



SACRAMENTO AREA COUNCIL OF GOVERNMENTS

Final Environmental Impact Report
for the
Metropolitan Transportation Plan/
Sustainable Communities Strategy 2035 Update

State Clearinghouse # 2011012081

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**NOTICE OF AVAILABILITY
OF THE FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
METROPOLITAN TRANSPORTATION PLAN/
SUSTAINABLE COMMUNITIES STRATEGY FOR 2035**

AND

**NOTICE OF PUBLIC MEETINGS
ON THE
METROPOLITAN TRANSPORTATION PLAN/
SUSTAINABLE COMMUNITIES STRATEGY FOR 2035**

DATE: February 23, 2012
TO: Interested Agencies and Individuals
FROM: Sacramento Area Council of Governments

The Final Environmental Impact Report (SCH #2011012081) for the Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 (MTP/SCS) is now available for review. Information on how the public can continue to be involved is provided below.

The MTP/SCS and the associated EIR cover the area within the counties of Sacramento, Yolo, Yuba, Sutter, Placer, and El Dorado (excluding the Lake Tahoe basin). The MTP/SCS, prepared in coordination with cities, counties, and other public agencies in the SACOG region, is a long-range transportation plan and sustainable communities strategy to serve existing and projected residents and workers within the Sacramento region through the year 2035. The MTP/SCS accommodates another 871,000 residents, 361,000 new jobs, and 303,000 new homes with a transportation investment strategy of \$35 billion. SACOG is required under federal and state law to update the MTP/SCS every four years.

The MTP/SCS requires the approval of the SACOG Board of Directors. Final action on the plan is calendared to be taken at the Board's April 19, 2012, 9:30 a.m. meeting.

Pursuant to the California Environmental Quality Act (CEQA), SACOG has prepared a Final Environmental Impact Report (Final EIR) that contains all comments received during the public comment period on the Draft EIR, provides responses to comments on the Draft EIR, and identifies revisions to the Draft EIR, as necessary, in response to

Auburn
Citrus Heights
Colfax
Davis
El Dorado County
Elk Grove
Folsom
Galt
Isleton
Lincoln
Live Oak
Loomis
Marysville
Placer County
Placerville
Rancho Cordova
Rocklin
Roseville
Sacramento
Sacramento County
Sutter County
West Sacramento
Wheatland
Winters
Woodland
Yolo County
Yuba City
Yuba County

comments or to amplify and clarify material in the Draft EIR. The Final EIR, together with the Draft EIR for the MTP/SCS, which is incorporated by reference, constitute the EIR for the proposed MTP/SCS.

The Final Environmental Impact Report is now available for public review.

The document is available for review at SACOG at 1415 L Street, 3rd Floor, Sacramento, CA 95814. It is available in hard copy and in electronic format (CD ROM) and on the SACOG website at www.sacog.org/2035/2012/02/final-environmental-impact-report. Please contact A.J. Tendick at SACOG at (916) 340-6215 or atendick@sacog.org should you wish to view. For more information about the project, please contact SACOG at 916-321-9000 or contact@sacog.org.

Opportunities for further public involvement in the MTP/SCS and EIR.

The MTP/SCS and Final EIR will be presented as an information item at the following SACOG meetings:

- March 1, 2012, 10 a.m., Transportation Committee meeting;
- March 1, 2012, 1 p.m., Land Use & Air Quality Committee meeting;
- March 5, 2012, 10 a.m., Government Relations & Public Affairs Committee meeting;
- April 5, 2012, 1 p.m., Land Use & Air Quality Committee meeting;
- April 9, 2012, 10 a.m., Government Relations & Public Affairs Committee meeting.

The MTP/SCS and Final EIR will be presented and final action requested at the following SACOG meetings:

- April 5, 2012, 10 a.m., Transportation Committee meeting;
- April 19, 2012, 9:30 a.m., Board of Directors meeting.

The public will have the opportunity to speak on the item at all of these meetings.

All meetings are held at SACOG, 1415 L Street, 3rd Floor, Sacramento, CA 95814. For further information about the meetings, please visit sacog.org/calendar or call (916) 321-9000.

If you are a person with a disability who requires a modification or accommodation, including auxiliary aids or services, in order to participate in a public meeting, you should contact SACOG by phone at 916-321-9000, e-mail (contact@sacog.org), or in person as soon as possible and preferably at least 24 hours prior to the meeting.

TABLE OF CONTENTS

CHAPTERS:

Chapter 1 – Introduction	1-1
Chapter 2 – List of Commenters	2-1
Chapter 3 – Comments and Responses to Comments	3-1
Master Response A – Transit	3-3
Master Response B – Health.....	3-4
Master Response C – Safety.....	3-6
Master Response D – Equity	3-7
Master Response E – Priorities and Financial Analysis.....	3-9
Master Response F – Complete Streets.....	3-10
Letter #1, Private Citizen, Richard Boylan, Ph.D.	3-13
Letter #2, Private Citizen, Kerry Wicker.....	3-15
Letter #3, Private Citizen, Stanley Price	3-17
Letter #4, Yuba County, Roger Abe.....	3-20
Letter #5, Placer County, Rebecca Taber	3-28
Letter #6, Private Citizen, Michael Monasky.....	3-30
Letter #7, Sacramento Regional Transit, Rosemary Covington.....	3-33
Letter #8, Private Citizen, Michael Monasky.....	3-40
Letter #9, United Auburn Indian Community of the Auburn Rancheria, David Keyser	3-44
Letter #10, Breath California, Kori Titus.....	3-55
Letter #11, Taylor & Wiley on behalf of StoneBridge Properties, LLC, James Wiley	3-57
Letter #12, Davis Bicycles!, Mont Hubbard.....	3-60
Letter #13, Taylor & Wiley on behalf of Tsakopoulos Investments, James Wiley	3-64
Letter #14, Region Builders, Joshua Wood	3-67
Letter #15, Wilson Farms and Vineyards, Mark Wilson.....	3-88
Letter #16, Sacramento Area Bicycle Advocates (SABA), Tricia Hedahl.....	3-92
Letter #17, Environmental Council of Sacramento (ECOS), Jonathan Ellison	3-104
Letter #18, North State BIA, Dennis Rogers.....	3-113
Letter #19, WALKSacramento, Chris Holm	3-117
Chapter 4 – Revisions to Draft Environmental Impact Report	4-1
Chapter 5 – List of Preparers	5-1

TABLES:

Table 2.15. Table of Illustrative Projects..... 4-1
Table 5.2, Existing Air Quality Monitoring Sites 4-6
Table 5.3, Number of Days per Year Ozone Levels
Exceeded State 8-Hour Standard 4-7
Table 5.4, Number of Days Above National 8-Hour Standard
for Ozone 4-8
Table 5.5, Number of Days Above National 8-Hour Standard for PM_{2.5} 4-9
Table 5.6, Estimated Number of Days Above the State 24-Hour
Standard for PM₁₀ 4-10
Table 5.7, Estimated Number of Days Above the National 24-Hour
Standard for PM₁₀ 4-11
Table 7.2, Historic Districts Located in the MTP/SCS Plan Area 4-14
Table 11.5, Proposed MTP/SCS Transportation Projections with
Structures in a Floodplain 4-17
Table 11.6, Proposed MPT/SCS Transportation Projects Crossing
Impaired Bodies of Water 4-19

FIGURES:

Figure 2.4, 2008 Transit Network 4-3
Figure 2.5, 2035 Transit Network 4-4
Figure 6.1, General Land Cover in Plan Area..... 4-13
Figure 11.3. 100-Year and 200-Year Flood Plains 4-16

CHAPTER 1 - INTRODUCTION

PURPOSE OF THIS FINAL EIR

This document has been prepared to respond to comments on the Draft Environmental Impact Report (Draft EIR – State Clearinghouse No. 2001012081) prepared for the Draft Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 (Draft MTP/SCS). Pursuant to the California Environmental Quality Act (CEQA), the Draft EIR analyzes the potential adverse environmental impacts associated with implementation of the Draft MTP/SCS and recommends mitigation measures to reduce potentially significant impacts. SACOG updates the MTP/SCS every four years, or more frequently, in order to plan for the long-range transportation needs of the region and ensure that the region remains eligible to receive federal and state transportation dollars for public transit, street/road, bicycle and pedestrian improvements. This FEIR contains all comments received during the public review period on the Draft EIR for the Draft MTP/SCS, provides responses to comments on the Draft EIR, and identifies revisions to the Draft EIR, as necessary, in response to comments or to amplify and clarify material in the Draft EIR. These changes do not alter the conclusions of the Draft EIR.

This Final EIR has been prepared by SACOG pursuant to CEQA and the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and together with the Draft EIR, constitutes the EIR for the proposed project.

SUMMARY OF THE PROPOSED PROJECT

The plan area for the proposed MTP/SCS includes the counties of El Dorado, Placer, Sacramento, Sutter, Yolo and Yuba counties, exclusive of the Tahoe Basin. The plan area encompasses 3,863,373 acres (6,037 square miles) and contains 721,872 acres of developed land (as of 2008). To accommodate a projected increase of approximately 871,000 people, 303,000 new housing units and 361,000 new employees in the region through the year 2035, the proposed MTP/SCS projects the development of an additional 53,266 acres of land.

The proposed MTP/SCS includes a set of capital and operational improvements to the regional transportation system including road, bicycle, pedestrian, and transit projects. The plan also includes maintenance and rehabilitation activities to preserve the existing and expanded transportation system through 2035. Funding to support the transportation investments in the proposed MTP/SCS comes from a number of federal, state and local sources, each with specific purposes and restrictions. In total, SACOG forecasts \$35.2 billion in revenues (\$49.8 billion escalated) over the planning period. The transportation projects contained in the proposed MTP/SCS are matched to the available revenues for the planning period.

The project requires a conformity determination under the federal Clean Air Act section 176(c), to be made by the Federal Highway Administration and the Federal Transit Administration. This conformity determination involves a consultation process involving the MPO, state and local air quality planning agencies, state and local transportation agencies, the U.S. Environmental Protection Agency, and the U.S. Department of Transportation. Other public agencies may use

this EIR in their decision-making regarding future land use and transportation projects, as described in Chapter 2, Project Description, of the Draft EIR. These agencies include local governments within the plan area, state agencies, regional transportation planning agencies within the plan area, public transit providers, air districts, Native American tribes, colleges and university transportation providers and transportation management associations, among others.

ENVIRONMENTAL REVIEW PROCESS

SACOG used several methods to solicit public input on the project and environmental analysis. These methods included the distribution of a Notice of Preparation on December 13, 2010 and again on January 31, 2011; a scoping meeting on February 2, 2011; filing of a Notice of Completion (NOC) and copies of the Draft EIR with the State Clearinghouse on November 18, 2011; circulation of a Notice of Availability of the Draft EIR on November 21, 2011; distribution of the Draft EIR for a comment period of November 21, 2011 through January 9, 2012; four public hearings to receive both oral and written comments on the Draft EIR (December 6, 2011 at the Roseville Civic Center, December 8, 2011 at the Woodland Community Center, December 14, 2011 at the Folsom Community Center, and January 4, 2012 at the SACOG offices); and a release of this FEIR on February 23, 2012 to be followed by subsequent project meetings and hearings.

The Draft EIR was distributed to various public agencies, responsible agencies and interested organizations and individuals. Copies of the document were made available at the SACOG office and at all of the public county libraries in the six-county SACOG region. The public was notified of the availability of the Draft EIR through SACOG's website (www.sacog.org). Electronic copies of the documents were also made available on SACOG's website. The report was made available for public review and comment for a total 49-day period. The agency review period established by the State Clearinghouse commenced on November 21, 2011 and expired on January 9, 2012.

CONTENTS OF THIS FINAL EIR

CEQA requires that a Final EIR consist of revisions to the Draft EIR; comments and recommendations received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; and the responses of the lead agency to significant environmental points raised in the review and consultation process. The content and format of this Final EIR were developed to meet the requirements of CEQA and the State CEQA Guidelines.

This Final EIR meets the requirements of CEQA and the State CEQA Guidelines as follows:

- Chapter 1, "Introduction," provides a summary of the proposed project and gives an overview of the EIR process.
- Chapter 2, "List of Commenters," includes a list of all commenters who submitted written or oral comments during the review period.
- Chapter 3, "Comments and Responses on the Draft EIR," explains the method used to respond to comments, provides master responses to common concerns, includes written

and oral comments of all agencies, organizations, and individuals commenting on the Draft EIR, and provides responses to all comments received.

- Chapter 4, “Revisions to the Draft EIR,” includes excerpts from the Draft EIR showing revisions or changes to the original document text.
- Chapter 5, “List of Preparers,” lists the people responsible for preparing this Final EIR.

CHAPTER 2 – LIST OF COMMENTERS

The list that follows identifies all comment letters received on the MTP/SCS Draft EIR. Each letter is numbered, and the author, agency and date received are provided.

1- Private Citizen, Richard Boylan, Ph.D.	12/6/2011
2- Private Citizen, Kerry Wicker	12/6/2011
3- Private Citizen, Stanley Price	12/14/2011
4- Yuba County, Roger Abe	1/4/2012
5- Placer County, Rebecca Taber	1/4/2012
6- Private Citizen, Michael Monasky	1/4/2012
7- Sacramento Regional Transit, Rosemary Covington	1/9/2012
8- Private Citizen, Michael Monasky	1/9/2012
9- United Auburn Indian Community of the Auburn Rancheria, David Keyser	1/9/2012
10- Breath California, Kori Titus	1/9/2012
11- Taylor & Wiley on behalf of StoneBridge Properties, LLC, James Wiley	1/9/2012
12- Davis Bicycles!, Mont Hubbard	1/9/2012
13- Taylor & Wiley on behalf of Tsakopoulos Investments, James Wiley	1/9/2012
14- Region Builders, Joshua Wood	1/9/2012
15- Wilson Farms and Vineyards, Mark Wilson	1/9/2012
16- Sacramento Area Bicycle Advocates (SABA), Tricia Hedahl	1/9/2012
17- Environmental Council of Sacramento (ECOS), Jonathan Ellison	1/9/2012
18- North State BIA, Dennis Rogers	1/9/2012
19- WALKS Sacramento, Chris Holm	1/9/2012

CHAPTER 3 – COMMENTS AND RESPONSES TO COMMENTS

Written responses to each comment letter received on the Draft EIR are provided in this chapter. All letters received during the public review period on the Draft EIR are provided in their entirety. Each letter is immediately followed by responses keyed to the specific comments. The letters are listed in the order that they were received. SACOG conducted four public hearings around the region to receive oral comments on the Draft EIR. The hearing dates were as follows: December 6, 2011, in Roseville; December 8, 2011, in Woodland; December 14, 2011, in Folsom; and January 4, 2012, in Sacramento. Summaries of oral comments on the Draft EIR are included in this chapter as letters 3 and 6.

If the subject matter of one letter overlaps that of another letter, the reader may be referred to more than one group of comments and responses in order to review all information on a given subject. Where this occurs, cross-references are provided. The section titled “Master Responses,” below, presents responses which are generally more extensive than the individual responses provided in the section titled “Individual Responses,” and may cover several related issues raised by a variety of authors.

Master Response A: Transit

The Environmental Impact Report (EIR) for the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) analyzes transit service and impacts at the regional level. Requests for specific transit routes can be submitted through SACOG's Unmet Transit Needs Process. However, SACOG has forwarded a copy of all route-specific comments to the responsible transit agency.

The California State Transportation Development Act (TDA) requires the Unmet Transit Needs Process be conducted annually by Regional Transportation Planning Agencies. SACOG is the Regional Transportation Planning Agency for the counties of Sacramento, Yuba, Sutter, and Yolo. The El Dorado County Transportation Commission (EDCTC) and Placer County Transportation Planning Agency (PCTPA) conduct the unmet needs process in Placer and El Dorado counties. The MTP/SCS is consistent with TDA requirements which require SACOG, EDCTC, and PCTPA to make determinations on whether there are "unmet transit needs that are reasonable to meet" in the jurisdictions throughout the region. If there are unmet transit needs which are reasonable to meet, the jurisdiction within which a particular need falls would have to fund or implement that service before any state sales tax proceeds can be used for road purposes in that jurisdiction. For more information on SACOG's Unmet Transit Needs Process, please visit www.sacog.org/transit/unmet.cfm or email Barbara VaughanBechtold at transit_needs@sacog.org.

Policies 19 and 20 in Chapter 6 – Policies and Supportive Strategies focus on ensuring that SACOG will continue to work with transit operators throughout the region to coordinate existing and expanded transit services to facilitate an efficient and integrated regional transit system. Furthermore, the Connect Transit Card project currently underway at SACOG is a regional, electronic transit fare payment system that will allow seamless transfers between transit systems. The project is a joint effort between six different transit operators in the region (Sacramento Regional Transit District, Yolo County Transportation District, Yuba-Sutter Transit, Elk Grove Transit, El Dorado Transit, and Folsom Stage Line) and SACOG. Other transit operators in the region have the opportunity to join the Connect Transit Card system at any point. SACOG anticipates the Connect Transit Card will be available on the six transit systems by fall of 2013.

Master Response B: Health

For the last several years, SACOG has worked to expand its modeling and performance measures related to public health. In 2007, SACOG partnered with King County, Washington and their consultant on a pilot study of using I-PLACE³S to model the effects of urban form on physical activity, body mass index, and air emissions exposure/risk.¹ SACOG then applied for grants to fund the data collection, programming, and testing necessary to expand and apply that model in the Sacramento region. One application for a Center for Disease Control and Prevention grant, submitted in partnership with Sacramento County, was not funded. SACOG included this work in its application for a HUD Regional Sustainability Challenge Grant, but the award was not large enough to include this component in the work plan. SACOG recently submitted the concept of a public health module for I-PLACE³S to Caltrans for potential State Planning and Research funds, but Caltrans is pursuing other concepts.

We agree that it is important to include public health representatives in outreach and educational efforts and in providing input into SACOG's MTP/SCS modeling and development process. We have invited public health representatives to participate in focus groups and in the Equity, Housing, and Health Working Group we have convened through our HUD regional challenge grant. These groups helped us expand the performance measures used for analysis in this MTP/SCS. We will continue to reach out to public health interests for our planning efforts and hope that our stakeholders will help us to do so as well.

SACOG recently submitted an application for a Strategic Growth Council Planning Grant to help build on our work on this MTP/SCS. Major components of the project seek to expand SACOG's capacity to address public health. One effort would convene stakeholders, including public health experts, local governments, air districts, and advocates, to refine a set of public health metrics for use in development, implementation, and monitoring of the MTP/SCS and other regional and local planning efforts, as well as to identify data and methodological challenges and next steps.

The project would also include addressing the emerging tensions between infill development and public health concerns regarding residents' exposure to toxic air contaminants. SACOG would work with air quality, public health, and infill experts to review the current science and literature on the health impacts and benefits of infill and transit-oriented development, review ARB and local air district guidance and best practices for healthy development and mitigations, and seek to facilitate agreement on more regional guidance for siting residential uses, including homes affordable to lower income populations, in order to maximize health benefits and minimize health risks. This could include reviewing commenter-suggested resources from MTC, Human Impact Partners, and SFDPH's modeling.

In addition, the project would include a complete streets component. This work would include an analysis of emerging tools – such as NCHRP Multimodal Level of Service Analysis for Urban Streets, pedestrian and bicycle indices, connectivity measures, intersection safety models, etc. –

¹ Report at:

<http://your.kingcounty.gov/kcdot/planning/ortp/HealthScape/I-PLACE3S-FINALREPORT%2006-01-09.pdf>

for assessing how supportive current or proposed street designs and corridors are of multimodal travel, physical activity, and safety. SACOG would assess and share with planners, public works directors, and advocates those tools that are most applicable and feasible to use in assessing, planning, and prioritizing complete street efforts.

In addition to the grants already being pursued, SACOG will continue to identify new grant and partnership opportunities that would allow for continued study and implementation of tools and models related to the intersection of land use planning, transportation planning, and public health. SACOG thanks the commenters for their enthusiastic participation in the planning process and looks forward to continued engagement.

Master Response C: Safety

A number of commenters requested SACOG incorporate safety as a primary performance metric in the MTP/SCS. SACOG monitors collisions and collision rates, and will be working with its planning partners to identify a suitable approach to reducing collisions and collision rates which could be implemented for the next update of the MTP/SCS. In monitoring activities, SACOG tracks state collision records and documents collision trends over time (see the “Regional Transportation Monitoring Report” published by SACOG in 2010). Collision data for the monitoring program come from the Statewide Integrated Traffic Records System (SWITRS), an online collision records database maintained by the California Highway Patrol. An update of SACOG’s Monitoring Report is currently underway, and SACOG is considering new ways to summarize and display the incident information provided by the SWITRS database to make it more accessible to the general public.

SACOG does not currently have the capability to forecast collisions in anything other than a simplistic way, such as by simply projecting collisions by a combination of population and VMT growth, without any accounting for enhanced design features of new transportation projects, nor the effect of projects or programs intended to address safety concerns. Software intended to provide this capability (PlanSafe) was tested by SACOG as part of preparatory work for the MTP/SCS, but the software was too limited to be of use. SACOG will continue working with its planning partners and stakeholders to identify both a suitable approach (including software applications) for forecasting collisions and the additional project information that would be required from project sponsors to support a forecast of collisions and collision rates.

Commenters also requested that SACOG include a discreet expenditure category for safety projects. In general, the budget categories in the MTP/SCS are a means of classifying the primary feature of an investment. As a result, many safety improvements are frequently included as components of a larger project and are difficult to isolate. Overall system safety is improved through a wide range of road, transit and bicycle and pedestrian investments that include features such as adding bike lanes, sidewalks, rumble strips, and various intersection safety investments.

The MTP/SCS does include policies and strategies to help ensure safety, complete streets, and public health are considered as part of implementing the plan (see Policies 2, 3, 8, 14, 17, 20, 29, and 30). However, how individual projects handle these things specifically is typically analyzed at the project level, by the lead agency during the design and environmental review processes. Chapter 10- Financial Stewardship contains a more detailed discussion of how safety is addressed in the MTP/SCS.

Master Response D: Equity

In response to comments pertaining to SACOG's development and application of the jobs-housing fit tool, as noted in the draft MTP/SCS, SACOG is in the process of developing a jobs-housing fit tool and analyzing housing plus transportation costs in the Sacramento region through funding from a HUD Regional Sustainability Challenge Grant. The purpose is to assess how the cost of housing compares to local wages and to analyze the combined impact of the cost of housing and transportation in areas throughout the region. In 2011, SACOG met with a statewide group on jobs-housing fit organized by Public Advocates and Housing California, shared a potential methodology for analyzing jobs-housing fit, and discussed the complexity of developing a tool because of data issues. SACOG also discussed methodological approaches and data limitations with the UC Davis Center for Regional Change. SACOG staff is now compiling and cleaning wage and housing cost data, and is assessing new Census data for usability and margins of error. In 2012, SACOG will continue to work on developing the jobs-housing fit tool and completing the housing plus transportation cost analysis. SACOG will also review work by peer agencies such as the Metropolitan Transportation Commission who is developing a displacement analysis methodology for the San Francisco Bay Area. SACOG staff will share progress on the tools with the SACOG Board and stakeholders. We expect completion by the end of 2012, for use in future MTP/SCS and other planning efforts.

