September 1, 2020

The Honorable Rex Richardson  
Mr. Kome Ajise  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, California 90017

RE: Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

Dear President Richardson and Mr. Ajise:

The undersigned organizations, which represent thousands of people throughout California, are writing to comment on the Southern California Association of Governments’ (“SCAG”) Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“Plan”).

We are heartened to see that SCAG has provided additional discussion and mitigation measures regarding conservation issues in the Final Connect SoCal Technical Refinements and PEIR Addendum. However, we are concerned that the Plan may push Southern California’s imperiled mountain lions closer to extinction by streamlining the approval of more highways and sprawl development in key connectivity areas. The Plan could and should do more to discourage large-scale development in fire-prone areas, and it improperly includes development proposals in the Plan that are clearly inconsistent with California’s climate goals. While there are positive aspects of the Plan and we believe the Plan should be approved for purposes of finalizing the existing Regional Housing Needs Assessment (RHNA) process targets, we believe the Plan should thereafter be amended to address the issues in this letter. We urge SCAG to work collaboratively with stakeholders to further improve the Plan.
The Plan can do more to address connectivity for Southern California’s imperiled mountain lions

We are encouraged to see that SCAG has improved their mitigation measures to reduce impacts to wildlife connectivity and provided additional guidance for project-level mitigation measures based on previous comment letters. Lack of regional connectivity especially impacts Southern California mountain lions. If nothing is done to preserve remaining corridors and enhance connectivity at existing barriers, scientists predict that the Santa Ana and Santa Monica mountains populations could become extinct within 50 years or less. If inbreeding depression occurs, scientists predict these populations could disappear within 12-15 years. Other populations in the San Gabriel and San Bernardino Mountains are showing similar patterns of an extinction trajectory.

Therefore, it is concerning that the $1 billion funding to develop a Regional Advanced Mitigation Program remains unidentified and no funding is provided for badly needed wildlife crossings. Meanwhile, the Plan still streamlines the funding and development of numerous highway expansion projects that will impair regional connectivity. In the Plan’s 300-page project list, there is only a single listed proposal for a wildlife crossing. SCAG should prioritize funding for public transit and adequate wildlife crossings on existing highways. The Plan also should require that highway projects include adequate wildlife crossings and fully mitigate impacts on connectivity if they are to be considered “consistent” with the Plan.

The Plan should discourage development in fire-prone areas

We are encouraged to see revisions in the Addendum that include developing a Regional Climate Adaptation Framework and additional suggested mitigation measures at the project level. However, as currently written, the Plan envisions adding thousands of acres of development to fire-prone areas. The science is clear that the vast majority of wildfires in Southern California are caused by humans, and inducing sprawl development in high fire hazard areas could increase the likelihood and frequency of such fires. The Plan can and should discourage further development in high fire hazard severity areas by stating that such development is inconsistent with the Plan. Instead, more housing density should be encouraged and supported in infill urban areas.

Including unsustainable development proposals in the Plan undermines the goals of the Plan

We understand that SCAG is “work[ing] with local authorities to identify and restore locally approved entitlements as conveyed by local jurisdictions.” However, if SCAG sees its role as simply “including” existing entitlements to the Plan, the Plan may result in the streamlining of approval of unsustainable development projects favored by local politicians. For instance, the Plan now includes Tejon Ranchcorp’s 12,000-acre “Centennial” development at the northern edge of L.A. County, which would destroy vital habitat in a critical mountain lion movement corridor important for statewide genetic connectivity.

According to the California Air Resources Board, the Centennial development “substantially conflicts with the State's climate goals” and “its laudable housing goals do not
outweigh the public health, environmental, and quality of life costs that will be imposed by its
development.” Likewise, the Plan’s Transportation Project List earmarks $600,000,000 for the
138 Northwest Corridor Improvement Project to accommodate the immense traffic generated by
the Centennial development. Elsewhere, the Plan concedes it “will result in the direct
consumption of 41,546 acres of greenfield [including areas with] a high potential to contain
sensitive plant communities and riparian habitats.”

If SCAG chooses to include clearly unsustainable development proposals and
infrastructure projects like Centennial in the Plan, SCAG should state that those projects conflict
with the goals of the Plan, but are being included for forecasting purposes.

Conclusion

We appreciate the efforts of SCAG staff to engage stakeholders in the process and
provide thoughtful revisions based on previous comments. However, there is an opportunity for
more to be done as we aspire to sustainable communities and coexistence with California’s
unique flora and fauna. We urge SCAG to approve the Plan for purposes of finalizing the
existing RHNA process targets, and then work to amend the Plan with stakeholders to address
the issues outlined in this letter.

Sincerely,

J.P. Rose
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