise. There would potentially be less construction-related noise impacts under this alternative due to the approximately 9,299 fewer acres of land area that would be subject to disturbance during construction activities associated with the less compact land use pattern. This would decrease the number of separate construction sites, which would decrease overall noise levels associated with construction activities relative to the Plan.

The planned transportation improvements of this alternative would include the same lane miles of roadway and highway improvements, and this would also not result in significantly different levels of vibration or groundborne noise relative to the planned transportation improvements identified in the proposed Plan. This impact is the same under this alternative and would remain significant. With regard to aviation noise, impacts would be similar to the Plan as this alternative would not affect airport capacity.

Population and Housing

Impacts related to population and housing would be similar under all alternatives, because the same number of people and dwelling units are assumed. The more compact land use pattern of this alternative combined with the same lane miles of roadway and highway improvements would not result in displacement of substantial numbers of people or existing housing that necessitates the construction of replacement housing elsewhere. This impact is the same as the Plan and would remain significant.

Public Services

This alternative is anticipated to result in public service impacts similar to those that would be generated under the Plan, because the same total population, housing, and employment are assumed. However, this alternative could result in less demand on the ability to achieve local levels of service due to the more compact land use pattern that makes it more efficient to serve the population. This impact is less than the Plan. The planned transportation improvements of this alternative would have the same public services impacts as the Plan. It is possible that denser development in urban areas, although more efficient from a service perspective, could result in the need for more police and fire services from a demand perspective resulting in a need for new facilities to maintain service ratios. Nonetheless, due to the more efficient land use pattern, this impact would be less than the Plan. Similarly, the more compact land use pattern would more efficiently serve the population for schools and libraries. However, there still could be need for new facilities resulting in physical impacts. As such this impact would be significant, but less than the Plan.

Recreation

With the same population growth across all alternatives impacts would be expected to be similar. However, with more compact development, there could be increased pressure on urban parks which are currently overburdened. With higher population density, there would more use of the same parks, leading to greater deterioration of existing recreational facilities in urban areas. As such, impacts could be greater than the Plan.

Transportation, Traffic, and Safety

The Intensified Land Use Alternative would result in greater transportation impacts than the Plan. Alternative 3 would result in slightly lower VMT (total and per capita), less VHD and less VHT. In 2045 Alternative 3 would result in 22.83 VMT per capita, 14,074,675 VHT and 2,619,980 VHD. Comparing these number to the Plan (22.89 VMT per capita, 14,130,874 VHT and 2,668,229 VHD. Despite the overall reduction in VMT and VHD as compared to the Plan, this alternative does not maximize mobility and accessibility for all people and goods in the region to the extent of the Plan because it results in more severe localized traffic congestion conditions with adverse mobility and reliability consequences for goods and people (increased vehicle and truck delay). The effects of growth and other external factors are included in the Regional Travel Demand Model that produces the results reported above. Because these external factors are modeled, the cumulative effects of regional growth are captured in the VMT, VHT and VHD data for this alternative. This alternative could increase localized congestion and compromise accessibility to destinations which would result in more adverse effects related to safety considerations for pedestrians, cyclists, and motorists. Hence, this Alternative could have somewhat more adverse

impacts than the Plan related to design hazards. Regarding emergency access, the more dense land use patterns of this alternative could result in more efficient emergency access. Impacts would be less than the Plan.

Tribal Cultural Resources

This alternative would result in less impacts to tribal cultural resources when compared with the Plan. Under this alternative, there would be 9,299 fewer acres of greenfield land consumed, which would reduce the potential to impact previously undiscovered tribal cultural resources, such as archaeological resources, sacred sites, or human remains. Due to the more compact land use pattern and the reduction in greenfield consumed, impacts would be less under this alternative.

Utilities and Service Systems

This alternative is anticipated to result in impacts to utilities and service systems similar to those that would be generated under the Plan because the same total population, housing, and employment are assumed. With less single-family homes, this alternative could decrease demand for surface and groundwater supplies because such housing units have higher demand for water. Single family homes typically required additional water due to increased irrigation demand for landscaping areas and additional appliances and fixtures that use potable water (e.g., sinks, toilets, showers). As a result, this alternative could exceed the capacity of existing water storage, conveyance, distribution, and treatment facilities to a lesser degree than the Plan. These impacts of this alternative are less than under the Plan but would remain significant.

This alternative could result in greater impacts related to adversely affecting the capacity of the necessary utility conveyance and distribution systems (e.g. wastewater, storm drain,) due to the more compact land use pattern that, although more efficient, in many urban areas is aging and may not be capable of supporting increased loads. Overall the alternative would demand less water and energy during construction compared to the Plan. All alternatives would be required to follow the same federal, state, and local statutes and regulations related to solid waste. This alternative would have the same impact related to solid waste generation and conflicts with solid waste management and reduction statutes and regulations

Wildfire

The Intensified Land Use Alternative would result in fewer impacts related to wildfires than the Plan. This alternative would result in fewer housing units in wildfire zones compared to the Plan. Therefore,

fewer people and structures would be placed within proximity to wildfire-prone areas at urban-wildland interfaces. Impacts would be less than the Plan.