Commenters also suggested that SACOG analyze how the MTP/SCS might affect housing prices, gentrification, and displacement of lower income residents, including in transit-rich areas. SACOG has a history of trying to better understand the impacts of the MTP and is committed to improving in future MTP/SCS updates. Within budget constraints, we expect to continue working with equity and other organizations to expand our ability to analyze and address plan impacts, and hope that groups will work with us on developing new tools. The MTP/SCS includes the likely location and product mix of housing based on the population and household growth forecast from the Center for Continuing Study of the California Economy, local land use plans and other regulatory factors, and the SACOG Blueprint. However, SACOG is unable to forecast more precisely the associated sales or rental prices of the future housing stock. Housing developers will propose specific projects based on a variety of factors that will tend to change between now and 2035, including market conditions, costs of land and construction, financing options, zoning, and subsidies available for affordable home production. Projects are also subject to approval by local Planning Commissions, City Councils, and Boards of Supervisors, whose members change over time. This makes it difficult to predict particular impacts of the MTP/SCS on housing developments or prices in particular neighborhoods over the MTP/SCS plan period, but per a commenter's suggestion, SACOG will review the UCB Early Warning toolkit for any additional tools SACOG might be able to utilize in planning for housing in the region.

Commenters also suggested that SACOG collaborate with equity organizations on developing and tracking the equity performance of the MTP/SCS. It was requested that SACOG create an Equity Scenario, or integrate a more robust analysis of equity into every scenario, in the next MTP/SCS. SACOG has been working with equity interests and other stakeholders to expand and improve the health, equity, and environmental analyses we use in developing and monitoring implementation of the MTP/SCS, and expects to continue to work with equity organizations on our planning and measurement work. This plan includes a much-improved analysis of equity issues compared to the previous MTP and exceeds SACOG's federal requirements for

considering equity impacts. However, SACOG is committed to continuing to improve how we look at equity and expanding the equity performance indicators examined in future updates to the MTP/SCS. SACOG is seeking grant funds to develop economic forecasting capacity in the PECAS model, to include factors like wages at place of work and household income at place of residence. This would expand our capacity for jobs-housing fit analysis and improve our ability to account for MTP/SCS impacts on low-wage workers and low-income households.

Commenters wanted to see funding in early years of the MTP directed to transit and transportation projects or programs that advance regional equity, with priorities for transit service for low-income communities and transit-dependent populations, better service for youth, and bicycle and pedestrian infrastructure. The estimated \$11.3 billion in revenues slated for transit will flow into the region over the course of the MTP/SCS planning period. SACOG expects that revenue levels will be higher in the later years of the plan than in the earlier years, which explains the greater expansion of transit services between 2020 and 2035 and the inability to front-load transit funding. See Master Response E: Priorities and Financial Analysis for a more thorough response regarding front-loading bike/pedestrian expenditures. SACOG continues to work with the region's transit providers to increase mobility and service for low-income and transit-dependent populations by, among other things, helping transit agencies update their Short-Range Transit Plans, collaborating on other transit studies, and providing technical assistance.

Master Response E: Priorities and Financial Analysis

Implementation of the MTP/SCS is carried out gradually through shorter-term decisions that assign local, state or federal funds to specific projects through periodic funding or programming cycles. The schedule was completed to meet the following objectives:

- **Balance revenues and expenditures over the 25-year planning period** – Projects must be scheduled to match the pace at which revenues are available to pay for them, which limits the number of projects that can be planned for any given year and forces decisions about relative priority. This test is called financial constraint.
- **Support attainment of air quality standards** – The MTP must be analyzed as an overall package via a computer model to verify that its implementation would meet federal air quality requirements in the region’s Rate of Progress State Implementation Plan, and the sequence in which projects are scheduled could make a difference in that analysis. This test is called air quality conformity.

As Caltrans, cities, counties, or other local agencies implement projects contained in the MTP/SCS the project must be consistent with the Plan if they want to be eligible to use federal or state funding. SACOG will amend its MTP/SCS from time to time, and, when it does, it must verify both financial constraint and air quality conformity.

The MTP/SCS directs a significant portion of funding towards bicycle, pedestrian and transit improvements. Bicycle and pedestrian investments increase significantly from the 2008 base year level and have the highest per-capita funding increase in the MTP/SCS, as compared to the prior plan. Transit investments also increase significantly from the 2008 base year and result in even higher productivity gains as the plan’s investments and policies emphasize service along corridors with supportive land uses. The combination of increased investment levels and a focus on more productive transit routes results in a transit network in 2035 with 45% of all routes at frequencies of 15 minutes or greater, as compared to 15% of all routes with 15 minute frequencies in the 2008 base year.

The bicycle, pedestrian, and transit investments in the MTP/SCS are dependent upon the availability of federal, state, and local funding sources. Local funding sources provide more than two-thirds of the total funding for the plan’s investments, while funds from the state or regional sources managed by SACOG represent the other one-third. Local funding sources have declined significantly over the last several years and it is anticipated that it will not be until nearly 2020 that many local revenue sources will fully recover to pre-recession levels. As growth returns to the region, however, local funding sources are anticipated to increase significantly out to the horizon year of 2035.

Recognizing the challenge of near-term local funding constraints, SACOG’s regional funding programs have offered important near-term investments to realize transit, bicycle and pedestrian projects. This commitment is most recently reflected in 2012 programming actions by the SACOG Board in which 69% of the total (\$103m) was directed to projects that primarily support transit, bicycle or pedestrian travel through direct investment or through supportive programs that include air quality and travel demand management investments.

Master Response F: Complete Streets

Over the last few years, SACOG has significantly increased efforts to promote and implement complete streets in the Sacramento region. A notable achievement has been a policy change in SACOG's regional funding program that now includes complete streets features as criteria for any road rehabilitation project SACOG funds. Other recent achievements include the completion of a Complete Streets Toolkit and enhanced 511 traveler information that now includes an online bicycle trip planner and a multilingual video on how to safely bike, walk, and use transit in the region. Education on the benefits to complete streets now occurs regularly through SACOG's regional Bicycle & Pedestrian Advisory and expanded May is Bike Month campaign activities.

In addition to efforts to promote complete streets at a regional scale, SACOG also offers technical assistance and support to local agencies working to implement complete streets. These efforts include collaborating on grant applications, and technical assistance on bicycle or pedestrian master plans that allow local agencies to become eligible or compete more effectively for competitive grants. In a time of serious budget cuts and staffing limitations, a focus on helping local agencies and stakeholders receive more funding to implement complete streets projects is an important MTP/SCS implementation activity.

Despite resource constraints, SACOG remains committed to help realize the long-term vision of a more comprehensive regional complete streets network. Greater system connectivity has important benefits and SACOG intends to continue working with agency and advocate partners on the various efforts this will involve. The MTP/SCS represents an important step towards this goal through the extensive technical analysis completed, numerous policies and strategies supporting the implementation of complete streets (Strategies 3.2, 3.6, 17.5, 29.1, 29.2, 29.3, and 29.4) and the recommended MTP/SCS funding support level. Over the course of the planning period out to 2035, proposed bicycle and pedestrian funding levels increase significantly from the 2008 base year and represent a higher share of total plan investments than other large regions in California. A funding commitment to bicycle and pedestrian investments is also evident when comparing the MTP/SCS to the prior plan. Despite a 5% per-capita decrease in the overall budget, as compared to the prior plan, the MTP/SCS calls for increasing bicycle and pedestrian investment in the region by 7% per-capita through 2035.

SACOG looks forward to working with local agencies and stakeholders to identify innovative, collaborative, and feasible approaches to creating complete streets and corridors within the region. Among the challenges to continue addressing is that there is no agreed-upon methodology for identifying and prioritizing projects across the region which would facilitate the creation of a comprehensive bicycle/pedestrian network. The region is very diverse and the definition of what comprises a complete street or corridor varies considerably in urban, suburban, small community and rural portions of the region. For example, some local plans call for investing in bike lanes on major arterials as the most effective means to improve connectivity, whereas some stakeholders, recommend investing in bikeways on streets with low traffic volumes and speeds. The energy and knowledge complete street advocates bring to these issues will be important inputs if we are to realize this vision. One upcoming opportunity for collaboration on these issues is the regional bicycle and pedestrian investment policies advisory

group SACOG is launching to help guide the 2013 update of the Regional Bicycle, Pedestrian, and Trails Master Plan.

Additional complete streets implementation efforts in the near-term may be possible through grant funds being sought through the Strategic Growth Council (SGC) to enhance SACOG's work with jurisdictions and advocates on complete street priorities and funding. Securing grant funding would facilitate work such as assessing available methodologies and determining which tools are most applicable and feasible for SACOG and local communities to use in planning, prioritizing, and analyzing complete street efforts and projecting resulting mode shifts. A variety of tools are emerging for assessing how supportive current or proposed street designs and corridors are of pedestrian and bicycle travel (e.g., I-THIM, Multimodal Level of Service, pedestrian and bicycle indices, connectivity measures, intersection safety models, WalkScore, etc.). More information about the many different aspects to understanding, developing, and implementing complete streets would also be funded. SACOG's Complete Streets Resource Toolkit is part of SACOG's complete streets technical assistance program, and is continually maintained and updated. The toolkit is available online at <http://www.sacog.org/complete-streets/toolkit/START.html>.

In regards to recommendations for more safety and health outcomes from complete streets, SACOG is involved in multiple efforts that are described in detail in Master Responses B and C. In summary, safety performance outcomes are reflected in state collision records and documents trends that SACOG is tracking through the "Regional Transportation Monitoring Report" first published by SACOG in 2010, with an update of this report currently underway. SACOG is also continuing to seek a reliable approach for forecasting collisions and assessing policies that affect the number and severity of collisions. As for health outcomes, SACOG's recently submitted grant proposal to the Strategic Growth Council includes working with stakeholders to refine a set of performance metrics for walking, biking and public health outcomes.

Whether it is safety, health or other important performance outcomes, SACOG has a history of trying to better understand the impacts of the investments in the long range plan and is committed to the ongoing improvement of the MTP/SCS. Within budget constraints over the next few years, SACOG expects to continue working with our planning partners and other interested parties to expand our ability to analyze and address plan impacts, and hope that groups will work with us on efforts to accelerate the implementation of complete streets across the region.

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eircomments sacog - wholly inadequate and invalid EIR

From: "drboylan" <drboylan@sbcglobal.net>
To: <eircomments@sacog.org>
Date: 12/6/2011 2:31 PM
Subject: wholly inadequate and invalid EIR

SACOG,

- 1-1 That draft EIR you sent out for SACOG's Draft Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 is wholly inadequate and constitutes an *invalid* EIR. Any attempt to go forward under such a superficial, shoddy and flawed EIR is thus against the law.
- 1-2 To mention one key flaw (of many), the assumption that Residential Mixed Use is exempt from analysis of its impact on land use, environmental degradation, disruption of community identity, and cumulative growth-inducing impact is a critically-flawed assumption and *invalidates* the *entire* document.
- Regardless of whatever tortured reading of SB 375 may be done by the developers who control SACOG, the "Residential Mixed Use" (with business) category is being used to foist high-density large subdivisions on unwilling small rural communities.
- 1-3 A democracy yields to the will of the people. It is time SACOG did so.
 That EIR needs to be *completely re-done* by a competent environmental group independent of Big Developers influence.

Richard Boylan, Ph.D.
 Diamond Springs, CA (El Dorado County)

RESPONSE TO LETTER 1 – Richard Boylan, Ph.D.

- 1-1.** This introductory comment is noted. SACOG does not agree with the commenter’s opinion regarding the adequacy of the document. The Draft EIR has been carefully prepared to accurately and comprehensively address the potential for implementation of the MTP/SCS to result in significant adverse environmental impacts, and to be fully compliant with the requirements of CEQA.
- 1-2.** The DEIR must analyze the entire land use pattern of the MTP/SCS, which includes residential mixed use development as well as employment and residential uses of varying densities forecasted to occur throughout the plan area during the planning period of the MTP/SCS. All potential impacts are analyzed, including the examples cited in this comment (land use in Chapter 12, disruption of community identity/character in Chapter 3, cumulative and growth inducing impacts in Chapter 19, and other environmental degradation in these and the other chapters of the document.)
- Staff assumes this comment may also refer to the summary of SB 375 CEQA benefits for residential mixed use projects provided in Chapter 2 – Project Description (pages 2-57 to 2-60). Pursuant to SB 375, project-level environmental review of qualifying residential mixed use projects determined to be consistent with the general use, density and building intensities of the MTP/SCS may omit analysis of regional transportation impacts, passenger vehicle greenhouse gas impacts, and growth inducing impacts. However, all other potential impacts of the qualifying project must undergo CEQA review.
- 1-3.** This concluding comment is noted. SACOG does not share the opinion that the document should be rewritten. Please see response to comment 1-1.

eircomments sacog - Comment on the Draft MTP/SCS and EIR from

From: MTP Comments <osugmukaw@gmail.com>
To: <eircomments@sacog.org>
Date: 12/6/2011 8:00 AM
Subject: Comment on the Draft MTP/SCS and EIR from

What are you commenting on?

- Metropolitan Transportation Plan/Sustainable Communities Strategy
- Environmental Impact Report

Name

Kerry Wicker

Email

osugmukaw@gmail.com

Do you want a written response?

Yes

Address

Comments on the MTP/SCS

- 2-1 | Please include in both documents an immediate plan to add transit in Yolo County that connects Route 215 in Madison and/or Esparto, with Winters and Vacaville (to hook up to Solano transit). Service to/from Winters/Esparto could start for just Friday and Saturday nights to take advantage of entertainment in Winters that might include an adult beverage. Avoids DUI.
- 2-2 | Also, please fill the service gaps of YoloBus #215 to allow workers to fully commute from Western Yolo County. As is, it is not possible to stay at work a full day b/c of the 4+ hour gap in service.
- 2-3 | Please please please put in a bicycle lane (better yet, path) right away along Hwy 16 from Esparto to Woodland. Also, continuing the bike lane up the Canyon from Esparto is hugely beneficial as well. I usually ride on any roadway, but there are too many drunks/irresponsible drivers to brave the highway. The CalTrans Hwy 16 project is still in litigation, but whatever comes out should be the bike lane/trail.
- All these actions will reduce carbon emissions, improve public health, accessibility, water and other air quality.
- Let me know when you plan to add these services/infrastructure.

RESPONSE TO LETTER 2 – Kerry Wicker

- 2-1.** The Environmental Impact Report (EIR) for the Metropolitan Transportation Plan / Sustainable Communities Strategy (MTP/SCS) analyzes transit service and impacts at the regional level. Requests for specific transit routes in Yolo County can be submitted through SACOG’s Unmet Transit Needs Process. SACOG has forwarded a copy of this comment to the Yolo County Transportation District (YCTD) responsible for transit planning and operations in Yolo County. For more information on SACOG’s Unmet Transit Needs Process, please visit www.sacog.org/transit/unmet.cfm or email Barbara VaughanBechtold at transit_needs@sacog.org.
- 2-2.** See response to comment 2-1.
- 2-3.** While bike lanes on Highway 16 are not specifically called out as projects in the EIR, the budget assumptions for the MTP/SCS include roughly \$2.4 billion for implementation of the Regional Bicycle, Pedestrian, and Trails Master Plan (Master Plan) and other bicycle and pedestrian improvements. The Master Plan incorporates the projects from the Yolo County Bicycle Transportation Plan, City of Davis Bicycle Plan, and the Woodland Bicycle Transportation Plan. Specifically, the Yolo County plan includes Class II bicycle facilities along Highway 16 from Esparto to the county line. For more information about how bicycle and pedestrian projects are included in the regional and local bicycle and pedestrian master plans, please visit <http://www.sacog.org/bikeinfo/bikeped.cfm> or contact Lacey Symons-Holtzen at lsymons-holtzen@sacog.org.

Folsom Public Hearing Comments from December 14, 2011

Stanley Price	3-1	MTP modeling should include collision projections based on past data.
	3-2	The EIR should address public health issues related to bicycle and pedestrian travel, including safety concerns and the economic and health benefits realized from incorporating active transportation into everyday life.
	3-3	The definition of "high quality transit" is restrictive. Commuter service, which typically does not run every 15 minutes, is productive and serves an important role.

The comments here are summaries of the oral testimonies provided at this public hearing.

RESPONSE TO COMMENT 3 – Stanley Price

- 3-1.** Over time, SACOG has increased both its monitoring and forecasting efforts with regard to safety, including bicycle and pedestrian safety. In monitoring activities, SACOG tracks state collision records and documents trends (see the “Regional Transportation Monitoring Report” published by SACOG in 2010). An update of this report is under way now, and some of the suggestions for tabulations of collisions will be considered for the update, based on the availability of SWITRS data.

SACOG does not currently have the capability to forecast collisions in anything other than a simplistic way (e.g. by simply projecting collisions by a combination of population and VMT growth, without any accounting for enhanced design features of new transportation projects, nor the effect of programs intended to address safety concerns). SACOG monitors collisions and collision rates, and will be working with its planning partners to identify a suitable approach to reducing collisions and collision rates which could be implemented for the next update of the MTP/SCS. With regard to using past data to project collisions, since 2002, SWITRS data indicate that rates of total collisions have declined slightly. The reasons for the decline are not known, but may include: improved vehicle safety features; for some roadways, improvements to geometric design; and implementation of safety education programs. After several years of decline, per capita rates of bicycle-involved collisions increased in 2006, 2007 and 2008. Again, the reasons for this increase are not known, but increased exposure (i.e. cyclists sharing facilities with automobiles at higher rates) may be one factor. Projecting these rates into the future without specifically accounting for causes of accidents and specific elements of projects or programs included in the MTP/SCS aimed at addressing them is speculative. However, if increased exposure accounts for the recent increases in rates of bicycle-involved collisions, construction of more Class I facilities included in the MTP/SCS could reduce some of this exposure.

- 3-2.** The land use changes forecasted by the MTP/SCS, together with the transportation investments, reduce the need to travel frequently or over long distances using passenger vehicles by putting people closer to jobs and other destinations, and by increasing opportunities to bicycle, walk or ride transit. The MTP/SCS measures the benefits of these combined land use and transportation elements on bicycle and pedestrian travel to the fullest extent allowed by the data and models available to SACOG during this MTP/SCS update cycle. The policies and strategies of the MTP/SCS support the objectives of the MTP/SCS, several of which aim to improve the bicycling and pedestrian system. Some of the most relevant objectives include: supporting transportation investments that provide high performance benefits for all community types in the region, improving the condition of the existing transportation system through the maintenance of transportation corridors that can support various modes of travel, supporting transportation choice and diversity for all segments of the population through a balanced transportation system where investments in various modes complement each other and support the diversity of travel demand in various community types. The MTP/SCS demonstrates achievement of these objectives by improved connectivity of the region’s

bicycle and pedestrian systems due to greater investment in those systems, as well as the forecasted per capita increase in bicycle and pedestrian trips.

In the DEIR, health and safety issues related to bicycle and pedestrian travel are analyzed through the more traditional CEQA analyses of the air quality, transportation, noise, and hazards/hazardous materials chapters. The DEIR concludes roadway improvements in the proposed MTP/SCS will improve pedestrian and bicycle safety. SACOG agrees with the premise that economic and health benefits are derived from incorporating bicycle and pedestrian travel into everyday life, however beneficial impacts are not a focus of CEQA, and even adverse environmental effects are not considered significant impacts under CEQA unless they would result in significant adverse physical changes in the environment (CEQA Guidelines Sections 15064(e), 15064(f)(6), 15131, 15382). In the case of bicycle and pedestrian travel, the positive environmental effects of the increased travel forecasted in the plan are analyzed in the aforementioned chapters of the DEIR. In addition, please see Response 3-1.

- 3-3.** The definition of “high quality transit” in the DEIR is consistent with Public Resources Code section 21155, which defines a “high quality transit corridor” as “a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The DEIR appropriately relies on this statutory definition.

The County of Yuba

OFFICE OF THE BOARD OF SUPERVISORS



915 8th Street, Ste. 109
Marysville, California 95901
(530) 749-7510
(530) 749-7353 FAX

December 28, 2011

Attn: EIR comments: AJ Tendick
SACOG
1415 L Street, Suite 300
Sacramento, CA 95814

Sent via email: atendick@sacog.org and by first class mail

RE: **SACOG DRAFT MTP/SCS and EIR**

Dear Mr. Tendick:

Thank you for the opportunity to review the Draft 2035 MTP/SCS and related EIR. The majority of our comments relate to requesting changes to floodplain designations due to recently certified levees in Yuba County.

4-1 Pages 7-19 & 7-20 of the Draft MTP/SCS discuss flood control. The document indicates that SACOG recently updated its levee status report to determine if any potential growth areas in floodplains might be delayed due to levee conditions and the jurisdiction's ability to improve their levees to meet federal and state requirements for flood protection. The analysis then indicates that Yuba County is one of the jurisdictions where levee improvements may result in delays in growth.

Yuba County is the first urban area not only with in the SACOG region but the Central Valley to offer 200 year flood protection. "Established/Corridor Communities" such as Linda and Olivehurst as well as the "Developing Community" of Plumas Lake have reinforced levees with 200 year level of protection . In addition, FEMA certified and accredited the levee system protecting these areas during the summer of 2010.

4-2 Not only does the community of Plumas Lake have the necessary flood protection to allow for urban development, significant portions of the plan area have obtained the required planning entitlements and have approved and/or recorded maps, making this area "shovel ready" for future development.

Another significant "Developing Community" located along the Highway 65 corridor north of Wheatland does not require levee protection or additional flood protection to allow for development. Therefore we request that SACOG update this section of the Draft MTP/SCS and EIR to reflect that these portions of Yuba County will not experience growth delays due to flood control issues.

Corrections that should be made to the EIR to reflect current floodplain conditions within Yuba County are:

Pg 11-10, Figure 11.3:

4-3 This map shows the 100-yr and 200-yr floodplains. The map was created from data from 2002. The map shows the lower southwestern part of Yuba County (Linda to Plumas Lake) in a 200-yr flood plain. This is most likely due to the levees not being certified in 2002 for this level of protection. With the levee repairs previously discussed this area currently has a 200-yr level of protection. The map should reflect this since it indicates that any development in this area will occur within a floodplain.

Pg. 11-79, Table 11.5:

4-4 The Table shows that projects for Goldfields Parkway, Plumas Arboga Road and River Oaks Blvd as listed in 100-yr and 200-yr floodplains. With the completed levee work these projects should not be listed as in floodplains.

Pg. 11-93, 2nd paragraph under the Developing Communities:

4-5 This paragraph discusses jobs and housing that will be within 200-yr floodplain. The last sentence states Yuba County will add 5,926 housing units and 3,478 jobs within a 200 year flood hazard area. Any housing units or jobs located within the Pumas Lake Specific Plan area or the developing community along Highway 65 should be removed from this calculation.

Other Comments on the Draft EIR

Pg. 11-108, Table 11.6:

4-6 The table shows that the interchange at Feather River Blvd and SR 70 crosses an impaired body of water, the Bear River. This project is not crossing the Bear River and should be removed from the table.

Pg.11-31, Figure 11-6

4-7 The labels for the water bodies appear to be shifted southwest from the actual location.