4.4 ABILITY OF ALTERNATIVES TO MEET THE PROJECT OBJECTIVES

The effectiveness of each of the alternatives to achieve the basic objectives of the Plan has been evaluated in relation to the statement of goals and guiding principles described above. Although the No Project Alternative is not capable of meeting most of the goals of the Project, it has been analyzed, as required by CEQA.

The Existing Plans – Local Input Alternative, meets some but not all the project goals. Specifically, it is less effective than the Plan in meeting Plan goals:

1. Encourage regional economic prosperity and global competitiveness. The Existing Plans – Local Input Alternative would not include the strategies in the Plan (for example, strategies related to job centers and goods movement) that will enhance regional prosperity.

2. Improve mobility, accessibility, reliability, and travel safety for people and goods. As demonstrated above, the Existing Plans – Local Input Alternative would not reduce VMT to the same extent as the Plan and would not achieve the GHG reduction goals set by CARB.

3. Enhance the preservation, security, and resilience of the regional transportation system. The Existing Plans – Local Input Alternative does not include the Plan's safety and resilience strategies and therefore would not achieve this goal.

4. Increase person and goods movement and travel choices within the transportation system. The Existing Plans – Local Input Alternative does not include the goods movement strategies aimed at increasing person and freight mobility, including critical access projects.

5. Reduce greenhouse gas emissions and improve air quality. The Existing Plans – Local Input Alternative would not reduce greenhouse gas emissions or improve air quality to the same extent as the Plan.

6. Support healthy and equitable communities. The Existing Plans – Local Input Alternative would not include the regional strategies for complete streets and jobs/housing balance and planning for trips that reduce dependence on solo car trips.

7. Adapt to a changing climate and support an integrated regional development pattern and transportation network. The Existing Plans – Local Input Alternative would not include the "green

region" strategies such as supporting climate action plans, renewable energy production, and integrated food production.

8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel. The Existing Plans – Local Input Alternative would not include strategies such as promoting low emissions technologies, shared rides, car and bike sharing and scooters, as well as improving access to services through technology.

9. Encourage development of diverse housing types in areas that are supported by multiple transportation options. The Existing Plans – Local Input Alternative would not include the Plan's strategies to focus growth near destinations and mobility options.

10. Promote conservation of natural and agricultural lands and restoration of critical habitats. The Existing Plans – Local Input Alternative would result in the consumption of more natural lands and habitat lands as compared to the Plan.

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

6. Support healthy and equitable communities. The Intensified Land Use Alternative would not achieve this goal to the same extent as the Plan due to its focus on compact development beyond what is currently contemplated under the Plan. The emphasis on development in urban communities may result in overuse of parks and other services (police, fire, schools, library) which has the potential to result in quality of life impacts in urban areas.

As further described below, consideration of alternatives requires careful examination of the multiple facets of each alternative. For example, while urban development may preserve farmland or other natural resources, it could place a burden on urban parks, schools, police and fire services, and aging infrastructure.

4.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6 of the *State CEQA Guidelines* requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No

Project alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

For purposes of this PEIR, the impacts associated with reducing global GHG emissions and regional air pollutants must be examined alongside the other adverse impacts that are caused by increasing the density and intensity of the region's development patterns and, for example, bringing people closer to sources of air pollutants such as transit corridors and freeways (even though these sources would have fewer emissions in the future, despite increasing traffic, due to emission controls). The tension between CEQA's mandate to reduce all types of impacts to the maximum extent feasible, and the statutory mandates of reducing GHG emissions under AB 32, SB 32 and SB 375, is a well-recognized CEQA compliance challenge.[9] CEQA does not provide any legal mechanism for "weighting" environmental impacts, and scoring some categories of impacts as "more important" and others as "less important." Instead, CEQA is structured to require the disclosure of all impacts for each alternative and the Plan, to foster informed decision making and to disclose the inherent trade-offs between different types and magnitudes of impacts associated with different alternatives.

As indicated by the comparative analysis, the Plan and each Alternative result in many impacts that are "significant and unavoidable" under CEQA. Alternative 3, the Intensified Land Use Alternative, would result in somewhat less adverse impacts for nine of the 20 environmental issues that were analyzed. The anticipated increases in the density and intensity of development within the region's established communities under Alternative 3 would result in more localized impacts that are greater than the Plan in four areas (land use; noise; public services and recreation). This alternative would also consume more agricultural land.

Of the three alternatives, the Intensified Land Use Alternative would be considered the environmentally superior alternative due to fewer impacts to reduced VMT and GHG emissions, and because it would substantially restrict the use of land for single-family development, in a manner that differs from the adopted general plans of the six counties and 191 member cities in the SCAG region. This alternative concentrates development in existing urban centers. and near transit stations and activity centers. As such, the Intensified Land Use has less impact on rural and undeveloped areas, specifically greenfields. However, the Intensified Land Use Alternative would have more severe impacts on the built environment (i.e., seven CEQA impact categories: land use; noise and vibration, public services, traffic delay, and overtaxed recreation facilities in the vicinity of HQTAs).

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9 Adams, Tom (California League of Conservation Voters), and Amanda Eaken and Anne Nothoff (Natural Resources Defense Council). 2010. Tackling California's Global Warming Challenge: A Guide to SB 375, by Tom Adams (California League of Conservation Voters), p. 24.

While the Intensified Land Use Alternative would be considered the environmentally superior alternative because of the more compact land use patterns fewer emissions and reduced VMT, this alternative requires implementation of the same mitigation measures required for the Connect SoCal Plan and would not resolve any of the significant and unavoidable impacts of the Plan. However, the more intensified and compact land use development pattern would result in somewhat less adverse impacts to energy, land, and water resources due to the denser pattern of development. The Intensified Land Use Alternative would also achieve greater overall reductions in criteria air pollutants and greenhouse gas emissions, as a result of the more compact pattern of land use development. The level of impact for the Existing Plan – Local Input Alternative and the Intensified Land Use Alternative varies in relation to the land use development pattern, but neither is capable of avoiding any of the significant and unavoidable impacts of the Plan, because those impacts are primarily associated with net increase in population anticipated for the SCAG region. Therefore, the comparative impacts between the alternatives and the Plan are primarily related to the level of severity of the impacts.

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

As discussed throughout this PEIR, SCAG has no land use authority; rather it sets regional land use policy. SB 375 addresses the land use component (in the context of transportation planning) of statewide efforts to achieve AB 32 GHG reduction goals that include all sectors of the economy. In order to meet the SB 375 targets for statewide GHG reductions, CARB identified that SCAG must plan to reduce GHG emissions by 19 percent by 2035. SCAG has developed the SCS (the regional land use policy component of Connect SoCal) which sets forth land use strategies to meet these GHG emissions reduction targets. Actual implementation of the SCS will be undertaken by local jurisdictions through general plans and specific plans and through actions on individual projects.

While the Intensified Land Use is one potential generalized land use scenario that results in achieving CARB GHG targets (as well as reducing impacts on open space and agricultural lands), the Intensified Land Use Alternative would have other impacts. For example, the Intensified Land Use Alternative would result in more development in urban areas potentially overloading infrastructure in some areas. The jurisdiction that is anticipated to receive most of the infill development under this alternative is the City of Los Angeles. It is possible, that the zoning in the City of Los Angeles would be sufficiently flexible to accommodate the additional units by 2045, but it is not certain that it would. This scenario assumes that very little development would be approved outside urban areas, which could require zoning

changes or land use interventions beyond those currently in place. In addition, as urban areas become denser (more units per acre), urban infrastructure is used more:

- Water and sewer lines are required to carry more, greater than the current capacity, which could result in the need to construct additional capacity in the older infill areas at significant cost.
- Demand for police and fire services increases requiring expansion of existing stations and service personnel (although significant environmental impacts are not anticipated from such construction).
- Parks are used more, resulting in potential crowding and/or over use, with facilities becoming worn and substandard (grass becomes over used and dies, equipment breaks, etc.) and/or the need to construct more parks and recreational facilities.

Passenger vehicle transportation infrastructure cannot accommodate peak period volumes creating increased congestion, noise and air emission impacts. Increasing population in the infill core areas could also reduce mobility for goods movement which cannot use alternative modes during peak periods, resulting in more trucks in stop and go traffic, impacting air quality, and noise. While development outside urban areas would likely require the construction of new infrastructure, it would occur in less populated areas and would expose fewer people to construction impacts. Also, in general infrastructure in less urban areas has greater available capacity since infrastructure is generally sized for capacities that can accommodate substantially more than the current densities (parks, police stations, water lines, etc. have minimum sizes that can generally accommodate more than rural level density). New development on the periphery is often closer to higher capacity sewer trunk lines, treatment plants and water wells, lowering infrastructure costs compared to retrofitting older existing urban areas.

Furthermore, as more people are located in the same area, urban impacts increase. Congestion increases, noise and air emissions in proximity to sensitive receptors (residences, schools, hospitals, etc.) also increase.

Each community must determine what level of population it can support – balancing infrastructure capacity and population density. In developing the Plan, SCAG has satisfied its obligation under SB 375 to identify a policy and growth pattern that meets desired GHG reduction goals.

The Plan provides general guidance on location of development. The Plan does not impose specific land use controls. This EIR evaluates a number of potential scenarios. It will be up to each jurisdiction to interpret the Connect SoCal land use strategies and through ongoing monitoring of key performance measures (in cooperation with SCAG), monitor GHG reductions. Through ongoing monitoring SCAG

will adjust regional policy as needed (in the next RTP/SCS or in interim amendments if needed) to ensure that the region complies with applicable State law including AB 32 and SB 375.

SCAG is not rejecting the Intensified Land Use Alternative or any alternative with increased density and/or greater percentage of high-density housing that might fall between the Intensified Land Use Alternative and the Plan as a possible land use scenario for 2045. Rather, SCAG is rejecting the inclusion of policies in the Plan that would impose extensive land use intervention (to mandate specific land use densities and/or specific locations) with local jurisdictions because SCAG has no land use authority and no mechanism exists to impose detailed land use changes.