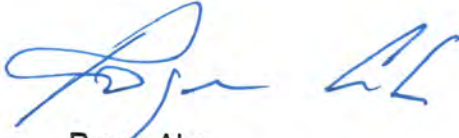
Other Comments on the Draft MTP/SCS

Appendix A page 129 of project list

4-8 The second and forth items on this page of the table are duplicate projects for the La Porte Road Bridge at New York Creek. Please delete the second item listed at \$700,000 and keep the fourth item as it encompasses the entire project.

4-9 | If you have any questions, please contact Community Development & Services Agency staff, Kevin Mallen or Wendy Hartman at (530) 749-5430.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Roger Abe', followed by a second, less legible signature.

Roger Abe
Chairman of the Board

Attachment

Three Rivers Levee Improvement Authority Press Releases Regarding Levee Accreditation



THREE RIVERS LEVEE IMPROVEMENT AUTHORITY

1114 Yuba Street, Suite 218

Marysville, CA 95901

Office (530) 749-7841 Fax (530) 749-6990

FOR IMMEDIATE RELEASE
June 1, 2010

CONTACT: Paul Brunner
(530) 749-5679

FEMA WILL ACCREDIT 29 MILES OF URBAN LEVEES IMPROVED BY TRLIA

MARYSVILLE, CA – Some very good news arrived today for residents in Linda, Arboga, Olivehurst and Plumas Lake in the form of a letter from the Federal Emergency Management Agency (FEMA). Sent to officials from the Three Rivers Levee Improvement Authority (TRLIA) and the County, the letter confirms that 29 miles of levees improved by TRLIA meet FEMA's certification criteria. As a result, FEMA will accredit the levee system as providing 100-year flood protection.

Levee accreditation by FEMA means that areas in Linda, Olivehurst, Arboga and Plumas Lake – except those affected by internal drainage issues – will not be “mapped” into a Special Flood Hazard Area when FEMA's new Flood Insurance Rate Maps take effect in February 2011. It also means that Yuba County will maintain its ability to implement its General Plan for these areas, and property owners with mortgages will not be required to purchase flood insurance.

Since 2004, more than \$405 million has been invested to improve the levees, which failed catastrophically in 1986 and 1997. Of the total project cost, approximately \$265 million was funded by the State through Early Implementation Program (EIP) and Proposition 13 funds. Funding has also been provided by the State Department of Fish & Game, Yuba County, the Yuba County Water Agency, Reclamation District 784, and local development interests.

While FEMA only certifies levees for 100-year protection, the levees have been designed to withstand a 200-year flood event. Strong levees are the first line of defense against flooding. However, FEMA, the Department of Water Resources, Yuba County and TRLIA strongly encourage property owners to consider purchasing flood insurance as additional protection for their structures and contents. Lowest-cost flood insurance is available through FEMA's National Flood Insurance Program (www.floodsmart.gov).

For more information about TRLIA's levee certification and accreditation, please contact Paul Brunner, TRLIA Executive Director, at (530) 749-5679.

###

The Three Rivers Levee Improvement Authority, a joint powers agency, was established in May 2004 by the county of Yuba and Reclamation District 784 to finance and construct levee improvements. Four work phases were identified with the goal of achieving 200-year flood protection for areas protected by Reclamation District 784 levees. www.trlia.org



THREE RIVERS LEVEE IMPROVEMENT AUTHORITY

1114 Yuba Street, Suite 218

Marysville, CA 95901

Office (530) 749-7841 Fax (530) 749-6990

FOR IMMEDIATE RELEASE

March 14, 2011

CONTACT: Paul Brunner
(530) 749-5679

TRLIA WINS AWARD FOR OUTSTANDING FLOOD MANAGEMENT

MARYSVILLE, CA – As the Three Rivers Levee Improvement Authority prepares to break ground on the final phase of its aggressive levee improvement program, it continues to garner awards for civil engineering excellence on recently completed works.

On March 9, the American Society of Civil Engineers Region 9 presented its Outstanding Flood Management award to TRIA for the Feather River Setback Levee project. Approximately six miles in length, the setback was designed and implemented to provide 200-year flood protection to more than 40,000 residents in South Yuba County, replacing a deficient levee that provided only 20-year flood protection, and opening approximately 1,600 acres of additional land for expanded floodway and ecological habitat. Regionally, the project is expected to lower water elevations by as much as 1.5 feet during significant flood events, easing pressure on both the Yuba and Feather River Levees and providing increased flood protection to South Yuba County, as well as the cities of Marysville and Yuba. Construction was completed in November 2009, and the setback and expanded floodway are now fully operational.

The ASCE Region 9 award is TRLIA's second in three years. TRLIA's Bear River Setback Levee was honored with the ASCE Region 9's Flood Control Project of the Year in 2008.

The Feather River Setback Levee is part of the Authority's \$405 million levee program to improve 29 miles of levees that protect Linda, Olivehurst, Arboga, and Plumas Lake. In April, TRLIA will break ground on the Upper Yuba Levee Improvement Project (UYLIP), the final phase of the project. TRLIA will be hosting a community meeting to discuss the project at 6:30 p.m., Wednesday, April 6, at the Yuba County Government Center, 915 8th Street, Marysville.

For more information about TRLIA's levee improvement program, visit www.trlia.org, or call the UYLIP hotline at 530-763-7912.

###

The Three Rivers Levee Improvement Authority, a joint powers agency, was established in May 2004 by the county of Yuba and Reclamation District 784 to finance and construct levee improvements in South Yuba County. Four work phases were identified with the goal of achieving 200-year flood protection for more than 40,000 residents and nearly \$1 billion in property and structures. www.trlia.org

4-11

RESPONSE TO LETTER 4 –YUBA COUNTY, Roger Abe, Chairman of the Board

- 4-1. SACOG properly relied upon the information available at the time of DEIR preparation to analyze flood protection and impacts associated with flooding. SACOG acknowledges that Yuba County recently completed levee improvements that offer 100-year flood protection and has received a Letter of Map Revision from the Federal Emergency Management Agency (FEMA). The California Department of Water Resources has not yet published a methodology that acknowledges that areas with 100-year flood protection also have 200-year flood protection. Responses to your requested changes are listed in responses 4-2 through 4-8. While SACOG cannot show that any areas have less exposure to flood hazards until new flood zone maps are published, the responses will acknowledge Yuba County’s levee improvements.
- 4-2. In response to this comment, SACOG deletes the reference to Yuba County in the fourth paragraph under the heading “Flood Control” on page 7-19 of the MTP/SCS.

In response to this comment, SACOG modifies the paragraph under the heading “Established Communities” on page 11-81 of the EIR with the following:

Like Center and Corridor Communities, Established Communities are already urbanized, but at a lower average density. Housing units will increase by approximately 79,000, but will decrease in proportional share from 77 percent to 64 percent. Established Communities in Sacramento County will add 16,599 housing units in the 200-year flood hazard area. Yolo County will add 791 housing units in the 200-year flood hazard area. Yuba County will add 1,702 housing units in the 200-year flood hazard area, although this number may be considerably lower, due to recent levee improvements in a portion of the county that are not yet available in the official state data source used for this analysis. Specifically, the communities of Linda and Olivehurst may now have 200-year level protection and as such would not experience growth delays due to flood control issues. This growth pattern is consistent with the policies of the 2008 MTP and Blueprint, which call for a more compact regional growth footprint.

In response to this comment, SACOG also modifies the paragraph under the heading “Developing Communities” on page 11-82 with the following:

Developing Communities in Sacramento County will add 5,350 housing units in the 200-year flood hazard area. Sutter County will add 3,475 housing units in the 200-year flood hazard area. Yolo County will add 954 housing units in the 200-year flood hazard area. Yuba County will add 5,926 housing units in the 200-year flood hazard area, although this number may be considerably lower, due to recent levee improvements in a portion of the county that are not yet available in the official state data source used for this analysis. Specifically, the communities of Plumas Lakes and areas north of Wheatland in the Highway 65 corridor may now have 200-year level protection and as such would not experience growth delays due to flood control issues.

These changes do not have an impact on the analysis included in the EIR and would result in fewer impacts.

- 4-3.** We recognize that Yuba County has completed levee improvements that are designed to provide 200-year level protection, but the floodplain maps available to us do not yet reflect these improvements. We also recognize that these levees have been accredited by FEMA as providing 100-year flood protection, but again, the floodplain maps available to us do not yet reflect these improvements. In response to this comment, and in order to acknowledge these levee improvements in the EIR, SACOG has added a footnote to Figure 11.3 on page 11-10 that states:

Yuba County completed levee improvements in 2011 that are designed to provide 200-year level protection in various areas of South Yuba County and have been accredited by FEMA for 100-year flood protection. However, new floodplain maps that reflect these levee improvements were not available at the time of publication of this EIR.

This change does not have an impact on the analysis included in the EIR and would result in fewer impacts.

- 4-4.** Recommended changes accepted. In response to this comment, SACOG deletes Goldfields Parkway, Plumas Arboga Road and River Oaks Blvd from Table 11.5 on page 11-79. This change does not have an impact on the analysis included in the EIR and would result in fewer impacts.

- 4-5.** As stated in response 4-3, we acknowledge that Yuba County now levees designed to provide 200-year level protection, but the floodplain map available to us does not reflect these improvements (see Response 4-3). In response to this comment, SACOG has modified the last sentence in the second paragraph under the heading Developing Communities on page 11-93 to read:

Yuba County will add a maximum of 5,926 housing units and 3,478 jobs in a 200 year flood hazard area. Recent levee improvements in southern Yuba County are designed to provide 200-year flood protection and may result in less or no exposure to flood hazards.

This change does not have an impact on the analysis included in the EIR and would result in fewer impacts.

- 4-6.** Recommended changes accepted. In response to this comment, SACOG has removed the interchange at Feather River Blvd and SR 70 from Table 11.6 on page 11-108. This change does not have an impact on the analysis included in the EIR and would result in fewer impacts.

- 4-7.** In response to this comment, Figure 11.6 on page 11-31 is accurate as presented. Figure 11.6 shows potential inundation areas should any dams/reservoirs be breached. The labels refer to the inundation areas, which are primarily southwest of the dams/reservoirs.
- 4-8.** Recommended changes accepted. In response to this comment, SACOG has removed the second item listed in Appendix A page 129 of the project list. La Porte Road Bridge at New York Creek now appears as the third item on this page.
- 4-9.** We do not have additional questions. Thank you for providing these changes.
- 4-10.** The informational attachment is noted and requires no response.
- 4-11.** The informational attachment is noted and requires no response.



MEMORANDUM

DATE: JANUARY 4, 2012

TO: MAYWAN KRACH, ECS

FROM: REBECCA TABER

SUBJECT: METROPOLITAN TRANSPORTATION PLAN / SUSTAINABLE COMMUNITY STRATEGIES FOR 2035 UPDATE, POLICY DOCUMENT AND DRAFT EIR

5-1 The Engineering and Surveying Department and the Department of Public Works Transportation Division have reviewed the Draft Metropolitan Transportation Plan (MTP) / Sustainable Community Strategies (SCS) for 2035 and associated Draft EIR. The project applicant is the Sacramento Area Council of Governments (SACOG).

Thank you for the opportunity to review and comment on this policy document and Draft EIR. We would like to provide the following comment for your consideration:

- 5-2
1. Since the MTP is a long-range planning document for the SACOG region, the following **completed** projects should be omitted from Appendix A (list of projects):
 - a. Douglas Boulevard Pedestrian Facilities and Landscaping.
 - b. Foresthill Passing Lane Modification Project.
 - c. Sheridan SRTS Project.

5-3

2. Draft Metropolitan Transportation Plan Project List: It appears that the City of Lincoln Department of Public Works item on page 27 of 142 (dated October 27, 2011) in Appendix A to widen Fiddyment Road to 4 lanes from East Catlett to Nicolaus Road may be in error. Fiddyment Road ends at Moore Road at its northern limit, and this portion of Fiddyment is within the Placer County Department of Public Works jurisdiction.

5-4

3. Draft Metropolitan Transportation Plan Project List: There is an error on page 38 of 142 in Appendix A – instead of Bell Ave., it should be Bell Road.

cc: Phil Vassion, DPW Transportation

RESPONSE TO LETTER 5 – Placer County Department of Public Works

- 5-1.** Responses to your requested changes are listed in responses 5-2 through 5-4. You are welcome and thank you for participating in the MTP/SCS process.
- 5-2.** The recommended changes have been made to Appendix A of the MTP/SCS. Removal of these completed projects from Appendix A does not have an impact on the analysis included in the EIR because it does not remove them from the travel model analysis of the EIR.
- 5-3.** The recommended changes have been made to Appendix A of the MTP/SCS. Because this project included funding for project analysis only, there are no implications for the analysis conducted for the EIR.
- 5-4.** The recommended change has been made to Appendix A of the MTP/SCS. This change corrects an error in the title of the project. Because the description and location of the investment is correct, it does not have an impact on the environmental analysis included in the EIR.

Sacramento Public Hearing Comments from January 4, 2012

Michael Monasky 6-1	Disappointed with the public comment process. Usually, a public hearing is started and ended officially and the members who comprise the Board are present, but not a single Board member is present to hear comments.
6-2	Concerned about the air quality chapter, including diesel contaminants.
6-3	SACOG should include public health officials in public outreach.
6-4	The MTP puts too much investment in roadway projects. Greater investment in transit projects would yield better returns for reductions in vehicle miles traveled and better air quality. Vulnerable populations carry more of this burden in terms of adverse health outcomes.
6-5	GHG emissions are still growing. Roadway maintenance and rehabilitation projects (which account for \$7 billion of total MTP expenditures) should not be included as non-exempt projects in air quality conformity determinations because the current infrastructure is already causing too much GHG emissions.

The comments here are summaries of the oral testimonies provided at this public hearing.

RESPONSE TO LETTER 6 – Mike Monasky

- 6-1.** CEQA encourages, but does not require, public agencies to hold a public hearing to receive comments on environmental documents. (CEQA Guidelines, § 15087, subd. (i).) SACOG held public hearings to give the public an opportunity to comment on the DEIR in accordance with CEQA. Each public hearing was started and ended officially. At the beginning of each meeting, SACOG staff presented the format and process for the meeting. Members of the SACOG Board are not required to attend the public hearings, although some board members attended some of the public hearings. Regardless of board member attendance at the public hearings, the SACOG Board will receive a report and presentation of all oral comments received at public hearings and all written comments received via U.S. Mail and email. You may also attend regular SACOG Board meetings and committee meetings if you would like to speak directly to board members. The SACOG Board meeting and committee schedule is available at: <http://www.sacog.org/calendar/>.
- 6-2.** Please see Response 8-2 regarding diesel contaminants.
- 6-3.** SACOG developed a detailed Public Participation Plan as part of the MTP/SCS process and encouraged input from a variety of stakeholder groups, including public health officials. SACOG will continue to try to engage public health officials in its MTP/SCS outreach. The stakeholder focus groups, held at the beginning of the MTP/SCS public outreach process, was a first attempt to engage public health interests in the region on the MTP/SCS. Public services and mental health services interests attended and we asked all participants to help us to engage other potential stakeholders. However, we are always trying to broaden our outreach and will continue to try to engage public health interests in future outreach efforts.
- 6-4.** SACOG does not agree that the MTP/SCS invests too much in roadway projects. The roadway investments in the plan are important to accommodate population and housing growth. The MTP/SCS makes strategic road and highway investments to relieve congestion at existing and projected bottlenecks which facilitate a more efficient system for both transit and automobiles. The plan meets or exceeds its greenhouse gas reduction targets, in part by being careful about where it expands the road and highway system. Please also see Master Response E: Priorities and Financial Analysis for more information about how financial constraints limit investment decisions in the region.

The plan's Environmental Justice (EJ) analysis (Chapter 8) demonstrates that road projects in the MTP/SCS are located throughout the region and are not disproportionately concentrated in EJ areas. In addition, the MTP/SCS doubles transit vehicle service hours regionwide compared to a base year of 2008, and service hours on rail and bus routes that serve EJ areas increase by 88 percent.

- 6-5.** Transportation Conformity is a process set up under the Federal Clean Air Act to ensure that transportation planning, transportation improvement programs, and projects are consistent with plans to achieve and maintain Federal air quality standards. Specific

requirements are set by US Environmental Protection Agency (EPA) regulations in 40 CFR 93. The Clean Air Act does not include GHG emissions in the transportation conformity process. The SACOG conformity determination for the Plan and Program is consistent with all federal requirements.

While the Clean Air Act does not regulate GHG emissions, CEQA requires an analysis of the MTP/SCS' potential impacts to energy and global climate change. Chapter 8 of the EIR determines that implementation of the MTP/SCS, consisting of the proposed transportation investments and land use pattern, would reduce GHG emissions on a per capita and absolute basis, and in compliance with AB 32 and SB 375. No projects were exempted or excluded from this GHG analysis.



Regional Transit

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7-1

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Public Transit Since 1973

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7-2

7-3

7-4

January 9, 2012

AJ Tendick
Public Information Coordinator
Sacramento Area Council of Governments (SACOG)
1415 L Street STE 300
Sacramento, CA 95814

SUBJECT: DEIR for Draft MTP/SCS 2035

Dear Mr. Tendick:

Regional Transit (RT) commends SACOG on developing a comprehensive Metropolitan Transportation Plan (MTP)/Sustainable Communities Strategy (SCS) that emphasizes transit, compact development and job/housing balance. RT staff participated in the MTP and SCS workshops that helped form this plan. RT is very encouraged by SACOG's continuing leadership in moving the community toward more sustainable land use and transportation choices.

RT staff has reviewed the DEIR for the MTP/SCS 2035 and offer the following administrative comments:

1. Inconsistencies were found between the descriptions of transit improvements listed or shown in the document on the following pages (as well as their corresponding references in the MTP/SCS document):
 - Page 2-31 Figure 2.3 Transit Priority Areas
 - Page 2-40 Table 2.15 Table of Illustrative Projects
 - Pages 2-42, 43 & 44 Public Transit Investment
 - Page 2-46 Figure 2.5 2035 Transit Network

Inconsistencies include:

- Statements that the Green Line light rail ends at Natomas versus Sacramento International Airport
- San Joaquin intercity rail line is not shown on figures
- Alignments of BRT routes on Figure 2.3 are not consistent with those shown on Figure 2.5

2. Appendix A of the MTP/SCS lists a project to construct a multi-modal (auto, bike, pedestrian, transit) bridge across the Lower American River. This is inconsistent with RT's *Downtown/Natomas/Airport Corridor Program EIR*, April 2008, which only lists bike, pedestrian and transit on the bridge for the Green Line light rail extension.

3. RT understands that the Transit Priority Areas (TPA) defined in the MTP/SCS will allow projects proposing development within the TPA to qualify for CEQA streamlining benefits. RT is concerned that

- 7-4
Cont. | alignments of future transit projects outlined in Figure 2.3 might change paths after corridor analysis is conducted. There are also provisions in Sacramento County's Circulation Element that state Bus Rapid Transit may be defined as being built either on the roadway in exclusive lanes or on a separate, but parallel right of way. With such uncertainties on future alignments, how can the half-mile perimeters be defined for developments to benefit? Is there a way to accommodate changes in alignments?
- 7-5 | 4. Figure 2.3 shows a transit corridor reaching outside Sacramento County's Urban Policy Area (UPA) (along State Route 16). Page 2-58 describes that projects that are consistent with the SCS will not have to discuss growth-induced impacts in their project's EIR. As a service provider, RT recommends the SCS should keep the TPA within the County's UPA so that growth induced impacts will have to be analyzed in EIR's from projects wanting to annex into the UPA.
- 7-6 | 5. On Page 2-49 under the list of Local Road Investments, the category for Connectors was left out, although they are shown in Figure 2.7. Were the Connectors included in the EIR analysis?
- 7-7 | 6. Was the use of Compressed Natural Gas buses and other alternative fuel transit vehicles figured into the air quality analysis? RT suggests highlighting transit's use of alternative/ low emission fuels in Chapter 5 and pointing out that replacing future transit vehicles with these type of vehicles (as MTP projects) will also contribute to lower emissions for the region.
- 7-8 | 7. Page 16-35 lists criteria for determining significance of impacts on the transportation system. RT would also like to see an analysis if the plan causes an increase in transit ridership that exceeds the transit system's capacity at any point during the plan's period. This is significant if growth occurs faster than a transit system is able to expand.
- 7-9 | 8. Considering all Developing Communities will not necessarily have access to transit (according to Figure 3.2 in the MTP/SCS document) RT recommends adding an item to Mitigation Measure TRN-1 on page 16-48 that states developers provide shuttle service and/or funding for a shuttle for residents that are outside of walking distance from a transit line.
- 7-10 | 9. In regards to Impact TRN-5 on whether the plan causes interference with existing or planned bicycle and pedestrian facilities, even though it was found that impacts would be less than significant because the region's trips for bike and pedestrian trips per capita increase and the bike and pedestrian systems will expand overall, RT suggests that caution be noted in the EIR that during project level review this issue be looked at closely. Especially when it comes to pedestrian connectivity, any hindrance created that will block or cause a detour of a direct path (whether it is a formal or informal trail) may cause significant ramifications for a neighborhood.
- 7-11 | 10. On pages 16-62, 63 & 64, the Localized and Transit Priority Areas Impacts for TRN-5 reference Tables 16.25, 26 & 27 to show that combined walk, bike and transit

7-11
Cont. mode shares increase. Since TRN-5's analysis is only about bike and pedestrian impacts, then the transit contribution to the referenced mode share should be subtracted for comparison to the baseline.

7-12 11. RT suggests adding an item to Mitigation Measure TRN-3 on page 16-69 that states as part of construction projects that cause major traffic issues provisions shall be made to utilize transit by 1) providing a shuttle to detour around road blocks and 2) conducting a public information campaign about how to use transit and other methods of reducing driving.

7-13 12. In consideration of the fact that Alternative 3 produces fewer environmental impacts than the draft MTP/SCS does, would a plan with a larger transit investment meet the region's air quality goals better? Please explain why the MTP/SCS alternative is used for the plan instead of Alternative 3.

7-14 Thank you for the opportunity to comment. If you have questions regarding these recommendations, please contact me at (916) 556-0340 or rcovington@sacrt.com.

Sincerely,



Rosemary Covington
AGM Planning and Transit System Development

c: Jeffrey Damon, Principal Planner, RT
Traci Canfield, Planner, RT

RESPONSE TO LETTER 7 – Sacramento Regional Transit District

- 7-1.** SACOG thanks Regional Transit for its support and participation throughout the MTP/SCS process.
- 7-2.** The MTP/SCS includes the Green Line light rail extension between Downtown Sacramento and the Sacramento International Airport. The Table 2.15 reference to a terminus in Natomas has been corrected to reflect a terminus at Sacramento International Airport.

The San Joaquin rail line has been added to Figure 2.5.

The Transit Priority Areas illustrated in Figure 2.3 are not limited to or all inclusive of bus rapid transit routes (BRT). TPAs are areas of the region within one-half mile of a major transit stop (existing or planned light rail, street car, or train station) or high-quality transit corridor included in the proposed MTP/SCS. Please see Response 3-3 for the definition of high-quality transit. There is no differentiation between transit modes (rail, bus, BRT, etc.) included in the figure.

- 7-3.** The MTP/SCS includes the Lower American River Crossing as a multi-modal (auto, bike, pedestrian, transit) bridge per coordination with the City of Sacramento Department of Transportation. The City of Sacramento is the lead agency for this project and the project description reflects the scope of the project as currently defined by the City of Sacramento. The description may be modified in future MTP/SCS updates or by amendment following the need and purpose study anticipated to begin in 2012.
- 7-4.** The half-mile distance parameter in the DEIR is consistent with the transit priority project definition in Pub. Resources Code § 21155. The DEIR appropriately relies on this statutory definition. Since the MTP/SCS must be updated every four years, there are opportunities to reexamine and change alignments in future plan cycles.
- 7-5.** The TPA geography of the MTP/SCS is defined by the level of transit service identified for each region. See Response 3-3 for this definition. The growth forecasted for the area along State Route 16 and outside Sacramento County's Urban Policy Area (UPA) is surrounded on three sides by urban development and the growth area itself is anticipated to be of a high enough density and mix of uses that SACOG's travel modeling indicates high-quality transit service in this corridor would efficiently support that growth. It is not consistent with the regional transportation, air quality and greenhouse gas reduction objectives of the MTP/SCS to reduce the level of transit service from this area because it is located outside of the local UPA.
- 7-6.** Yes, the Connector projects illustrated in Figure 2.7 are included in the EIR analysis. The local road investments, as stated on page 2-49, are examples of the types of roadway improvements included in the plan. These are not meant to be a comprehensive listing of the investments included in the plan. The DEIR must analyze the MTP/SCS, including all of its elements, of which the project list is one part, and the project description must

describe the project. The full project list of the MTP/SCS, which covers 22 cities and six counties, over 1,500 projects, and 27 years of investment, is included as Appendix A to the MTP/SCS. The project description summarizes the full scope of transportation investments of the MTP/SCS qualitatively, quantitatively and graphically.

- 7-7.** Compressed Natural Gas buses are included in the baseline emissions assumptions for Sacramento County in the EMFAC emissions model. The model also accounts for turnover in the future vehicle fleet (including buses) and compliance with associated regulations that affect exhaust emissions. Since CNG buses are part of the vehicle fleet that contributes to the region's lower emissions, it is not necessary to point them out separately from other low-emission vehicles.
- 7-8.** The MTP/SCS shows significantly higher levels of utilization of transit, and higher vehicle loads on average, than occur today. The forecasting tools SACOG utilizes do not constrain demand to reasonable capacity of service on transit lines. To ensure that the forecasted demand could be reasonably served by the future year transit network, SACOG manually adjusts service frequency for high volume routes to match forecasted demand. So, if the initial demand forecast overwhelms a given line's reasonable capacity, the frequency of that line is manually increased, and the model is re-run. This process, called "transit equilibration" is repeated until a fit between demand level and service capacity is achieved. This is the normal process for transit assignment for regional demand analysis. However, many simplifications to representation of transit service and passenger demand are required to allow for computer modeling of transit. Examples of these simplifications are: no explicit representation of evening and weekend service; use of average rather than actual fares paid by passenger; simplifications of the underlying highway network on which transit runs; and omission of operational difficulties of running frequent bus service on high demand routes (e.g. "bunching") in the transit assignment process. Because of these simplifications and limitations, monitoring of actual transit service and passenger volumes through time, and adjustments to account for factors omitted by the demand modeling process, is required.
- 7-9.** SACOG agrees that this is an appropriate strategy to add to this measure. The following transportation demand management strategy has been added to the list of strategies under Mitigation Measure TRN-1:

Provide shuttle service and/or funding for a shuttle for residents that are outside of walking distance from a transit line.

- 7-10.** In response to this comment, the following sentence has been added to the end of Paragraph 1 on page 16-63:

Individual projects should be reviewed carefully as any hindrance to pedestrian travel that may block or cause a detour of a direct path may cause significant ramifications for a neighborhood.

Please also see Response 16-10 and Master Response F: Complete Streets.

7-11. The commenter suggested that bike and walk trips be split out from the combined bike, walk and transit person trips currently used for evaluation of this potential impact. The table below provides the requested information. Per capita bike and walk trips increase in each community type, and for the region as a whole. If the impact threshold for combined bike, walk and transit person trips were applied to bike and walk trips alone, the determination of no significant impact would not change.

The table also provides bike and walk trips per capita for the three Transit Priority Areas by county. Two of the three TPAs decline in per capita bike and walk trips, compared to 2008.

- In the Yolo County TPA, the decline is related to the unusually high per capita rate of biking and walking in Davis, but most of the 2008 to 2035 growth in Yolo County TPAs occurring in West Sacramento, where the rate of bike and walk trips is higher than regional average, but lower than Davis. This results in a computed decline, since very little growth occurs in the portion of the Yolo TPA in Davis. Even with this computed decline, the 2035 per capita rate (1.10) is nearly three times regional average in 2035 (0.41), and this would not be a significant impact even if only bike and walk trips were included in the impact threshold.
- The Placer County TPA is located along Douglas Boulevard in the City of Roseville. It is the lowest density TPA of the three county-level TPAs and has the lowest rate of biking and walking in the base year. The overall increase in combined bike, walk and transit is driven by an increase in transit trip-making. However, the 2035 per capita rate (0.42) is still marginally higher than the regional average in 2035 (0.41), and this would not be a significant impact even if only bike and walk trips were included in the impact threshold.

Bike + Walk Person Trips Per Capita

	2008	2035 MTP/SCS
<i>Community Type</i>		
Center & Corridor Communities	0.66	0.79
Established Communities	0.34	0.38
Developing Communities	0.20	0.24
Rural Residential Communities	0.16	0.19
Region Total	0.35	0.41
<i>Transit Priority Areas...</i>		
...in Placer County	0.46	0.42
...in Sacramento County	0.53	0.59
... in Yolo County	1.36	1.10

Source: SACOG, January 2012.

7-12. The recommended strategies have been added to Mitigation Measure TRN-3. The second suggested strategy was modified as follows:

Conduct a public information campaign about how to use transit and other methods of reducing driving to reduce single-occupant vehicle use.

- 7-13.** Based on the evaluation contained in Chapter 18 – Alternatives Analysis, Alternative 3 (Workshop Scenario 3) would be the environmentally superior alternative because it would reduce most impacts as compared to the proposed MTP/SCS. However, the overall level of impact and the conclusions regarding those that remain potentially significant and unavoidable are similar between Alternative 3 and the proposed MTP/SCS. Furthermore, none of the analyzed alternatives would better balance the project objectives, nor achieve them as well as the proposed MTP/SCS. As compared to each of the alternatives, this analysis demonstrates that adoption of the proposed MTP/SCS would be the superior choice when comparing and balancing land uses, transportation improvements, project objectives, compliance with applicable state and federal regulations, economic viability, environmental impact, and SACOG membership values. The SACOG Board of Directors will exercise its broad discretion to determine whether to approve the MTP/SCS as proposed, or in an alternative form that it believes best meets the needs of the region, based on substantial evidence.
- 7-14.** You are welcome and thank you for submitting comments on the DEIR

Testimony before the Sacramento Area Council Of Governments (SACOG)
Comments on Draft Environmental Impact Report (DEIR)
Metropolitan Transportation Planning/Sustainable Communities Strategies
Monday, January 9, 2012

Dear SACOG:

8-1 I am concerned that the public hearing scheduled for January 4, 2012, was not attended by any members of the council. I am concerned that, although the meeting was audio-recorded, the commentary and initial Question & Answer session with staff was probably not adequately recorded, as staff did not offer the microphone to the audience.

8-2 My comments are primarily on the Air Quality section, Chapter 5 of the DEIR. On page 17, it is noted that, among the top ten measured air pollutants, the greatest source of toxic air contaminants (TAC) is diesel particulate matter (DPM). There are hundreds, if not thousands, of toxic air contaminants from combusted fossil fuels which are poorly understood due to the lack of scientific research in this area. Still, 80% of cancers caused by these top ten contaminants can be linked to DPM. The latest information cited in the DEIR is from 2000, which states that 360 excess cancer deaths per million exposures occur. Despite the fact that these numbers have decreased since 1990, the entire toxic exposure picture has not been sketched, much less painted. In addition, residences near freeways and major roads have an association to non-cancer premature mortality and acute and chronic health effects.

8-3 On page 18, a 2006 EPA study revealed a correlation between particulate matter of 2.5 microns (PM_{2.5}) and non-injury death rates. When PM_{2.5} rises 10%, the death rate rises 10%. The California Air Resources Board (CARB) Handbook states there is a link between health risk and exposures to air pollutants. On page 9, the agency cites the locations of air pollution monitoring equipment; some stations are rural. On page 20, the report reminds us that the Clean Air Act (CAA) requires measures and controls for air pollutants.

8-4 On page 73, there is \$7.4 billion in project road maintenance and rehabilitation that is exempt from Federal environmental study. This is over 20% of the entire project expenditures.

8-5 This report seems to short-change the toxic effects of air pollutants in a number of ways. First, it depends upon a science which, at its infancy, is failing in its struggle to identify and measure the overwhelming number of toxic agents put into the air from fossil fuel combustion. Second, the report calls upon old information, from 2000, to measure the excess number of cancer deaths from DPM.
8-6 Third, the report reveals that stations which measure air pollutants are most likely to be remote from the sources of these agents, far from freeways, major roadways, and residences of vulnerable populations.

8-7 Fourth, Mr. Kirk Trost, SACOG counselor, stated that there will have been a 79% reduction in DPM from 2008 to 2020. Although that's a laudable reduction in DPM, it is not a guarantee of reduction in adverse health effects. Likely, this paradox occurs because of the remaining pollutants which have never been measured, in addition to the 9th highest ozone exposures in the country, in Sacramento County. Such paradoxical effect is further evidenced in the Pittsburgh-Newcastle area,

8-7
Cont. where the American Lung Association reports the 5th highest PM_{2.5} in the nation, despite the use of industrial smokestack scrubbers and low emission coke/coal. When pollution goes up, so do adverse health effects. When a fraction of one component goes down, there is no scientific evidence that the body count is reduced.

8-8 Fifth, there is no correlation between high pressure weather events and hospital/emergency room visits for lung related complaints in the report. We experience this phenomenon in winter weather of the Sacramento Valley and surrounding foothill communities. Right now we've had a string of mid-60's daytime temperatures which, associated with calm to no winds, stagnate accumulated air pollutants, resulting in warnings to avoid exposures and increased adverse health effects.

8-9 Much more needs to be studied, and done, to reduce the epidemic of asthma and chronic obstructive pulmonary disease (COPD) we experience here in the Sacramento Valley. A recent report from the University of California at San Francisco (UCSF) and the San Joaquin Valley Air Pollution Control District found a direct correlation between adverse weather events and children's visits to hospital emergency rooms. There are about 1800 pediatric visits in that district annually at a cost of at least \$1500 per visit. That comes to a cost, to the community and families, of over \$2.7 million. (<http://www.bakersfield.com/news/local/x860821917/Valley-study-links-ER-visits-with-bad-air-days>). The DEIR has no plan for research of these effects, no set-aside for reimbursing the community for the cost of the effects, and and no plan for educating the community in how to deal with the exacerbation of these diseases.

8-10 Therefore, I ask that SACOG look at a joint effort with the local public health departments and divisions, the regional public university research facilities, and local non-profit groups that advocate health and well-being for the above-mentioned vulnerable populations, to study air pollution, educate the community, and make a plan of action. I also ask that SACOG set aside monies sufficient to reimburse public health agencies for their efforts to perform health impact assessments related to these pollutant-related diseases. Such funding would include research, education, and practice to mitigate this epidemic of asthma and COPD.

8-11 Finally, there are social movements which should be included in such research and educational efforts. For example, Disability Rights and Legal Services of Northern California are groups that approached SACOG in comments on this DEIR to promote social equity for the most vulnerable populations affected by air pollutants. A consideration of social equity should include a study of poverty levels. There was no correlation between affected neighborhoods and poverty in the report. Such information should be compiled, remedies recommended, and a plan of action followed. The health and welfare of our people is at stake.

Respectfully submitted,

Michael Monasky, RCP, RRT-NPS

RESPONSE TO LETTER 8 – Michael Monasky, RCP, RRT-NPS

- 8-1.** Please see Response 6-1.
- 8-2.** The information presented in the analysis related to background risk levels from DPM in the Sacramento Valley Air Basin (360 excess cancer deaths per million in 2000) represents the best available data. In ARB's most current Almanac of Emissions and Air Quality, this is the value reported (See page 5-85, <http://www.arb.ca.gov/aqd/almanac/almanac09/pdf/chap509.pdf>). The analysis of TAC exposure was conducted in accordance with ARB's and SMAQMD's most current protocols and recommendations. These protocols and recommendations that were used in the DEIR are designed to address the issues brought forth in the comment. In addition, the DEIR contains a discussion of recent research on the link between PM2.5 and traffic-related illnesses and mortality (See discussion starting on Page 5-15 of DEIR).
- 8-3.** Please refer to response 8-2. In addition, though air monitoring locations can be rural in nature, the current protocols and recommendations that were used in the DEIR for assessing TAC exposure are based primarily on research studies as described in ARB's Air Quality and Land Use Handbook (See Table 1-2 [Basis for Recommendation column] on Page 6 of ARB's Air Quality and Land Use Handbook).
- 8-4.** Page 73 of the air quality chapter of the DEIR does not reference the amount of MTP/SCS budget allocated to road maintenance and rehabilitation. There are road maintenance and rehabilitation projects in the plan that are exempt from federal air quality conformity requirements pursuant to Table 2 and Table 3 of 40 CFR §93.126, §93.127, and in §93.128. They are not, however, exempt from CEQA, and are fully analyzed as part of the proposed project in the air quality analysis of the DEIR.
- 8-5.** Please see Response 8-2.
- 8-6.** Please see Response 8-3.
- 8-7.** The information cited in the comment regarding the 79% reduction is consistent with the most current information presented in ARB's Almanac of Emissions of Air Quality (See sentence starting at the end of Page 5-44, <http://www.arb.ca.gov/aqd/almanac/almanac09/pdf/chap509.pdf>). Also, see response to 8-2.
- 8-8.** Please see Response 8-2.
- 8-9.** Please see Response 8-2.

- 8-10.** Please see Response 8-2 and Master Response B: Health. In addition, SACOG developed a detailed Public Participation Plan as part of the MTP/SCS process and encouraged input from a variety of stakeholder groups, including groups that advocate for health and well-being through improved air quality.
- 8-11.** Please see Response 8-2 and Master Response B: Health. In addition, SACOG agrees that the social equity of the MTP/SCS is important to measure and analyze. This analysis occurs in Chapter 8 of the Draft MTP/SCS in compliance with Title VI of the Civil Rights Act and in accordance with the Federal Highway Administration's environmental justice order. Pursuant to CEQA, the DEIR appropriately analyzes environmental effects on the entire population of the MTP/SCS, regardless of income level. For this MTP/SCS, SACOG partnered with the UC Davis Center for Regional Change to augment the equity analysis beyond federal and state statutory requirements. SACOG also conducted focus groups with social equity advocates from around the region to inform both the performance measures for the MTP/SCS and outreach strategies and public workshop content. Chapter 2 and Appendices G1-G6 provide detailed information on this outreach.



MIWOK
MAIDU

United Auburn Indian Community
of the Auburn Rancheria

David Keyser
Chairman

Kimberly DuBach
Vice Chair

Gene Whitehouse
Secretary

Brenda Conway
Treasurer

Calvin Moman
Council Member

January 6, 2012

Sacramento Area Council of Governments
ATTN: EIR Comments
1415 L Street #300
Sacramento, CA 95814

Subject: Comments on the Draft Environmental Impact Report (EIR) for the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS)

Dear Sir or Madam:

9-1

The United Auburn Indian Community (UAIC) has reviewed the Draft SACOG MTP/SCS for 2035 and the associated Draft EIR. As the governing authority of land uses on UAIC Tribal lands in the plan area, and owner of the Thunder Valley Casino, UAIC is interested in the planning efforts for safe and efficient travel throughout the region. With this in mind, the Tribe is submitting the following comments for consideration during the Draft EIR public comment period.

I. Public Participation and Outreach

9-2

As noted in the Public Participation Plan (Appendix G-2), SACOG outreach to tribal governments is guided by Executive Order 13175, which defines the relationship between tribal governments, federal agencies and governments receiving federal funds. UAIC would like to thank SACOG for their early outreach during the Draft EIR process. As discussed on page 2-14 of the Draft MTP/SCS, SACOG met with UAIC in advance of the October 2010 public workshops regarding the development of the MTP/SCS. The meeting as described is accurate in that it was informational regarding the upcoming project. We feel that the description of the meeting as a discussion of specific projects and solicitation of input on the scope of the project and Draft EIR is inaccurate.

9-3

- Further coordination between the Tribe and SACOG is needed to fulfill the following goals and objectives stated in the Public Participation Plan (Appendix G-2):
 - SACOG will involve Indian Tribal governments in its development of the MTP. This includes informing Indian Tribal governments and encouraging their input on the MTP, inviting their participation, including them in the distribution of documents, and consultation during the development of the MTP.
 - SACOG will actively seek to keep Native American Indian governments informed of the agency's activities and major decisions affecting a tribal government's geographic area.
 - SACOG Board of Directors will communicate directly with Native American Indian tribal leaders on an on-going basis to identify issues of common concern.
 - Tribes should be consulted for cultural knowledge about projects.

- Since tribes are eligible to apply for and be awarded separate funding, SACOG staff needs to consult with both federal transportation agencies and local tribes to coordinate plans and projects.
- Ensure tribal government contact information is current and updated.
- Actively seek tribal government input on SACOG projects and programs through direct contact.
- Encourage the participation of Native American Indian tribal governments on SACOG advisory committees and provide reasonable opportunities to be involved in the metropolitan transportation planning process.

- UAIC requests the opportunity to participate in future informational meetings (discussed on page 2-11 of the Draft EIR) and other future engagement of local agencies.

II. Project Description

Project List

The Draft EIR is based on the foreseeable transportation projects included in the Draft MTP/SCS project list (Appendix A of the Draft MTP/SCS). The project list updates the MTP approved by the SACOG Board of Directors in 2008. The organization and format of the project list has changed which makes it difficult for the reader to compare changing priorities in the regional transportation system. For example the 2008 list is organized by lead agency while the updated list is organized by county. A comparison with the two project lists would be time-consuming for the reader and agencies to verify the assumptions of the MTP/SCS and Draft EIR. Without this information it is difficult to discern if the EIR has adequately analyzed changes since the last contemplated project list.

- We recommend presenting the project list in a consistent format through future updates to provide a comparison to previous lists. The comparison of estimated completion year, cost and project description is essential to understanding changing priorities.
- Consider assigning each project a unique identification number in the project list which can be used across updates to provide for comparison in case of changes to the listed lead agency or project name.

The 2008 project list includes an estimated completion year (2016, 2017, 2018, etc.), the updated project list restricts project completion to “by 2020” and “by 2035”. The grouping of a large number of transportation projects for completion by only two categories makes it difficult to understand transportation priorities and construction schedules.

- We recommend considering smaller intervals (such as every five years) for estimated completion date to understand the proposed timing of road improvements.

Safety Improvements

9-7

Thunder Valley Casino and Resort has 2,500 full and part time employees and receives 5.8 million visitors per year. Based on the traffic analysis prepared for the casino and resort expansion completed in 2010, the facility can generate up to approximately 18,000 midweek daily vehicle trips to and from the casino, which are dispersed on the local and regional roadway network. This last New Year's Eve, 29,000 patrons visited Thunder Valley. In the immediate vicinity of Thunder Valley, there is great potential for future economic development that will benefit the community and generate increased traffic. Due to the volume of traffic to and from Thunder Valley, safe and convenient access is a major concern of the UAIC. We believe that safe and convenient access can be improved by addressing the following concerns:

- Potential for conflicts between vehicles and trains at the at-grade Union Pacific Railroad (UPRR) crossing along Athens Avenue.
- Potential for conflicts between garbage trucks and standard passenger vehicles.
- Potential for safety hazards related to congested roadways and drivers who may not be familiar with the area.

Signage

9-8

The addition of consistent signage for Thunder Valley Casino and Resort along high-volume routes including Interstate 80, Highway 65 and County Roads is important for the safety of employees and patrons. It would reduce the use of the UPRR crossing and unnecessary traffic on local routes and surface streets from lost casino-bound drivers. UAIC has worked with Placer County to improve signage on County roadways to encourage the use of North Foothills Boulevard, which avoids the UPRR crossing, rather than Industrial Avenue. UAIC remains concerned with inadequate signage along existing Caltrans facilities to reinforce this route and future opportunities for signage along newly constructed facilities such as the Placer Parkway.

- UAIC would like to work with traffic agencies on a regional level to prioritize this issue which is not currently part of the project list.

Traffic Separation

9-9

In addition, traffic improvements and future signage in the Sunset Industrial Area should evaluate options that would better separate patron traffic to and from Thunder Valley and garbage truck traffic associated with the nearby Western Placer Waste Management Authority Materials Recovery Facility and Western Region Sanitary Landfill, located on Fiddymont Road at Athens Avenue. The size, weight and reduced sight lines of garbage trucks present an increased risk of injury from a collision with a passenger vehicle.

- UAIC would like to work with traffic agencies on a regional level to discuss possible solutions in coordination with currently planned projects.

Specific Projects

The following is a summary of the projects listed in the Draft MTP/SCS project list which UAIC views as priorities in improving traffic in the Sunset Industrial Area and surrounding roadway network:

Placer County Department of Public Works

- Placer Parkway: New 4-lane divided facility with interchange at State Route 65 “Whitney Ranch” and at grade crossings at Fiddymment and Foothills from State Route 65 to Watt Avenue. Complete by 2020. (pg 41 of Project List)
- Fiddymment Road Widening: Widen Fiddymment Road from 2 lanes to 4 lanes from Roseville City Limits to Athens Road. Complete by 2035. (pg 39 of Project List)
- Sunset Boulevard Widening: Widen Sunset Boulevard from State Route 65 to Cincinnati Avenue from two to four lanes. Project includes widening of Industrial Boulevard/UPRR overcrossing from two to four lanes. Complete by 2020. (pg 42 of Project List)

9-10

City of Roseville Department of Public Works

- Placer Ranch Parkway East: Construct new road, 2.75 mile, 4 lane divided highway between State Route 65 and Fiddymment Road. Includes interchange on State Route 65 and signalized intersections at Fiddymment Road and Industrial Ave, Preliminary Project Analysis Phase (pg 35 of Project List)

City of Lincoln Department of Public Works

- Industrial Boulevard Widening: Widen Industrial Boulevard from Route 65 to 12 Bridges Drive from 2 to 4 lanes. Complete by 2020. (pg 27 of Project List)
- Industrial Boulevard Widening: Widen Industrial Boulevard from 12 Bridges Drive to Athens Avenue from 2 to 4 lanes. Complete by 2035. (pg 27 of Project List)
- Twelve Bridges Drive Widening: Widen from Industrial Boulevard to State Route 65 Interchange from 2 to 4 lanes, including interchange improvements. Complete by 2020. (pg 28 of Project List)

Placer County Transportation Planning Agency

- Interstate 80/State Route 65 Interchange Improvements: Rebuild SR 65/I-80 Interchange to improve movement from eastbound I-80 to northbound SR 65 (Phase I). Complete by 2035. (pg 43 of Project List)

9-11

UAIC is particularly interested in the future plans for development of the alignment for the Placer Parkway project, including the interchange with State Route 65 at Whitney Ranch and interchanges with other local roadways. This is an important regional project with collaboration by multiple agencies which is anticipated to be completed by 2020. In particular, UAIC would like to see access from the Parkway at or immediately after the Whitney Ranch

interchange to the Resort and Casino, potentially at Thunder Valley Court, that would address many of the safety issues described above.

- SACOG should work with the UAIC directly on this issue to ensure the project design considers this option.

The Placer Ranch Parkway East project by the City of Roseville is listed as a separate project which could be completed by 2035. While the project is in the developing phases it will be important to develop how this project relates to Placer Parkway, which is projected for completion by 2020.

In addition, we believe that the Interstate 80/State Route 65 interchange improvements and the widening projects of Sunset Boulevard, Fiddymont Road, Industrial Boulevard and Twelve Bridges Drive would bring significant safety improvements to deal with current and anticipated traffic flows.

UAIC continues to be a major financial contributor to roadway projects in the vicinity of the Thunder Valley and has committed to fair share payments to some of the widening projects listed above. Information regarding the timing and planning for these projects is important to UAIC in planning its budget. As discussed under General Project List comments, the use of more specific completion dates would help UAIC in this regard.

III. Cultural Resources

The Draft EIR includes a discussion of potential program-level impacts to cultural resources (Chapter 7 of the Draft EIR). The Tribe agrees with the conclusion of the Draft EIR that implementation of the MTP/SCS could result in significant and unavoidable impacts to cultural resources. Construction activities from individual projects could adversely affect unknown subsurface cultural resources. The following comments are submitted for consideration with respect to this chapter of the Draft EIR:

- Page 7-21: the Draft EIR discusses that a response was received on September 26, 2011 from the Native American Heritage Commission indicated that specific tribal contacts must be made to determine relevant sacred lands in the plan area. No further discussion was provided regarding outreach to the tribal contacts.
- Page 7-44: in addition to the databases listed the Native American contacts provided by the NAHC are also primary sources which should be referenced for information on known significant cultural resources.
- Mitigation Measure CR-1 does not include a discussion of consultation with Tribes which may be necessary to adequately mitigate impacts to historic archaeological resources.
- The impacts should consider that any replacement bridgework over area waterways has the potential to disturb potentially significant archaeological resources since prehistoric and historic archaeological sites are often located on stream banks or near the confluence of streams.
- In Mitigation Measure CR-2, inadvertent discovery during construction should be a separate mitigation number. It could be easily overlooked as it is included at the end of the discussion of mitigation for affects

9-18
Cont. | to unique archaeological resources when they are known.

The Draft EIR should recommend the following for individual projects which are tiered off of the Draft EIR:

- Incorporate known cultural sites into open space or other protected areas.
- Establish conservation easements for culturally significant prehistoric sites. UAIC would be interested in holding relevant conservation easements.
- Conduct an impact analysis of cultural resources for project alternatives, including alternative transportation alignments.
- Field and site visits to project areas should be conducted where there will be anticipated impacts or disturbances.
- Agencies may consult directly with the Tribal Historic Preservation Officer in lieu of the State Historic Preservation Officer for undertakings occurring on tribal lands or undertakings directly or indirectly affecting cultural resources on tribal lands.
- Consultation with UAIC elders and UAIC Preservation staff regarding any known ethnographic resources or traditional cultural properties including follow-up consultation as necessary.
- Additional tribal consultation for individual project sites identified as positive for cultural resources or where impacts are unavoidable.
- UAIC would like the opportunity to provide Tribal representatives to monitor projects if excavation and data recovery are required for prehistoric cultural areas or in cases where ground disturbance is proposed at or near sensitive cultural resources.

9-19

UAIC is interested in receiving the following for individual projects within the SACOG MTP/SCS project area:

- Relevant cultural materials from prehistoric sites where excavation and data recovery has been performed.
- Copies of environmental notices and documents for projects.
- All confidential cultural and archaeological reports.

9-20

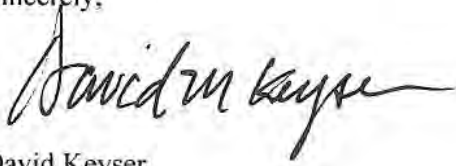
IV. Conclusion

9-21 | UAIC thanks SACOG for this opportunity to comment and looks forward to coordination for this project and future regional transportation planning efforts. As a sovereign government and significant regional employer, UAIC is

SACOG
January 6, 2012
Page 7

9-21 | very interested in ensuring that the regional transportation network is effective for the communities we work and
Cont. | live in. Questions regarding these comments can be directed to (530) 883-2390.

Sincerely,

A handwritten signature in black ink that reads "David M Keyser". The signature is written in a cursive style with a long horizontal flourish at the end.

David Keyser
Tribal Chair

RESPONSE TO LETTER 9 –UNITED AUBURN INDIAN COMMUNITY, David Keyser, Tribal Chair

9-1. These introductory comments are noted and require no response. Thank you for taking the time to comment on the DEIR

9-2. In response to this comment, SACOG has modified the fourth sentence of the last paragraph on page 2-14 of the MTP SCS to read:

SACOG met with representatives of the Yocha Dehe Wintun Nation and United Auburn Indian Community (UAIC) to discuss and provide information specific projects in their geographic areas of interest and sought input on the plan and ~~information that would be presented~~ the public workshops.

9-3. SACOG staff is currently working with UAIC to arrange a follow-up meeting to continue discussions on the MTP/SCS and DEIR.

9-4. Please see Response 9-3.

9-5. The structure and information presented in the 2008 MTP Project List and Appendix A of the MTP/SCS remain consistent with two exceptions; the Jurisdiction field has been dropped to avoid duplication with the Lead Agency field, and the Project Completion Date has been modified to provide a Completed By 2020 or 2035 Date (see response 9-6 for more information). The 2008 MTP Project List was sorted by County, Jurisdiction, Lead Agency, and Project Title, respectively. The project list contained in Appendix A of the MTP/SCS is sorted by County, Jurisdiction, and Project Title, respectively. These two sorting methods do allow for cross comparison between the two documents. However, a number of amendments to the MTP, documented through the MTP and Air Quality Conformity Analysis processes, have occurred since 2008. These amendments, along with project completions, deletions, and modifications make a page by page comparison difficult.

SACOG agrees that the use of project identification numbers would be helpful in comparing future documents. SACOG will add identification numbers to the project list in future MTP/SCS updates.

9-6. Appendix A shows projects as completed by 2020 or 2035 consistent with the major milestone years for Senate Bill 375. These years were utilized during development of the MTP/SCS transportation and land use assumptions in public workshops and in briefings to the SACOG Board of Directors. The Metropolitan Transportation Improvement Program (MTIP) provides more detail on the completion schedules for projects anticipated to receive funding over the next four years. For more information on the MTIP, visit <http://www.sacog.org/mtip/>. Another resource is the Air Quality Conformity Document that accompanies the MTP/SCS and DEIR and contains a number of milestone years in which the plan must demonstrate compliance with air quality standards. This document can also provide a better understanding of when projects are anticipated to be

completed. The Air Quality Conformity document can be found on SACOG's website at <http://www.sacog.org/airquality/>.

- 9-7.** These safety concerns are noted. Please see Response 9-8 below.
- 9-8.** The Placer County Transportation Planning Agency (PCTPA) is the designated Regional Transportation Planning Agency (RTPA) for Placer County and represents the county in all federal and state planning and programming decisions. Through a memorandum of understanding with SACOG, the Placer County Regional Transportation Plan (RTP) is incorporated into the MTP/SCS. As such, this comment has been forwarded to PCTPA.

Regarding United Auburn Indian Community of the Auburn Rancheria (UAIC) participation in regional discussions regarding transportation planning, projects, and other issues, representatives from tribal governments are members of SACOG's Regional Planning Partnership (RPP). The RPP assists SACOG with its transportation and air quality planning responsibilities. It also serves as the primary forum for interagency and public consultation requirements of federal transportation and air quality regulations. Representatives from tribal governments are invited and encouraged to attend the monthly RPP meetings. For more information about the RPP, join the RPP mailing list, or other opportunities to participate in the regional planning process please contact Monica Hernández at mhernandez@sacog.org.

- 9-9.** Please see Response 9-8.
- 9-10.** UAIC's support of these projects is noted.
- 9-11.** Please see Response 9-8.
- 9-12.** UAIC's support of these projects is noted.
- 9-13.** Please see Response 9-6. Additionally, the MTP/SCS is a long-term, regional-scale, programmatic document. As such, it does not contain details related to specific project milestones and schedules. Completion dates for the MTP/SCS are approximations and subject to change as projects move through the design, engineering, environmental, right-of-way acquisition, and construction stages. UAIC should work closely with the lead agencies for specific projects to which they are contributing funding.
- 9-14.** Mitigation Measure CR-2 requires early project-specific outreach by implementing agencies including contact with the NAHC and contact with identified Native American representatives.
- 9-15.** Page 7-44 describes the databases searched and organizations contacted as part of the research for this DEIR. Paragraph 3 on page 7-44 has been modified to clarify that SACOG also contacted the NAHC in the development of the EIR. SACOG acknowledges that the Native American contacts provided by the NAHC are primary sources to be referenced for information on known significant cultural resources.

Mitigation Measure CR-2 states that contact should be made with the NAHC and Native American representatives for projects contemplated in the MTP/SCS during future project-level review.

- 9-16.** Generally, historic built resources in the project area are not associated with Native American history or prehistory. However, if such built environment resources were located, the NAHC would be contacted and a list of potentially interested Native American representatives would be contacted, as described for archaeological resources in Mitigation Measure CR-2.
- 9-17.** Impacts CR-1 through CR-5 analyze the impacts of implementation of the MTP/SCS on cultural resources, including projects that construct new bridges or make improvements to existing bridges. Impacts from such projects are therefore covered in the aforementioned sections, and impacts resulting from the construction or ongoing operation of such projects would be subject to mitigation, as described in mitigation measures CR-1 through CR-5.
- 9-18.** As the commenter points out Mitigation Measure CR-2 establishes procedures in the last paragraph to be followed if unknown sub-surface cultural resources are found during construction of a project. Implementing agencies can adopt this paragraph as a separate mitigation or implement it as a part of this mitigation measure as written. Either method would result in the same mitigation outcome. As such the requested format change has not been made.
- 9-19.** In response to this comment, SACOG has modified the third bullet on page 7-55 to read:
- contact with Native American representatives including: a) consultation directly with the Tribal Historic Preservation Officer in lieu of the State Historic Preservation Officer for undertakings occurring on tribal lands or undertakings directly or indirectly affecting cultural resources on tribal lands; b) consultation with relevant tribal elders and preservation staff regarding any known ethnographic resources or traditional cultural properties including follow-up consultation as necessary; c) conduct additional tribal consultation for individual project sites identified as positive for cultural resources or where impacts are unavoidable;

In response to this comment, SACOG has also modified the third paragraph on page 7-56 to read:

If the archaeological survey and/or the records search indicate that unique archaeological resources, as defined (Pub. Resources Code, § 21083.2(g).), are located in the specific project area, mitigation measures shall be identified including one or more of the following:

- Avoidance through project redesign, data recovery excavation, and/or public interpretation of the resource;

- Incorporate known cultural sites into open space or other protected areas;
- Establish conservation easements for culturally significant prehistoric sites;
- Provide tribal representatives opportunity to monitor projects if excavation and data recovery are required for prehistoric cultural areas or in cases where ground disturbance is proposed at or near sensitive cultural resources.

9-20. The MTP/SCS is a long-term, regional-scale, programmatic document. Subsequent project-specific CEQA analyses will be undertaken by implementing agencies. UAIC should work closely with the lead agencies of specific projects for which they are interested in receiving project information and updates.

9-21. This concluding comment is noted. SACOG has no additional questions. Thank you for providing these comments.

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Fax: (916) 444-6661
staff@sacbreathe.org

www.sacbreathe.org
www.SceneSmoking.org
www.sacSTAND.org

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10-3 Rita Ruecker

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Jean Shaw

Sue Teranishi

Earl Withycombe

10-4 Kori Titus, CEO

*Breathe California of
Sacramento-Emigrant Trails is
dedicated to healthy air and
preventing lung and other air-
pollution related diseases by
partnering with youth, advocating
public policy, supporting air
pollution research, and educating*

*the public.
MTP/SCS 2035
Final Environmental Impact Report*



January 9, 2012

Chair Peter Hill
Board of Directors
Sacramento Area Council of Governments
1415 L Street Suite 300
Sacramento, CA 95814

Re: Draft Metropolitan Transportation Plan/Sustainable Communities Strategy 2035 (MTP/SCS 2035)

Dear Mr. Hill and SACOG Board Members,

Breathe California of Sacramento-Emigrant Trails (BCSET) has been active in the region since 1917, advocating for clean air, healthy lungs, and a tobacco free future. We have developed a Clean Air Agenda which includes various strategies and recommendations for local jurisdictions, businesses, organizations and individuals that can be achieved through efficient energy and land use. Our mission is to ensure air quality and public health concerns are being addressed through minimizing mobile source pollution and promoting alternative forms of transportation such as walking, biking, and using public transportation.

We commend SACOG's enormous effort to put forth a Sustainable Communities Strategy; we encourage efforts to meet air quality standards and continued investment in alternative forms of transportation. Although we are pleased to see a 7 % increase in funding per capita for bicycle and pedestrian use in the 2011 MTP Draft Plan for 2035; we would like to see increased funding for this effort and a developed timeline to achieve a complete system of active transportation. BCSET is confident that increasing this investment will help the overall well being of our region by reducing vehicle miles traveled and encouraging residents to use alternative forms of transportation.

As stated in the corresponding DEIR, our region will initiate efforts to develop an emissions budget for PM 2.5. In accordance to this regulation, we encourage an increase in the size of buffer zones from 500 feet to 1,000 feet in high-volume roadways and land use for residents. This will benefit public health by minimizing the impacts to residents living near roadways and high traffic areas. In addition, these mitigation practices will assist our region with meeting air quality standards as set forth by SB 375, California's sustainable communities and Climate Protection Act.

We are grateful for SACOG's staff effort and leadership to create a thorough and prosperous plan for 2035, and look forward to the continued development of this blueprint to better benefit air quality and public health in our region. As always, BCSET looks forward to continued partnership with SACOG staff and are thankful for your time.

Cordially,

Kori Titus

RESPONSE TO LETTER 10 – Breathe California of Sacramento-Emigrant Trails, Kori Titus

- 10-1.** This introductory comment is noted. SACOG appreciates Breathe California’s efforts to minimize mobile source pollutions and promoting alternative forms of transportation. These efforts support the objectives of the MTP/SCS as well.
- 10-2.** Please see Master Response E: Priorities and Financial Analysis and Master Response F: Complete Streets.
- 10-3.** This recommendation is noted; however, a distance of 500 feet is used because it is consistent with recommendations of the California Air Resources Board (ARB) and the Sacramento Metropolitan Air Quality Management District (SMAQMD). It is also consistent with Senate Bill No. 352 (Stats. 2003, ch. 668) (SB 352) (Ed. Code, § 17213; Pub. Resources Code, § 21151.8), which expands on previous requirements for the review of TAC sources near school sites and uses the distance of 500 feet for reviewing potential health risks. SACOG’s use of the 500-foot buffer zone is therefore supported by substantial evidence.
- 10-4.** You are welcome. SACOG appreciates Breathe California’s participation in this regional planning process. Thank you for your comments.

TAYLOR & WILEY

A PROFESSIONAL CORPORATION

ATTORNEYS

2870 GATEWAY OAKS DR., SUITE 200
SACRAMENTO, CALIFORNIA 95833

TELEPHONE: (916) 929-5545

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JOHN M. TAYLOR
JAMES B. WILEY
JESSE J. YANG
KATE A. WHEATLEY
MATTHEW S. KEASLING

OF COUNSEL
KATHLEEN R. MAKEL

January 9, 2012

Via Email & U.S. Mail

Sacramento Area Council of Governments
ATTN: MTP/SCS EIR Comments
1415 L Street, Suite 300
Sacramento, CA 95814

To Whom It May Concern:

11-1 We are submitting this comment letter on behalf of StoneBridge Properties, LLC, a subsidiary of Teichert Land Company. We appreciate the opportunity to comment on the draft Program Environmental Impact Report (Draft EIR) for the proposed Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 (MTP/SCS 2035). We support SACOGs efforts in adopting the MTP/SCS 2035 and accordingly our comments are very limited. Below, please find our two comments:

Biological Resources - Chapter 6.

1. Redefine Lands Along the Jackson Highway as Developed/Disturbed

11-2 In establishing the environmental setting for analysis of the impacts to Biological Resources (Chapter 6), in particular, identifying the land cover types, much of the land located just south of SR 16 between Florin Perkins Road and Excelsior Road is identified in Figure 6.1 with land cover types of Wildlands and Agriculture. These identified land cover types are inaccurate with respect to the active and former mining sites that dominate the landscape in this area. The current land cover of these mining sites does not meet the definition provided for Wildlands or Agriculture. Rather, these lands fall clearly within the definition of "disturbed" land which is defined in the document as, "The disturbed portions of the MTP/SCS plan area include nonagricultural areas that have been heavily disturbed or graded such as landfills, gravel mines, and mine tailings." (MTP/SCS DEIR, p.6-16, *emphasis added*.) As such, we request that all active and reclaimed mining sites in the Jackson Highway area have their cover type more accurately described as Developed/Disturbed.

Land Use and Planning - Chapter 12; Transportation - Chapter 16

2. Widen SR16 to Four-Lanes Between South Watt Ave. and Sunrise Blvd.

The MTP/SCS 2035 has, for obvious reasons, removed or adjusted certain transportation improvement projects that had been included in the 2008 MTP. One such project was the proposed widening of Jackson Road (SR 16) to four-lanes from South Watt Avenue to Sunrise Boulevard, which is anticipated to be completed by 2025 under the 2008 MTP. In the proposed MTP/SCS 2035 this project is identified for no construction funding during the project term, 2035. The decision to remove this proposed project seems inconsistent with project objectives, sustainable land use concepts and proposed transit improvements that are part of the MTP/SCS 2035 and that have been analyzed in the Draft EIR.

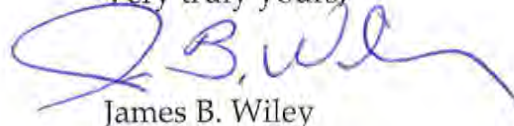
11-3

For instance, widening SR 16 to four-lanes would improve upon an existing roadway and allow it to accommodate additional/proposed transit modes while simultaneously reducing congested VMT. Much of this section of SR 16 is envisioned in the land use component of the MTP/SCS 2035 as a "Developing Community," and SR 16 is presumably intended to be significant roadway for this developing community as is signified by the Transit Priority Area (TPA) overlay that extends to Excelsior Blvd. (Draft EIR, Figure 12.2.) Additionally, SR 16 is a primary corridor for traffic from "Developing Community" areas in Rancho Cordova to the east as well as "Developing Communities" in Sacramento County to the south. In fact, many of the roadways running north/south that intersect SR 16 are proposed in the MTP/SCS 2035 for four or six-lane improvement. It would be logical to connect those roadways proposed for increased capacity with more than two-lanes traveling east/west. Finally, this portion of SR 16 is proposed for High Bus service. (Draft EIR, Figures 12.3 and 16.2.)

11-4

Please feel free to contact us should you have any questions regarding our comments.

Very truly yours,



James B. Wiley

CC: Michael Penrose
Randy Sater
Michael Isle
Josh Leachman
John Taylor

RESPONSE TO LETTER 11 – Taylor and Wiley on behalf of Stonebridge Properties, LLC

- 11-1.** These introductory comments are noted. Thank you for supporting the anticipated outcomes of the MTP/SCS.
- 11-2.** SACOG relied on the best available data for the preparation of the DEIR. The data cited in Figure 6.1 came from the South Sacramento County Habitat Conservation Plan’s cover type file from the winter of 2001. We understand that the South Sacramento Habitat Conservation Planning process is ongoing and that Stonebridge Properties is currently working with Sacramento County to revise this land cover data to reflect that the area south of SR 16 between Florin Perkins and Excelsior Roads is disturbed due to active and former mining sites. The following footnote will be added to Figure 6.1:

Land cover data for the area south of SR 16 between Florin Perkins and Excelsior Roads categorizes some lands as “agricultural” or “wildland” that should be categorized as “disturbed.” This error does not have an impact on the analysis included in the EIR and would result in fewer acres of impact.

- 11-3.** Please see Response 13-2.
- 11-4.** This is a closing statement with contact information and no response is required.

Clint Holtzen - Comment on the Draft MTP/SCS and EIR from

From: MTP Comments <chrystal2waters@yahoo.com>
To: <eircomments@sacog.org>
Date: 1/9/2012 4:20 PM
Subject: Comment on the Draft MTP/SCS and EIR from

What are you commenting on?

- Metropolitan Transportation Plan/Sustainable Communities Strategy
- Environmental Impact Report

Name

Christal Waters

Email

chrystal2waters@yahoo.com

Do you want a written response?

Yes

Address

Davis Bicycles!, c/o Christal Waters
 809 Pine Lane
 Davis, California 95616
 United States

[Map It](#)

Comments on the MTP/SCS

The following comments are submitted on behalf of Davis Bicycles!

12-1

Davis Bicycles! appreciates the opportunity to comment on the Sacramento 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy. Our comments are both on the 2035 MTP and the EIR. The 2035 MTP is complex and encourages bicycling and walking as vital modes of transportation for achieving environmentally sustainable regional growth. In our community, we see more people bicycling than we used to. Our downtown is filled with bicyclists competing for bike parking spaces. We see parents out bicycling with their children, teaching them safe bicycling as they ride. We are starting to see a turnaround in the historic decline of students bicycling and walking to school and more people are bicycling, walking and taking public transit to get to work. The 2035 MTP/SCS could take advantage of this uptick with a jumpstart to funding more active transportation projects in the near future. A near-term substantial dedication to funding bicycle and pedestrian projects would greatly increase bicycle/pedestrian modeshare far more than a slow steady increase in those active transportation expenditures, or worse, delaying those expenditures and trying to play catch-up closer to 2035. Furthermore, expenditures on active transportation are generally lower in cost than expenditures increasing freeway and arterial capacity and can be undertaken when the economy is slow and budgets are tight.

12-2

2035 MTP/SCS Questions and Comments:
 Table 4.1 on page 4-2, Summary of MTP/SCS Investments
 What capital inflation rate is used for these investment categories and is the inflation rate the same over all categories from current year to year of expenditure? If the increase in cost is measured as a percentage of current costs, the costs for the bike and pedestrian category increases at 43% - the largest cost increase. The other

12-2
Cont. categories are 40% increase for Transit and for Programs, Planning, Enhancements and 42% increase for Road and Capital Improvement Projects, and Maintenance and Rehabilitation. While it is true that bicycle and pedestrian improvements are in Maintenance and Rehabilitation Projects, the dedicated-purpose bike and pedestrian improvements, those usually associated with higher miles or higher costs, have a higher inflation rate. If the inflation rate is the same for all categories, is the higher bike/pedestrian project rate due to their implementation at a later date than the other categories? If so, then we don't believe that the Plan takes advantage of the current economy to jumpstart an active transportation modeshare that can significantly contribute to improved air quality, reduced carbon emissions, and public health.

12-3 Relationship of 2035 MTP Project List and Regional Bicycle Master Plan:
Where does the plan discuss the relationship between the 2035 MTP Project List and the Regional Bicycle Master Plan? We understand that the Regional Bicycle Master Plan and the MTP form the basis for SACOG project funding. For Yolo County, the Alternative Transportation Corridor (ATC) appears on the project list, but only through right of way acquisition, not through construction, even though the year-end date of this plan is nearly 25 years out. (See also comment above about jumpstarting bicycle/pedestrian investment.) However, the Woodland/Davis ATC is only one project and there are many projects and programs in the Davis Bicycle Plan, which is part of the Regional Bicycle Master Plan. Other projects are being considered for inclusion into our Bicycle Plan. If to be eligible for SACOG MTP funding a bicycle project or program need not be directly included in the 2035 MTP Project list, that should be so stated, and the Regional Bicycle Plan incorporated by reference into the 2035 MTP.

12-4 2035 MTP Project List for Davis:
The Fifth Street Road Diet and Multimodal Parking Structure are projects that we are aware of, and we understand the issues related to the California Street Bridge Replacement and I-80/Richards Boulevard interchange. However, we do not understand why some of the other projects have been listed. For example, we do not know why the widenings of Covell Boulevard near Hwy 113 and Mace Boulevard with completion in 2035 are included in the plan, with no new development being considered or serious problems occurring along those roads, to our knowledge.

12-5 Environmental Impact Report:
Neither Alternative 3, nor the rejected Alternatives 4 and 5 discuss the bicycle/pedestrian community's suggestion last year to accelerate funding of bicycle and pedestrian projects and programs. Alternatives 4 and 5 are rejected because of restrictions to funding sources. What would need to be changed in those funding sources to allow bicycle and pedestrian projects to receive a higher earlier priority?

12-6 Alternative 3 seems to have been dismissed because the market, local land use plans and financial incentives do not currently support the land use assumptions of Alternative 3 and because under it, congestion would increase. Given that markets respond to constraints as well as opportunities, please give some thought to allowing congestion to further increase over the short term while completing the investment in complete streets, transit and bike/pedestrian infrastructure that could further reduce congestion over the long term.

12-7 Thank you for the opportunity to comment on the 2035 MTP/SCS and its environmental impact report.
/s/

Mont Hubbard, President

RESPONSE TO LETTER 12 – Davis Bicycles!, Mont Hubbard, President

- 12-1.** Please see Master Response E: Priorities and Financial Analysis.
- 12-2.** The MTP/SCS uses the same inflation rate to escalate to year of expenditure costs across all investment categories. Appendix B-1 describes the inflation rates used to differentiate between year of expenditure and current year costs and revenues. For lump sum projects such as the bicycle and pedestrian lump sum, there is no defined completion date. For these projects the MTP/SCS uses the average inflation rate across all years of the plan to reflect a steady implementation of projects each year. The higher total growth between current year and year of expenditure values for bicycle and pedestrian projects is likely due to fewer road and other projects in the later years of the plan rather than a late implementation schedule for bike and pedestrian projects.
- 12-3.** The MTP includes a lump-sum of funding solely dedicated to bicycle and pedestrian projects, even though those projects are not specifically identified in the MTP. The lump sum is intended to fund projects included in the Regional Bicycle, Pedestrian, and Trails Master Plan (Master Plan). The Master Plan, updated every two years, is intended to identify priority projects of the cities and counties in the region. Each local agency is given the opportunity to include all or some bike and pedestrian projects into the Master Plan, and the Master Plan generally reflects projects the jurisdictions anticipate seeking funding for in the future. The Master Plan will be included as an MTP Appendix.

With regard to the Alternative Transportation Corridor (ATC), this project is identified in two locations in the Master Plan, both in the Yolo County-Multiple Jurisdictions project list and in the Yolo County-City of Davis project list. Both ATC project entries describe a class I trail between Davis and Woodland with an alignment as per the 2009 ATC feasibility study, and with an estimated cost of \$10,500,000. The projects identified in the Master Plan do not specify whether the funding is for right of way acquisition, engineering, construction, or a combination of phases. As the ATC scope and schedule become more defined, the information in the Master Plan will also become more defined. As a reminder, the Master Plan is fiscally un-constrained, and the plan is updated every two years. The most recent update was approved in June, 2011.

- 12-4.** This MTP/SCS plans for a 27 year period from 2008 to 2035. During that time the City of Davis is projected to add 4,183 new jobs and 14,137 new people. This growth and the growth in adjacent communities and the region, contribute to the need for the transportation projects identified for the City of Davis. SACOG coordinated with the City of Davis on projects included in Appendix A-1.
- 12-5.** Alternatives 4 and 5 were created in response to public requests for bicycle, pedestrian and transit-focused scenarios that reach beyond the investment levels of Alternative 3, which also reached beyond the investment levels of the prior plan. These alternatives were not carried forward for detailed review in the DEIR because the alternatives are not economically or legally feasible, and would not achieve fundamental project objectives of the MTP/SCS including supporting housing choice, jobs-housing balance, meeting

regional air quality goals and SB375 requirements, meeting federal requirements for regional transportation plans, transportation investments that provide high performance benefits for all community types, providing cost-effective investments for all transportation modes, using all revenues that are reasonable to assume, reducing VMT and congested VMT, supporting transportation choice, broadening mobility options, supporting economic vitality, and increasing safety and emergency preparedness. Please see Master Response E: Priorities and Financial Analysis for an explanation of how funding sources restrict the types and amount of investments in the MTP/SCS.

- 12-6.** The MTP/SCS relies upon complete streets, transit, and bicycle/pedestrian infrastructure to contribute to reduced congestion over the long term. Figure 5B.9 of the MTP/SCS shows that for each 1 percent increase in work transit mode share, a 5 percent decrease in congested VMT results. In the short term, the issue of accelerating investments in complete streets, transit and bicycle/pedestrian infrastructure is a matter of constrained revenue sources. Please see Master Response E: Priorities and Financial Analysis for additional response on this topic. The SACOG Board of Directors will exercise its broad discretion to determine whether to approve the MTP/SCS as proposed, or in an alternative form that it believes best meets the needs of the region, based on substantial evidence.
- 12-7.** You are welcome and thank you for taking the time to participate in the MTP/SCS process.

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January 9, 2012

Via Email & U.S. Mail

Sacramento Area Council of Governments
ATTN: EIR Comments
1415 L Street, Suite 300
Sacramento, CA 95814

To Whom It May Concern:

13-1 This comment letter is on behalf of Tsakopoulos Investments. We appreciate the opportunity to comment on the draft Program Environmental Impact Report (Draft EIR) for the proposed Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 (MTP/SCS 2035). The following is our comment on the MTP and Draft EIR:

Land Use and Planning - Chapter 12; Transportation - Chapter 16

1. Widen SR16 to Four-Lanes Between South Watt Ave. and Sunrise Blvd.

13-2 The MTP/SCS 2035 has, for obvious reasons, removed or adjusted certain transportation improvement projects that had been included in the 2008 MTP. One such project was the proposed widening of Jackson Road (SR 16) to four-lanes from South Watt Avenue to Sunrise Boulevard, which is anticipated to be completed by 2025 under the 2008 MTP. In the proposed MTP/SCS 2035 this project is identified for no construction funding during the project term, 2035. The decision to remove this proposed project seems inconsistent with project objectives, sustainable land use concepts and proposed transit improvements that are part of the MTP/SCS 2035 and that have been analyzed in the Draft EIR.

For instance, widening SR 16 to four-lanes would improve upon an existing roadway and allow it to accommodate additional/proposed transit modes while simultaneously reducing congested VMT. Much of this section of SR 16 is envisioned in

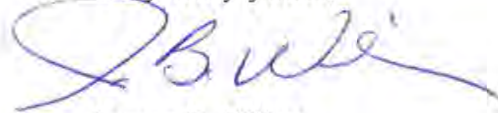
13-2
Cont.

the land use component of the MTP/SCS 2035 as a "Developing Community," and SR 16 is presumably intended to be significant roadway for this developing community as is signified by the Transit Priority Area (TPA) overlay that extends to Excelsior Blvd. (Draft EIR, Figure 12.2.) Additionally, SR 16 is a primary corridor for traffic from "Developing Community" areas in Rancho Cordova to the east as well as "Developing Communities" in Sacramento County to the south. In fact, many of the roadways running north/south that intersect SR 16 are proposed in the MTP/SCS 2035 for four or six-lane improvement. It would be logical to connect those roadways proposed for increased capacity with more than two-lanes traveling east/west. Finally, this portion of SR 16 is proposed for High Bus service. (Draft EIR, Figures 12.3 and 16.2.)

13-3

We look forward to continued participation and project adoption this spring. Please call if you have any questions regarding our comment.

Very truly yours,



James B. Wiley

CC: Michael Penrose
Angelo G. Tsakopoulos
Pete Dwelley
John M. Taylor

RESPONSE TO LETTER 13 – Taylor and Wiley on behalf of Tsakopoulos Investments

- 13-1.** Thank you for taking the time to comment on the DEIR.
- 13-2.** The reduced scope of this project is consistent with all of the objectives of the plan. Due to slower population and housing growth and reduced funding for transportation projects in the MTP/SCS compared to the 2008 MTP, a number of projects were removed or subject to reduced scopes in this update. This project then, is a prime example of the type of strategy in the plan that meets regional air quality goals, federal and state requirements for regional transportation plans, and financial constraint requirements, while reducing VMT and delivering cost-effective results from investments.

The scaled-back project is also consistent with sustainable land use concepts because it is a response to the slower population and housing growth projected to occur during the MTP/SCS planning period. Where lower growth was anticipated, projects were scaled back, delayed or removed. This strategy supports the sustainable land use concepts.

The scaled-back project is also consistent with proposed transit improvements of the plan. The MTP/SCS includes widening Jackson Highway to four lanes between Power Inn Road and South Watt Avenue and intersection improvements at Sunrise Boulevard. These improvements, along with increased capacity and operational improvements on parallel and intersecting roadways and higher frequency transit service help to reduce automobile traffic along Jackson Highway and maintain a reasonable flow of traffic for most hours of the day. SACOG's worst case projections for 2035 show some peak period congestion on Jackson Highway immediately east of South Watt Avenue and near Bradshaw Road. The remainder of the segment is projected to operate at or below capacity. The aforementioned Jackson Highway widening, plus other projects to improve both South Watt Avenue and Bradshaw Road including the intersections of both roadways with Jackson Highway, provide opportunities to resolve these issues with operational improvements at the intersections. The MTP/SCS contains a \$400 million set aside for roadway operational improvements to address future bottlenecks with Intelligent Transportation System (ITS) measures or other non-capacity improvements.

- 13-3.** This concluding statement is noted. Thank you again for your comments and for your continued participation in the MTP/SCS update.



January 9th, 2012

SACOG
1415 L Street, Suite 300
Sacramento, CA 95814

RE: Comments on Draft EIR for MTP/SCS

Dear SACOG,

Please find our attached comments on the Draft EIR for the MTP/SCS. Thank you for providing us with the opportunity to comment on this Draft EIR.”

14-1

If you have any questions, please contact me at (916) 397-4776

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Joshua Wood".

Joshua Wood
Vice President of Public Affairs
Region Builders

Executive Summary.

At Page 5, the Executive Summary states that, since the MTP/SCS is a regional plan, the EIR does not need to discuss whether the MTP/SCS is consistent with the general plans and policies of the local land use jurisdictions. That is contrary to the provisions of CEQA Guideline 15125(d). The DEIR improperly defers consideration of consistency of the MTP/SCS with the various county and city general plans as local projects are carried forward for project-specific review. SACOG's position is contrary to CEQA requirements for the DEIR on the MTP/SCS, even if it is a regional plan. CEQA Guideline 15125(d) states that

“(d) The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.”

Nothing in that Guideline exempts this DEIR from discussing the consistency of the MTP/SCS with the adopted general plans of the local land use jurisdictions where the MTP/SCS proposes to make transportation improvements. The CEQA Guideline does not state that regional plans need not consider whether they are consistent with adopted general plans because they are inferior level plans or policies as SACOG asserts in its Draft EIR.

14-2

One of CEQA's basic purposes is to inform government decision makers and the public about the potential significant environmental effects of a proposed project. (CEQA Guideline 15002(a)(1)). It appears contrary to the purposes of an EIR as an informational document that a new regional transportation improvement plan could be proposed for adoption without informing the public and the decision-makers whether the proposed regional plan would be consistent or inconsistent with existing and proposed general plans of the local jurisdictions that will be impacted by the MTP/SCS. Moreover, it is the elected representatives of those local jurisdictions who are sitting on the SACOG Board of Directors and are now being asked to adopt the proposed MTP/SCS. Such decision makers should not be asked to adopt an MTP/SCS that would impede, hamper and conflict with the general plans of the local land use jurisdictions that they represent on the SACOG Board. These are the very decision makers who need to be informed of the environmental consequences of their actions under CEQA.

Project Description.

The Project Description in the DEIR is off center and describes a scope and analysis that includes extraneous matter and goes far beyond what is needed to accurately describe the exact nature of the roadway and other types of transportation improvements that the new MTP would provide. While an EIR must include a general description of a project's characteristics, CEQA Guideline 15124 cautions that the project description “should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.” The requirement for a general description, however, must be balanced against the requirement to provide sufficient information so that the decision makers and public can understand the full scope of the project under review. *Dry Creek Citizens Coalition v. County of Tulare*, 70 Cal.App.4th 20 at 28, 82 Cal.Rptr.2d 398 (1999).

14-3

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Cont.

The Project Description in the DEIR has failed to achieve that balance. The DEIR only includes a partial description of the actual roadway improvements the MTP would provide. There are brief sample descriptions of some of the types of transportation improvements that would be provided by the MTP at Pages 2-4 and 2-41 in Table 2.15. However, for a complete description of all the transportation improvements the MTP would provide, the reader of the DEIR is referred to a completely separate document, namely, to Appendix A-1 of the MTP. An additional problem with the Project Description in the DEIR is that the reader has no way of definitively knowing which the transportation improvements briefly mentioned in Table 2.15 are major and which are minor. There are no costs or other criteria mentioned for the illustrative transportation improvements which could provide a method of ranking them in terms of size or importance. Consequently, the DEIR needs to revise the Project Description so the reader can determine which transportation improvements in Table 2.15 are major and which are minor.

14-4

A second significant concern with the DEIR is its treatment of the proposed Sustainable Community Strategy (“SCS”), which forecasts where SACOG wants growth to occur between 2008 and 2035 in order minimize the greenhouse gas (“GHG”) emissions that will result from the MTP’s implementation. The DEIR appears to have been written as if the SCS were the project, and not the MTP. Pages 2-1 through 2-33, and Pages 2-54 to 2-60 are devoted almost exclusively to a description of the SCS. While the SCS is required to be a component of the MTP, it is the transportation improvements in the MTP that are the project for purposes of CEQA. In a very real sense, the SCS is nothing more than a potential mitigation measure for reducing the MTP’s GHG emissions that has been required by SB 375. In addition, the SCS is simply a tool for development projects to obtain the benefits of CEQA streamlining with regard to GHG issues if they meet the SCS eligibility requirements.

Consequently, we believe the project examined in the DEIR was not focused on the MTP as required by CEQA. Instead it became consumed with the environmental impacts the SCS and its future land use plan might cause. The DEIR has lost its focus on examining the environmental impacts that would arise from implementing the MTP and the future growth that would occur as a result of construction of the transportation improvements contained in the MTP.

Mitigation Measures for Land Use Projects.

14-5

In its role as a regional transportation planning agency for purposes of the MTP, SACOG’s powers are very limited and circumscribed when it comes to adopting and then implementing mitigation measures pursuant to CEQA. SACOG has no authority to actually construct or provide any of the future transportation improvements proposed in the MTP. Instead, SACOG’s actions are limited to overseeing and directing funding to the local cities and counties, and public transit providers, so that those implementing agencies can put the transportation improvements described in the MTP into place. As such, SACOG cannot require the adoption of any specific mitigation measures for local projects that the local implementing agencies are approving or undertaking.

CEQA has long recognized that a public agency’s power to provide mitigation for a project being proposed by that agency may be circumscribed because of the agency’s limited

jurisdiction and powers. Public Resources Code Section 21081(a)(2) allows a public agency to make a finding that a mitigation measure is not within the responsibility and jurisdiction of the agency making the finding. CEQA Guidelines 15091(a)(2) and 15091(c) similarly allow such a finding, but only in cases where the agency making the finding does not have concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives.

In *City of Marina v. Board of Trustees* 39 Cal.4th 341, 46 Cal.Rptr.3d 355 (2006), the California Supreme Court further elaborated upon the principle that a public agency may make a finding that mitigation is the responsibility of another agency. The Court stated that such a finding was appropriate only when the other agency said to have responsibility has the exclusive responsibility. (Id at 366) An example given of when such a finding is appropriate is when the mitigation measure requires permits that another agency has the sole discretion to grant or refuse. (Id at 367) This principle of limited power to mitigate is also recognized in Public Resources Code Section 21004 where it provides that “in mitigating or avoiding a significant effect of a project on the environment, a public agency may exercise only those express or implied powers provided by law other than this division.”

Given the limitations on SACOG’s powers and the parameters of the concepts found in Section 21081 of the Public Resources Code and CEQA Guideline 15091, there are a number of instances in the DEIR where SACOG should have made a finding that the mitigation was exclusively within the jurisdiction of another agency and terminated its discussion of the issue once such a finding was made. SACOG could then proceed to find that the impact, for purposes of the DEIR, was significant and unavoidable because it did not have any basis to conclude what actions the local agencies would take in approving the specific local projects that would give rise to the environmental impact.

Instead of doing so, however, the DEIR mentions a number of possible actions that should be implemented by local agencies as mitigation to reduce identified impacts, and then reaches the conclusion that if the local lead agencies did implement such mitigation, then the impacts would be reduced to a less than significant level. This was done for the following measures:

- AES-1:** Reduce sun glare resulting from implementation of new transportation projects.
- AES-2:** Design structures to avoid or reduce impacts resulting from glare.
- AES-3:** Design lighting to minimize light trespass and glare.
- AES-7:** Implement Mitigation Measure AES-3
- AES-8:** Reduce the visibility of construction-related activities.
- AES-9:** Implement Mitigation Measure 8.
- AES-10:** Implement Mitigation Measure AES-8.
- AES-11:** Re-vegetate exposed earth surfaces.
- AES-12:** Minimize contrasts between the project and surrounding areas.
- AES-13:** Replace and renew landscaping along roadway corridors and development sites.
- AG-6:** Minimize construction-related impacts to agricultural and forestry resources.
- AG-7:** Implement Mitigation Measure AES-3.
- HYD-5:** Implement Mitigation Measure PS-1.

14-5
Cont.

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HYD-6: In areas of existing or potential future land subsidence due to groundwater pumping, establish cooperative regional relationships to define and manage sustainable yield.

NOI-2: Employ vibration-reducing measures on new and expanded rail systems.

PS-1: Ensure adequate public services and utilities will be available to satisfy levels identified in local general plans or service master plans.

USS-1: Implement Mitigation Measure PS-1.

USS-2: Implement Mitigation Measure PS-1.

CUM-10: Implement Mitigation Measures in Chapter 11. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts to a less than significant level. However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable.

CUM-14: Implement Mitigation Measures in Chapter 15. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts to a less than significant level. However SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable.

CUM-16: Implement Mitigation Measures in Chapter 17. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts to a less than significant level. However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable.

14-6

Another major problem with SACOG's approach is that its DEIR goes beyond the general mitigation measures identified above to list numerous specific actions that the local agencies should adopt in order to implement the generalized mitigation measure and thereby reduce the impact to a less than significant level. The DEIR should confine itself to stating that mitigation for the identified impacts is within the exclusive jurisdiction of another agency, not SACOG, as provided for in Section 21081 of the Public Resources Code, and leave implementation up to the local agencies. However, SACOG did not stop there. After each mitigation measure, the text of the DEIR then lists specific actions that SACOG wants the local agencies to take in order to implement SACOG's mitigation measures. By doing so, SACOG has usurped the power and jurisdiction of the local agencies to determine what is appropriate and feasible mitigation for the impacts of the individual, specific projects the local agencies are considering for approval.

Instead of allowing the local agencies to develop their own mitigation measures in light of the specific environmental setting of local projects, SACOG's DEIR has specified the actions those local agencies need to undertake in order to reduce an impact to a less than significant

level. By telling the local agencies what steps must be taken to mitigate impacts to a less than significant level, SACOG has exceeded its authority under CEQA. Public Resources Code Section 21004 states that “in mitigating or avoiding a significant effect of a project on the environment, a public agency may exercise only those express or implied powers provided by law.” SACOG has no authority to specify to local lead agencies what mitigation measures and specific mitigation activities they must take in order to mitigate for environmental impacts of specific local projects. CEQA does not confer any such power on SACOG. In *Sierra Club v. California Coastal Commission* 35 Cal.4th 839, 28 Cal.Rptr.3d 316 (2005), the California Supreme Court rejected the proposition that an agency’s powers to require mitigation could be expanded under CEQA beyond those powers otherwise conferred on the agency by other laws. The court stated:

14-6
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“In order to fulfill CEQA’s requirement that feasible mitigating actions be taken, a public agency is required to select from the various powers which have been conferred upon it by other laws, those which it determines may be appropriately and legally exercised. As these comments demonstrate, the Legislature passed section 21004 to preclude us from doing precisely what Sierra Club now asks us to do: use CEQA as a tool to expand the Commission’s authority beyond the Coastal Act’s express limits.” [Emphasis in original] (Id at 859)

In *Sierra Club v. California Coastal Commission*, the Sierra Club sued the Coastal Commission because it refused to deny a coastal development permit for a project that was located both inside and outside of the coastal zone boundary, arguing that the permit should be denied under CEQA because of impacts that the development outside of the coastal zone would have on the coastal zone. In the DEIR, SACOG similarly appears to be doing indirectly what it cannot do directly, namely, trying to require local agencies to implement specific actions as mitigation for local projects over which SACOG itself has no jurisdiction or authority to impose mitigation. By containing numerous suggestions in the text of the DEIR as to how to implement the DEIR’s mitigation measures, and also referring to such text as mitigation measures as well, the DEIR would require local agencies to adopt as mitigation a number of specific actions that SACOG is otherwise powerless to require them to follow.

We have a similar concern with regard to the impacts and mitigation measures that the DEIR identified as being significant and unavoidable, even if the local agencies did adopt all the mitigation activities that the text of the DEIR contained. This concern is present with regard to the following mitigation measures:

14-7

AES-4: Protect panoramic views and views of significant landscape features or landforms.

AES-5: Design river crossings to minimize aesthetic and visual impacts and to protect scenic and panoramic views of significant landscape features and landforms to the greatest feasible extent.

AES-6: Design projects to be visually compatible with surrounding areas.

AG-1: Mitigate for loss of farmland.

AG-2: Implement Mitigation Measure AG-1.

AG-3: Mitigate for loss of forest land or timberland.

14-7
Cont.

AG-4: Inventory innovative ideas and best practices from the RUCS toolkit, USEPA and USDA Supporting Sustainable Rural Communities publication, and other sources and implement a locally appropriate strategy to manage growth issues at the rural-urban interface to support the long-term viability of agriculture in the SACOG region.

AG-5: Implement Mitigation Measure AG-3.

AIR-1: Implementing agencies should require air quality modeling for individual land use and transportation projects to determine whether thresholds of significance for long-term operational criteria air pollutant emissions are exceeded and apply recommended applicable mitigation measures as defined by the applicable local air district.

BIO-1: Avoid, minimize, and mitigate impacts on special-status plant species.

BIO-2: Avoid, minimize, and mitigate impacts on special-status wildlife species.

BIO-3: Avoid, minimize, and mitigate impacts on special-status fish species.

BIO-4: Avoid, minimize, and mitigate impacts to riparian habitats.

BIO-5: Avoid, minimize, and mitigate impacts to oak woodland habitats.

BIO-6: Avoid, minimize, and mitigate impacts to wetland and other waters.

BIO-7: Avoid, minimize, and mitigate impacts to wildlife corridors.

BIO-8: Avoid, minimize, and mitigate impacts on protected trees and other biological resources protected by local ordinances.

BIO-9: Avoid and minimize, and mitigate for construction-related impacts.

CR-1: Conduct historical resources studies and identify and implement project-specific mitigation.

CR-2: Conduct Archeological resource Studies and identify and implement Project-Specific Mitigation.

CR-3: Reduce Visibility or Accessibility of Archeological resources.

CR-4: Conduct project-specific paleontological resources studies and identify and implement mitigation.

NOI-1: Employ measures to reduce noise from new land uses and transportation projects.

NOI-3: reduce noise, vibration, and groundbourne noise generated by construction activities.

TRN-1: Implement transportation demand management and investment strategies to reduce congested vehicle miles traveled.

TRN-2: Strategies to support the movement of agricultural products on rural roadways near growth areas.

TRN-3: Apply best practice strategies to reduce the localized impact from construction activities on the transportation system.

CUM-12: Implement Mitigation Measures in Chapter 13. Implementation of these measures will lessen this impact but not to a less than significant level. After mitigation, the regional contribution to this impact remains significant and unavoidable.

CUM-19: Implement Mitigation Measures in Chapter 17 will lessen this impact, but not to a less than significant level. After mitigation, the regional contribution to this impact remains significant and unavoidable.

Once again, we are troubled by the DEIR's approach to the significant and unavoidable impacts the above mitigation measures would reduce, but not avoid. The DEIR has made the finding that even if the local agencies adopt all the specific mitigation actions identified in the text of the DEIR, that the impacts would remain significant and unavoidable. As we have

14-7
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discussed above, SACOG does not have the power to specify the mitigation actions that the local agencies should take to reduce the environmental impacts of specific individual projects that are within the sole and exclusive jurisdiction of the local agency to approve. SACOG cannot use the DEIR to require local agencies to undertake any specific mitigation actions, either directly or indirectly. See, Public resources Code Section 21004.

14-8

A second major problem with the DEIR's approach is its wording when it comes to mitigation measures and findings. The mitigation measures noted above are virtually all followed by text which describes a number of specific actions that should be taken to implement the mitigation measure, and the DEIR then makes a finding as to the significance of the impact after mitigation. As noted above, SACOG does not have the power to specify to local agencies what specific steps or actions they should be taking to reduce environmental impacts from specific local projects that do not need SACOG approval, nor does SACOG have the authority to determine when those local projects will have significant and unavoidable impacts after mitigation. SACOG has no evidentiary basis for doing so. The DEIR is simply speculating about the unavoidable and significant impacts of local projects. An EIR is required to contain facts and analysis, not just bare conclusions or opinions. See, *Goleta Valley v. Board of Supervisors* 52 Cal.3d 553, at 568, 276 Cal.Rptr. 410 (1990). Consequently, there is no basis for the DEIR to conclude that even after mitigation by the local agencies, a particular impact would remain significant and unavoidable.

An EIR is not required to, and should not, speculate about environmental impacts that are unknown because of incomplete data and hypothetical conditions. See *Laurel Heights Improvement Association v. Regents of the University of California*, 6 Cal.4th 1112, 26 Cal.Rptr.2d 231 (1993) and *Anderson First Coalition v. City of Anderson* 130 Cal.App.4th 1173, 30 Cal.Rptr.3d 738 (2005). Consequently, the DEIR lacks support for its conclusions that future development will lead to the numerous significant and unavoidable impacts for which the DEIR has proposed the above mitigation measures, and which it would require local agencies to implement. Without data and information about the actual physical conditions present at a local project, there is no basis for the DEIR to conclude that it would be feasible for the local agencies to implement any of the mitigation described in the DEIR. It is simply speculation that doing so would reduce an individual project's impacts or that it would even be feasible to implement every type of mitigation described in the DEIR.

14-9

In light of the foregoing, SACOG must clarify the following in the Final EIR with regard to every mitigation measure it is proposing for future land use projects:

- (1) That local land use agencies retain sole and exclusive jurisdiction to determine what mitigation will be required for future specific individual projects and will not be bound in any way to implement specific mitigation actions contained in the DEIR;
- (2) That SACOG has made no findings in the DEIR that its mitigation measures are feasible for the future specific individual land use projects a local land use agency is considering for approval;
- (3) That the descriptive text in the DEIR which follows the DEIR's individual mitigation measures is not meant to specify the specific actions a local agency must implement to mitigate for an environmental impact;

14-9
Cont.

- (4) That the text in the DEIR following a mitigation measures is only included to provide potential illustrative examples, and that there has been no determination of feasibility or efficacy made for any of the examples.

Alternatives Analysis in the DEIR

The DEIR does not contain a discussion of a reasonable range of alternatives to the MTP/SCS growth forecast scenario. For example, there was no mention made in the DEIR of the future growth being proposed in the Cordova Hills area in eastern Sacramento County or the Natomas Joint Vision area north of the City of Sacramento. Both of those significant new growth areas have been proposed for years, yet the DEIR completely ignores them.

14-10

Instead of looking at a reasonable range of alternatives for future growth areas, the DEIR simply looks at variations of growth in the same geographic location. All the alternatives appear to be variations on the same theme, namely, growth at higher densities within a reduced area of SACOG's Blueprint Vision Map and within a geographic area even smaller than the proposed SCS geographic growth area. The CEQA Guidelines have long contained the requirement that an EIR contain a reasonable range of alternatives to the project or to the location of the project. See, CEQA Guideline 15126.6(a). In matters involving land use decisions the courts have required that alternative locations be evaluated. See, *Citizens of Goleta Valley v. Board of Supervisors* 197 Cal.App.3d 1167, 243 Cal.Rptr. 339 (1988). Consequently, the DEIR is deficient because it fails to look at alternative geographic locations for future growth. It simply looks at higher densities within the same location or within a smaller footprint in that location.

A reasonable range of alternatives should also have included an analysis of alternative methods of meeting CARB's 2020 and 2035 GHG emission reduction targets by setting performance standards for new growth areas, rather than simply using a subjective geographic constraint. Those new performance standards could have included an analysis of whether the SACOG region could meet the GHG emissions goals without regard to the physical location of the new projects. The DEIR contains no analysis of this as an alternative approach to meeting the CARB's GHG emission reduction targets for the SACOG region.

Consequently, the DEIR should be revised to include an SCS alternative that is not solely based on geographic location, but one based on meeting GHG emission performance standards.

RESPONSE TO LETTER 14 – Region Builders, Joshua Wood

- 14-1.** This introductory comment is noted and requires no response. Thank you for taking the time to comment on the DEIR.
- 14-2.** As stated in the DEIR, CEQA Guidelines section 15125(d) requires an EIR to discuss inconsistencies between a project and “applicable general plans.” For a general plan to be applicable to a project, the project must be “subject to” the general plan. (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 544; see also *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145, fn. 7 [explaining that to be applicable the plan must be “legally applicable, or enforceable, as to a particular project”].) The general plans of local municipalities within SACOG’s jurisdiction are not “legally applicable, or enforceable, as to the” MTP/SCS. Specifically, SB 375 does not require “a city’s or county’s land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy.” (Government Code § 65080(b)(2)(J).) Such a consistency analysis is not required because the goals and purposes of the MTP/SCS and local governmental land use plans are intentionally and fundamentally distinct. As explained in the DEIR, local government land use planning may be driven by a vision for a community that is not required to be constrained by specific economic or population forecasts, or by a mandated horizon date. The MTP/SCS must be a fiscally and time-constrained plan, with a forecasted growth pattern that is consistent with—i.e., not exceeding—the amount of forecasted population, employment, and housing growth for the region by 2035. As a result, SB 375 contemplates that inconsistencies necessarily may exist between general plan and MTP/SCS policies, and recognizes that local municipalities may take future actions to revise their general plans “to accommodate the housing related policies of a sustainable communities strategy or an alternative planning strategy adopted pursuant to Section 65080.” (Government Code § 65583(f)(3).)

Although general plans do not constitute plans applicable to the MTP/SCS for the purposes of CEQA, the DEIR nevertheless includes substantial discussion concerning the general plans of the local municipalities within SACOG’s jurisdiction. SB 375 requires that an SCS utilize the most recent planning assumptions in consideration of general plans for local municipalities within SACOG’s jurisdiction. (Government Code § 65080(b)(2)(B).) Within this context, Chapter 3, pages 3-4 to 3-8 describes the land use forecasting process, including analysis of local land use plans. Appendix E-3 of the plan, which is cross-referenced several times in Chapter 3, provides additional detail on the jurisdictional 2035 growth allocation methodology that relies upon local land use plans (page 18-32) and a detailed summary, by jurisdiction, of the regional growth pattern (pages 33-69). Each jurisdiction narrative describes the adopted and proposed land use plans considered in the MTP/SCS, including an accounting of each plan’s buildout capacity and the amount of growth the MTP/SCS forecasts for each plan area. When applicable, narratives describe local planning areas that were not included in the MTP/SCS growth forecast. The Project Description of the DEIR (Chapter 2) also summarizes this land use forecasting process and references Appendix E-3.

- 14-3.** “The level of specificity of an EIR is determined by the nature of the project and the ‘rule of reason’.” (*Laurel Heights Improvement Ass'n v. Regents of University of California* (1988) 47 Cal.3d 376, 407.) “[W]here an EIR covers several possible projects that are diverse and geographically dispersed, the agency has discretion to evaluate the potential environmental impacts of the individual projects in general terms in the EIR, while deferring more detailed evaluation of the projects for future EIR’s.” (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 271, citing *In re Bay-Delta etc.* (2008) 43 Cal.4th 1143, 1170-1171.) Here, the MTP/SCS is a regional plan covering 22 cities and six counties, over 1,500 projects, and 27 years of investment. Accordingly, the DEIR analyzes the MTP/SCS at a programmatic level.

“With respect to an EIR’s project description, only four items are mandatory: (1) a detailed map with the precise location and boundaries of the proposed project, (2) a statement of project objectives, (3) a general description of the project's technical, economic, and environmental characteristics, and (4) a statement briefly describing the intended uses of the EIR and listing the agencies involved with and the approvals required for implementation.” (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 269-270, citing CEQA Guidelines § 15124.) The Project Description of the DEIR (Chapter 2) includes all of these required elements. Specifically, the Project Description (1) includes a series of maps identifying project boundaries and the physical expansion of the transportation system include the roadway, bus and bicycle network from 2008 to 2035 (see Figures 2.1 through 2.9); (2) describes the project objectives; (3) summarizes the full scope of transportation investments of the MTP/SCS qualitatively and quantitatively including Table 2.15 , which provides an overview of select illustrative investments by category of investment and by primary transportation corridor, Table 2.14, which quantifies the transportation investments in terms of mileage and vehicle service hours, and a narrative description of each investment category, which provides the cost break-down by project type; and (4) discusses the intended uses of the program EIR. The level of detail included in the Project Description of the DEIR (Chapter 2) is appropriate based on the regional-scale of the project and the program-level analysis contained in the DEIR. If a reader is interested in more detail, the project list in Appendix A-1, which is incorporated into the DEIR by reference, is searchable by jurisdiction and individual project description.

- 14-4.** The project for the purposes of CEQA is the MTP/SCS. Due to the prohibition against piecemealing SACOG could not, consistent with CEQA, analyze the MTP as the sole project. Moreover, treating the project as the MTP as opposed to the MTP/SCS would not be consistent with SB 375. In adopting SB 375, the Legislature declared that the SCS must be “coordinated and integrated” into the MTP. (Government Code § 65584.04(i)(1).) See also Response 14-3 above, for additional discussion concerning the adequacy of the Project Description of the DEIR (Chapter 2).
- 14-5.** The commenter is correct that CEQA permits a lead agency to carry out a project for which an EIR identifies one or more significant effects on the environment if the public agency adopts a statement of overriding considerations and issues a finding that changes

or alterations are within the responsibility and jurisdiction of another agency and have been, or can and should be, adopted by that other agency. CEQA, however, does not prohibit a lead agency from including within an EIR various mitigation measures that are not within its control to implement so long as the agency has the legal discretion to consider such mitigation measures. Pursuant to Public Resources Code section 21004, a lead agency may adopt mitigation measures based on “express or implied powers provided by law.” SB 375 requires that a region’s “housing planning be coordinated and integrated with the regional transportation plan.” (Government Code § 65584.04(i)(1).) A regional transportation plan prepared by a transportation planning agency must in turn include considerations relating to “[e]nvironmental enhancements and mitigation.” (See, e.g., Government Code § 65080(b)(4)(B)(viii).) These and other pronouncements in the Transportation Planning and Programming statutes provide SACOG with “express or implied powers” to adopt mitigation measures to substantially lessen or avoid potentially significant environmental impacts of the MTP/SCS at the program level.

For the purposes of CEQA, a mitigation measure is “feasible” if it is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors. (Public Resources Code § 21061.1.) Based on the expertise of SACOG’s staff and consultants, as well as consultations with the agencies and local municipalities that would be responsible for implementing the various mitigation measures included within the DEIR, SACOG determined that all the mitigation measures included in the DEIR are potentially feasible as defined by CEQA and in many instances would be sufficient to reduce potentially significant impacts to a less than significant level if adopted. However, SACOG recognizes that it cannot require implementing agencies to adopt mitigation measures included in the DEIR, and that it is ultimately the responsibility of a lead agency during future project-level EIRs to determine and adopt mitigation based on site specific feasibility analysis. For this reason, where mitigation measures proposed to address potentially significant environmental impacts of the MTP/SCS are within the responsibility and jurisdiction of another agency the DEIR concludes that the impact remains significant and unavoidable due to the limitations on SACOG’s authority to enforce the mitigation measures. This approach is consistent with CEQA.

- 14-6.** See RTC 14-5. As stated in *City of San Diego v. Board of Trustees of California State University* (2011) 201 Cal.App.4th 1134, 1159, CEQA requires a lead agency to develop a reasonable plan for mitigation. A mitigation plan is not rendered infeasible because the lead agency must depend on another agency to adopt and implement mitigation based on project-specific considerations. (*Ibid.*)

Additionally, the California Supreme Court has held it is improper for an agency to conclude mitigation is financially infeasible where funding may be available if pursued from the state. (See, e.g., *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 367; *City of San Diego v. Board of Trustees of California State University*, *supra*, 201 Cal.App.4th at 1164-1165.) Here, funding made possible by SACOG through the MTC/SCS may be required to make some project-level mitigation feasible. Commenter’s position, if adopted by SACOG, would improperly

limit the ability of SACOG to ensure, to the greatest extent possible, that mitigation measures that may substantially lessen or avoid potentially significant impacts of the MTP/SCS are financially feasible for the lead agency to adopt during project-level environmental review where applicable.

SACOG emphasizes that through the inclusion of detailed mitigation measures within the DEIR, SACOG has not usurped the power and jurisdiction of local agencies. As stated throughout the DEIR it is ultimately the responsibility of a lead agency during future project-level EIRs to determine and adopt feasible mitigation. Substantial evidence supports the conclusions contained in the DEIR that some of the potentially significant impacts of the MTP/SCS may be reduced to a less-than-significant level if, during future project-level environmental review, the lead agency implemented the mitigation measures identified in this DEIR. However, the lead agency for such a future project is not legally compelled to adopt the mitigation measures set forth in the DEIR for the MTP/SCS if it determines that such measures are not feasible or inapplicable for site-specific reasons. Nothing in the DEIR for the MTP/SCS prohibits a lead agency conducting project-level environmental review for a project from adopting mitigation measures that are different from those identified in the EIR for the MTP/SCS.

Additionally, the DEIR does not conclude that all transportation and land use projects within SACOG's region will, on the project-level, result in the potentially significant environmental impacts identified at the programmatic level in the MTP/SCS DEIR. Where substantial evidence supports the conclusion that a future project will not result in one or more of the potentially significant environmental impacts identified in the DEIR for the MTP/SCS, no mitigation would be required pursuant to CEQA. Similarly, in the event that currently unforeseen project-specific factors make infeasible mitigation measures proposed by SACOG in the DEIR for the MTP/SCS and no alternative measures can otherwise mitigate or avoid a significant effect of the project, then the lead agency may when supported by substantial evidence adopt the findings required by Public Resources Code section 21081 and approve the project notwithstanding any significant and unavoidable impacts. Therefore, the DEIR for the MTP/SCS does not diminish in any way the jurisdiction and authority of any future lead agency for projects within the area covered by the MTP/SCS.

- 14-7.** Public Resources Code section 21002 requires agencies to adopt feasible mitigation measures in order to substantially lessen or avoid otherwise significant adverse impacts of a project. (Public Resources Code § 21002, 21081(a).) To effectuate this requirement, EIRs must set forth mitigation measures that decisionmakers can adopt at the findings stage of the CEQA process. (Public Resources Code § 21100(b)(3).) The DEIR for the MTP/SCS complies with these requirements of CEQA by setting forth potentially feasible mitigation measures to address potentially significant environmental impacts of the MTP/SCS at the program level.

The DEIR does not conclude that lead agencies conducting future project-level environmental analysis that tiers off the MTP/SCS EIR must find that each of the significant and unavoidable environmental impacts that may occur at the program level

will also result at the project-level. The MTP/SCS solely contemplates and evaluates the potential environmental impacts from the MTP/SCS within the five community types (Center and Corridor Communities, Established Communities, Developing Communities, Rural Residential Communities, and Lands Not Identified for Development in the MTP/SCS Planning Period) and three transit priority areas (Placer Transit Priority Areas, Sacramento Transit Priority Areas, and Yolo Transit Priority Areas) on the programmatic regional level. At the project level, the lead agency may find that substantial evidence demonstrates many of the significant and unavoidable impacts identified in the MTP/SCS DEIR will not occur. See also RTC 14-5 and 14-6.

- 14-8.** A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant. (CEQA Guidelines § 15064.7(a).) Consistent with the requirements of CEQA, SACOG developed, and the DEIR articulates, a threshold of significance used to determine potential environmental impacts of the MTP/SCS in each resource area addressed in the DEIR. Substantial evidence supports the environmental impact conclusions set forth in the DEIR. The commenter provides no support or explanation for its conclusion that the impacts are speculative. The DEIR demonstrates that at the regional level, based on a programmatic environmental analysis, certain environmental impacts will remain significant and unavoidable. The concerns expressed in the comment derive from the assumption that significant impacts identified on the programmatic regional level must necessarily be treated as significant impacts at the project level. This is incorrect. See RTC 14-5 through 14-7.
- 14-9.** SACOG recognizes that it cannot require implementing agencies to adopt mitigation measures included in the DEIR, and that it is ultimately the responsibility of a lead agency during future project-level EIRs to determine and adopt feasible mitigation for individual projects. For individual projects, feasibility will be determined by local agencies on a site-specific basis. See RTC 14-5 through 14-8.
- 14-10.** The requirement to discuss project alternatives in an EIR is tied to CEQA’s substantive mandate that significant environmental damage be substantially lessened or avoided where feasible. (Public Resources Code §§ 21100(b)(4), 21002.) To effectuate this substantive requirement, an EIR must describe a range of reasonable alternatives that “could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects [of the project].” (CEQA Guidelines § 15126.6(c).) Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. (CEQA Guidelines §15126.6(f)(1).) “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” (CEQA Guidelines, § 15126.6(f).) CEQA allows considerable

flexibility in fashioning a range of alternatives, in that “[n]o ironclad rules can be imposed regarding the level of detail required in the consideration of alternatives.” (*Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 745.)

The project contemplated by the MTP/SCS covers the entirety of SACOG’s jurisdiction. SACOG, therefore, cannot consider an alternative geographic location for the project; the MTP/SCS must cover SACOG jurisdictional boundaries. The alternatives analysis should, and does, consider variations of the MTP/SCS within SACOG’s jurisdiction. The MTP/SCS must be a fiscally and time-constrained plan, with a forecasted growth pattern that is consistent with—i.e., not exceeding—the amount of forecasted population, employment, and housing growth for the region by 2035. The alternatives analyzed in the EIR include the No Project / Workshop Scenario 1, the Workshop Scenario 2, and the Workshop Scenario 3. These alternatives represent a reasonable range of alternatives that may lessen or avoid one or more significant impacts of the proposed MTP/SCS. SACOG’s growth estimates are based on an examination of a wide range of factors including local general plans, state and federal policies and regulations, market conditions, the cost and timing of providing infrastructure, and future demographic trends. The two areas mentioned as being ignored were determined to face a combination of issues related to federal regulatory approvals, infrastructure provision, flooding, and/or market demand. (In October 2011, the Cordova Hills’ project proponents requested a written summary of the reasons the project was not included in the SCS. A copy of that letter is attached.) These two areas were not singled out for this consideration—the same standards and procedures were applied to all future growth areas. It is also important to remember that the MTP/SCS is updated on a federally-regulated cycle of at least every four years. This means, for instance, that if new information about individual development projects, for instance, becomes available after an MTP/SCS is adopted, SACOG is obligated to address that information in the next MTP/SCS update cycle. The comment is incorrect in asserting that there were no differences in the location of growth, but only its extent, in the alternatives. Some planned areas in the alternatives considered growth in only one alternative, and not in the others.

Similarly, an alternative based not on geographic constraints but rather on performance criteria for new growth in unidentified areas would not be consistent with SB 375. Pursuant to SB 375, a sustainable communities strategy must among other criteria (i) identify the general location of uses, residential densities, and building intensities within the region; (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (iv) identify a transportation network to service the transportation needs of the region; and (v) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a

feasible way to do so, the greenhouse gas emission reduction targets approved by the state board. (Government Code § 65080I(b)(2)(B).) These requirements for a sustainable communities strategy cannot be achieved without developing a plan based on geographic restraints for transportation and land use developments.



October 7, 2011

Ron Alvarado
Partner
Conwy LLC
5241 Arnold Avenue
McClellan, CA 95652

Dear Mr. Alvarado:

We appreciated the opportunity to meet with you again last week to discuss the Cordova Hills project. As we discussed, SACOG has received several letters regarding Cordova Hills—we have identified four letters since 2007. In each case, the letters either followed up on, or resulted in, a meeting between SACOG and members of the Cordova Hills project team. SACOG staff, and I personally, also have had numerous other meetings and telephone calls with the Cordova Hills project team over the last few years. As I think you have acknowledged, SACOG has been willing to meet and discuss the project on all occasions. As a consequence, until last week we did not believe that there were any outstanding requests for information, meetings, or written responses. In fact, as discussed below, based on our conversation in August 2010, I believed that you understood and accepted SACOG's decision not to include Cordova Hills in the three Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) alternatives that were going to be vetted in the public workshop process last fall. In light of the foregoing, I am sending this letter only in response to your specific request last week that we put in writing the issues we have discussed in our many meetings. The letter provides a brief summary of the main questions and concerns we have raised about the suitability of including Cordova Hills in this MTP/SCS update cycle.

I will first say that in our many conversations about Cordova Hills we have noted several elements of the evolving land use plan and transportation system that we thought were consistent with SACOG's priorities, and we have made suggestions for refinements to the plan. The plan in its current form contains many elements that are consistent with principles we encourage our members and members of the development community to follow. We were particularly pleased to learn recently that you intend your project to be consistent with the smart growth criteria in the County draft updated General Plan. Notwithstanding the positive elements in the current plan, for over a year we have indicated that we did not believe Cordova Hills, at this juncture, would meet the criteria for inclusion in the current update to the Metropolitan Transportation Plan, which will for the first time include a Sustainability Communities Strategy that implements SB 375, a new state law.

In June 2010, SACOG published a memorandum titled "Method for Developing MTP Update Growth Projections" to help our members and stakeholders understand the federal and state rules, and SACOG priorities when developing the land use component of the MTP/SCS. Rather than repeat the examples of market and regulatory/policy issues that we address through this process, I am reattaching the memorandum for your information and reference.

Many in the development community who read this memorandum indicated that they better understood how we do our best to take into account all of the relevant market and regulatory/policy considerations that together drive the estimate of the likely future growth pattern for the planning period (2035 in this case). Many developers specifically acknowledged the limitations SACOG had including their project in this plan update, but wanted to work with us to develop a clear process for adding more lands to the plan in future updates. As mentioned above, you told me on August 10, 2010, after reading this memorandum that you could not argue with SACOG's decision not to include Cordova Hills in the three alternatives that were going to be vetted in the public workshop process that fall, but instead would work with us and hope to be included in the next update four years hence. Last week you stated that you would not have told me that had you understood the relevance of that decision to the SCS. Although we have tried to be clear about the integral connection between this MTP update and the SCS (a point that is made throughout the memorandum), I understand that SB 375 is a new law and that we are all climbing a learning curve as we implement it for the first time. For that reason, we have tried to make it very clear in our print materials and in the verbal presentations used in dozens of public focus groups and workshops, as well as at regular briefings with our Board and Committees over the last two years, how integrally connected the MTP and SCS would be.

The 2035 MTP/SCS is based on a growth forecast that projects a need to build approximately 300,000 new housing units in the six-county region by 2035. This forecast is lower than the one underpinning the current MTP by 145,000 housing units. This means that SACOG must find that many units to *subtract from* the projected growth pattern in the currently adopted MTP. This is a unique situation in this particular plan cycle, and it creates a very high bar for new projects to be added in this update that are not in the current MTP. The approximately 300,000 new housing units preliminarily identified to be included in the updated plan are located within developing communities, established communities, and centers and corridors. These communities have a planned capacity for approximately 500,000 units, which is nearly 70% of capacity beyond the projected 300,000 units of construction by 2035.

We consider a wide range of variables in trying to answer, to the best of our ability, the straightforward question: At this time, does it appear that Cordova Hills is more likely to be constructed during the 2035 planning horizon than the 300,000 plus units of housing projected to be built in our current draft—but also should it be preferred over the more than 150,000 housing units of additional capacity in other greenfield projects in various stages of planning around the region that also are not included in our draft plan documents? Many of these 150,000 other housing units not presently in the draft plan are in developments that have been included in locally adopted plans for some time, and some have either no, or relatively minor, outstanding federal permit issues.

Beyond the regional market demand and supply issue, the key questions and concerns specific to Cordova Hills that we have raised many times with you are briefly repeated below.

- **Federal Permits.** Both the U.S. Army Corps of Engineers and U.S. Fish and Wildlife Service have jurisdiction on these lands through the Clean Water Act and Endangered Species Act. When asked to characterize the likelihood of securing the necessary federal permits under these two laws, Cordova Hills responded “it’s going to be a war.” While

that was obviously not to be taken literally, it unfortunately accurately foreshadowed the level of concern those two agencies have about this project. It also partially explains why, when the Blueprint map was adopted by the SACOG Board in December 2004, Sacramento County requested that a significant portion of the Cordova Hills site remaining as open or natural space. Moreover, while the County is working hard on the South Sacramento Habitat Conservation Plan (SSHCP), that document is not completed. One of the primary remaining outstanding issues relates to whether, and how, its resource conservation needs can be met for the Cordova Hills property given the current development plan. SACOG is a strong supporter of the SSHCP and we very much hope that it reaches a successful conclusion soon. However, recent conversations with the federal agencies confirm that there are substantial unresolved issues on the Cordova Hills site, especially that portion showing a planned 900,000 square foot commercial center fronting Grant Line Road and located in the heart of what the federal agencies consider to be a valuable vernal pool complex. The timing of the construction of Cordova Hills will remain in considerable doubt until these federal issues are resolved.

- **Commercial Center and Economic Viability.** While many aspects of the current land use plan have evolved and are now focused on building a self-contained and self-sustaining community (i.e., on-site housing substantially targeted at university students, staff, and faculty, and a series of paths to promote walking, biking, and the use of neighborhood electric vehicles for travel within the site), the large commercial center stands out as the exception. Project representatives repeatedly have said that it is sized and located not only to serve the needs of on-site residents, but a larger regional market, and have acknowledged that this will create longer distance car trips to the site. We have repeatedly raised questions about the market feasibility of a 900,000 square foot regional shopping center at that location, citing our studies showing that the region has an over 70-year supply of retail zoning now, including many other projects in the same general area that are also planning large quantities of retail. Cordova Hills consistently has told us that Cordova Hills is not economically viable without a large, regional shopping center. It has further indicated that because a large, regional shopping center on that site must have direct access to Grant Line Road it cannot be relocated to eliminate or reduce the impacts on the natural resources that the federal agencies are concerned about. Consequently, the retail center design and location creates a kind of double-bind for the project's feasibility. Our data lead us to be skeptical that the needed market demand to serve it will materialize. And it seems far from certain at this time that the project will be able to secure the needed federal permits soon, as long as the location and scale of the shopping center remain unchanged. We have suggested that a shopping center downsized to focus just on the needs of the project's residents would have both a smaller footprint and would not need to be located on Grant Line Road, in the middle of the natural resources. Cordova Hills has consistently maintained that those changes would render the project economically unviable. At the moment, it is not clear how the hard trade-offs related to the retail center are going to be successfully resolved to the mutual satisfaction of all the relevant parties.

- **University.** The planned university is a key component of this project, of course. It would be a wonderful asset to the County and region were it to be built. It is one of the few large-scale, new employers that can realistically create a relatively self-contained community, if planned and designed well. Our concerns about the university have nothing to do with its benefits, but rather, again, the current prospects for its construction given the growth forecast during the planning horizon. Finding, financing, and constructing a private 6,000 student institution of higher learning rates very high on the degree of difficulty scale, especially in this economic environment. It has never been done in this region. Unfortunately, the planned institution, the University of Sacramento, recently withdrew their involvement in the project. We are aware that you are actively soliciting a replacement institution, but that you have not been able to secure a new commitment yet. Many of the short and multi-modal trips from the project will turn into longer distance car trips if the university is not constructed early in the project, or at all. Cordova Hills indicated in a recent discussion that if Sacramento County approves an entitlement for the project it very likely will attach a condition requiring the construction of the university before other substantial construction can occur. However, the uncertainty over whether a commitment from a 6,000 student, private university will be secured any time soon is another reason for us to conclude that, for this MTP/SCS update cycle, Cordova Hills does not meet the requirements we must follow to project a land use pattern that represents the most likely to be constructed for the region.

Given all of the above, SACOG staff has concluded, and continues to believe, that adding Cordova Hills to the MTP/SCS at this time is not justified, and that it would create risks for the timely adoption of the MTP/SCS and certification of the related EIR. I know you also understand that, since Cordova Hills was not included in the alternatives analysis, adding the project now would add several months, at a minimum, to our adoption process, with new public input, technical analysis, etc. required. It is important to emphasize, however, that most of the considerations listed here relate to practical obstacles that affect the suitability of including Cordova Hills in this plan update cycle. We certainly wish Cordova Hills the best in its worthy endeavor to secure a private university, and that it will be able to resolve the financial, transportation, and natural resources issues associated with the shopping center element of the land plan. Sacramento County appears headed towards adopting a new Growth Management Element to their General Plan, which will provide tighter linkage between projects approved according to their smart growth criteria and future MTPs/SCSs. As you know, we have supported the approach the Board of Supervisors tentatively approved last month—in particular, the important variables related to passenger vehicle greenhouse gas emissions and vehicle miles traveled that are so innovatively and effectively addressed through the smart growth criteria in the County draft plan. However, notwithstanding that support, federal and state law requires that the MTP/SCS be consistent with SACOG's regional forecast and its most reasonable estimate of what is likely to be built. We look forward to continuing our constructive discussions and reconsidering this proposal as it evolves and as our future plan updates include capacity for more years of growth, and presumably higher estimates for needed housing capacity in the region.

With regard to that final point, I want to reemphasize with you a portion of our discussion from last week. First, while I think we understand the general nature your concerns about including Cordova Hills in the MTP/SCS, you know that we do not agree with your conclusions about the

consequences of that determination. SB 375 was intended to create CEQA incentives for projects consistent with the MTP/SCS. We understand that Cordova Hills does not intend to avail itself of those benefits. Under those circumstances, SB 375 expressly states that the SCS does not regulate the use of land, does not supersede the exercise of local land use authority, and does not require a local government's land use policies and regulations, including its general plan, to be consistent with the MTP/SCS. Second, and perhaps most importantly, notwithstanding our strong commitment to facts and science, SACOG recognizes the limitations on our forecasting and modeling—we cannot predict market and regulatory forces with absolute certainty over a 20-year plus period. For this reason, the regular four-year updates of the plan are important. For the same reason, we understand that consistency with the MTP/SCS is not the only question regarding any project. Over the last decade, the region has embraced a Blueprint for growth in the region to 2050. We recognize that there are many projects consistent with that vision that, for a multitude and variety of reasons, will not be included in this MTP/SCS. Again, thank you for your time and we look forward to assisting you in the future.

Sincerely,



Mike McKeever
Chief Executive Officer

cc: Greg Thatch

Comment on MTP/SCS Draft EIR

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916-761-5155

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This proposal is to realign State Highway 84 on it's north terminous from State Highway 50/Business 80 to Interstate Highway 5 at a new interchange that will be constructed at the present overcrossing just north of the town of Freeport. Continuing west from this new northern terminous, State Highway 84 would cross the Sacramento River on a new bridge following SCRSD's easement to the old railroad right-of-way in Reclamation District 307 (Lisbon Island) in Yolo County. At this point the new highway would turn south along the old railroad right-of-way until it intersected Clarksburg Road. At that point it would proceed west approximately one mile until it intersects with the present State Highway 84 and continue south on it's present route.

15-1

Benefits –

1. Reducing agricultural and other heavy commercial truck traffic using Jefferson Blvd. through the city of West Sacramento.
 - A. Reduce wear on West Sacramento city streets
 - B. Reduce West Sacramento traffic congestion
 - C. Reduce carbon footprint of West Sacramento
 - D. Better air quality for West Sacramento
 - E. Pending other road improvements, it would provide an improved evacuation route for West Sacramento in the case of flooding
 - F. Improve accessibility for flood fighting and emergency services
2. Many benefits would accrue to the Clarksburg Agricultural District as well as

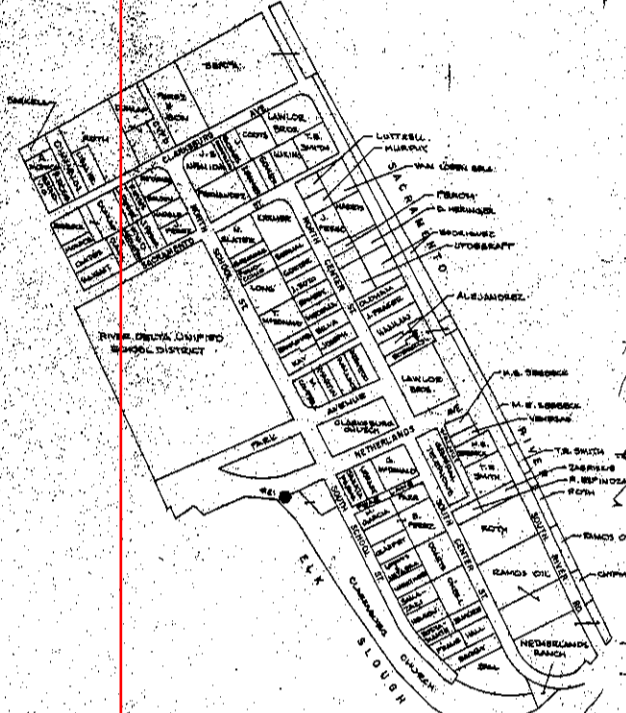
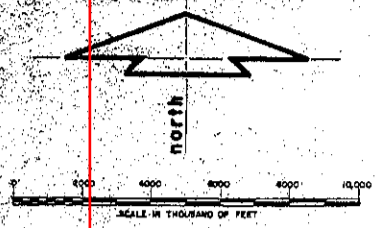
the islands on the west side of the Sacramento River to the south in Sacramento County and Solano County.

- A. Improve ingress and egress for the Clarksburg Agricultural District for agricultural and commercial trucking
- B. Pull traffic off of narrow river roads
- C. Reduce wear and maintenance on the antiquated and narrow Freeport Bridge
- D. Reduce wear and maintenance on narrow levee roads
- E. An alternate, and in many cases better, route for agricultural and commercial trucking for the islands to the south of the Clarksburg District
- F. Allows most agricultural traffic, other commercial traffic, and much of the domestic and tourist traffic to go around the town of Clarksburg or enter it from the west side
- G. Allow the Old Sugar Mill industrial area to fully develop with only minimal traffic impacts on the community of Clarksburg.
- H. Improve evacuation in the case of flooding
- I. Improve accessibility for flood fighting and emergency services on the west side of the Sacramento River

15-1
Cont.

LEGEND:

- FIELD BOUNDARIES
- PROPERTY LINES
- OWNER/CANAL/UTILITY LINES
- DISTRICT BOUNDARY
- FIELD NUMBER
- CULVERT SIZE IN INCHES
- PUMP SECTION
- SLUICE DIAMETER IN INCHES
- LAND MOOD (CONTINUATION OF PROPERTY OWNER)



CLARKSBURG DETAIL "A"
NOT TO SCALE

**NEW
Hwy 99
48 AMH**

15-2

REVISIONS	DATE
ADDED OWNERSHIP	JAN. 1995
ADDED NEW GATES	JAN. 1994
REVISION	DATE

RECLAMATION DISTRICT NO. 999
YOLCO AND SOLANO COUNTIES, CALIFORNIA

DISTRICT OWNERSHIP AND FACILITIES MAP

Sacramento Area Council of Governments
Yolo County Planning Agency

Chapter 3 - Comments and Responses to Comments - Project 99-00 PLATE 1

MAY 1995

RESPONSE TO LETTER 15 – Mark Wilson, Wilson Farms and Vineyards

- 15-1.** SACOG works in coordination with the California Department of Transportation (Caltrans) District 3 on all improvements to the State and Federal Highway system included in the MTP/SCS. Caltrans District 3 is responsible for operating, maintaining, and improving the highway system in the SACOG region. This comment has been forwarded to the Caltrans District 3 office. For more information on District 3, go to <http://www.dot.ca.gov/dist3/>.

For more information or to follow up on this comment, please contact Clint Holtzen at choltzen@sacog.org.

- 15-2.** The informational attachment has been reviewed and requires no response.



SACRAMENTO AREA BICYCLE ADVOCATES

January 9, 2012

Sacramento Area Council of Governments
SACOG Board of Directors
SACOG, MTP/SCS 2035
1415 L Street, Suite 300
Sacramento, CA 95814

Subject: Draft MTP/SCS 2035 and Draft EIR on MTP/SCS 2035

Dear SACOG Board of Directors and Executive Director Mike McKeever:

16-1

Thank you for the opportunity to comment on both the Draft MTP/SCS 2035 and its Draft EIR. We applaud SACOG for the extraordinary effort that has gone into conducting the analyses underlying the MTP/SCS and in presenting extensive amounts of information to the public. Particularly impressive was the advance in integrating land-use and transportation planning.

16-2

We appreciate that per capita funding for bike/pedestrian projects has increased by 7% since the last MTP and that many of the roadway maintenance and rehabilitation projects are to include bike and pedestrian facilities. However, we are concerned by the very small increase in bike/pedestrian mode share that is projected over the 27-yr life of the plan (e.g. non-commute bike/pedestrian mode-share increases only from 10.6% to 12.1%; see Table 5C.7). Figure 5C.6 shows that the MTP/SCS 2035 does not accelerate the growth trend of historical “bike+walk” person trips between 2008 and 2035.

We understand that the MTP/SCS is a forecast, not a regulatory program. The MTP/SCS stands, however, as a valuable planning and implementation tool that can have great impact on actual conditions for bicyclists and pedestrians. Additionally, it guides the nature of projects that will be funded by SACOG. We have 3 key recommendations for improving the MTP/SCS 2035 for bicycling in the region:

16-3

1. We suggest that the MTP/SCS 2035 **state an ambitious goal for bike/pedestrian mode-share of 20% for non-commute trips by 2035** to reflect the broad and direct importance of non-vehicular travel options for improving community health, travel safety, air quality, energy efficiency, and overall mobility of all transportation-system users. In stating an ambitious goal for mode-share increase, the MTP/SCS 2035 should focus on planning and investing in bicycle and pedestrian

infrastructure in those communities and with the types of facilities that will result in the biggest increases in mode-share.

The following strategies will help achieve a 20% non-commute bike/pedestrian mode-share by 2035:

- **Invest in bicycle and pedestrian infrastructure as soon as possible** and during the planning period to begin reaping benefits in mode-share increase as soon as possible.
- Set an equally aggressive goal for increasing the densities of urban land use to make bike and pedestrian travel more viable.
- **Focus funded projects on communities with high mode-shift potential** such as mixed-use, high-density, and transit-priority areas. For example, Environmental Justice Areas have the highest existing mode share for bicycling and walking. EJA mode share is forecast to increase at 4 times the rate of the increase in bike/pedestrian mode-share in non EJAs (Table 8.9). Therefore, roadway and bike and pedestrian projects in EJA areas should receive much higher priority for early funding.
- **Prioritize bicycle infrastructure improvements on low-volume/low-speed roadways** and streets that will be much more attractive for bicycling by a broader swath of our population than on high-speed/high-volume arterials.

2. The MTP/SCS 2035 should **strengthen the Policies and Supportive Strategies presented in Chapter 6 to better focus on assuring “Complete Streets” are implemented** wherever possible throughout the region. We believe that most MTP/SCS funded projects should have complete street elements and follow complete street principles. Nearly all transportation projects can have positive or negative impacts on travel by foot, bike, or transit and therefore should be planned with complete-street considerations, including all surface-street projects and all maintenance and rehabilitation of surface streets. Even freeway projects that create wide interchanges with high vehicle volumes and speeds should be required to install extraordinary protections for bicyclists and pedestrians in otherwise hostile environments (for example, the Hwy 50/Watt Avenue interchange project has required special bike and pedestrian infrastructure so that bicyclists and pedestrians can get safely travel through the interchange area).

Expanding Complete Streets in the region is a critical way to address the Guiding Principles of the MTP/SCS. However, Complete Streets are not the subject of any of the 31 policies (and only a few of the strategies) presented in Chapter 6 of the MTP/SCS.

We recommend that SACOG better **define the extent and purpose of adopting a Complete Streets policy** as mentioned in Strategy 9.1 (page 6-7). Strategy 9.1 supports a policy to help reduce greenhouse gas emissions. The MTP/SCS 2035

16-3
Cont.

16-4

should also recognize the many other benefits of Complete Streets such as improving community health and safety, energy efficiency, travel mobility, and air quality.

We believe this is best accomplished through a stand-alone policy under the policy category of Land Use and Environmental Sustainability to address ways to greatly expand Complete Streets in the SACOG region. **An expanded policy should recognize the many co-benefits of making streets safe and desirable for all travel modes. We recommend the Complete Streets policy include these specific strategies:**

- Establish a definition for what would qualify any street to be a complete street (using multi-modal level of service estimates),
- Develop a goal for what proportion of a jurisdiction's surface streets should ultimately qualify as Complete Streets (we believe this proportion should be near 100%),
- Establish a timetable by when local jurisdictions and the region will achieve specified proportions of making all streets complete (perhaps 50% of potential streets complete by 2025 and 100% by 2035),
- Develop and promote a template for local jurisdictions to use in considering how to make any surface street into a Complete Street, either during construction or as part of maintenance and rehabilitation,
- Offer incentives, both technical and financial, to encourage local jurisdictions to upgrade their surface streets into Complete Streets, and
- Review and comment on transportation project designs to enhance their complete-street qualifications.

16-4
Cont.

1. The MTP/SCS 2035 should **invest in planning and implementing continuous and direct bike networks between key destinations** to promote local circulation within Community Types that have greater land-use densities. Because of higher densities, the Center, Corridor, and Established Community Types have the greatest potentials for substantial increases in bike mode share.

Much of Policy 29 (in Chapter 6) encompasses strategies to invest in connectivity for local and regional circulation. We recommend that an **additional strategy be adopted to support Policy 29 that aims to define how a bike network for local circulation can qualify as safe, comfortable, continuous, and direct for potential bike riders of all ages and abilities.**

16-5

Bike networks are safe and desirable for riders of all ages and capabilities (from school children to grandparents) when they consist of bikeways that have low traffic volumes and speeds and are continuous and direct between key destinations. Such networks can be comprised of combinations of Class I paths, Class II lanes, and Class III routes but they also have special protection for bicyclists when crossing

high speed/high volume arterials or other barriers and have signage to direct riders to their intended destinations. Facilities such as protected/painted bike lanes, cycle tracks, bike boxes (for left turns and congested intersections), and special signalization may also be needed.

Key destinations include residential neighborhoods, schools, shopping and dining areas, community centers and parks, as well as job concentrations. Comfortably bike-able key destinations will typically be within distances easily traveled on a 30-minute bike ride (about 3-5 miles) for most people.

For example, continuous and direct bikeways do not currently exist between the inner “Park” neighborhoods of Sacramento and the downtown core of commercial and government offices, a distance of about 3 miles. Although current bike facilities are a gradually expanding, they are typically a patchwork of bike lanes and Class 3 routes and often these bikeways are interrupted by high volume/speed arterials without adequate protection for bicyclists and pedestrians to cross them. Even arterials with bike lanes may not feel safe for bicyclists if a high speed differential exists between vehicles and bicyclists.

In addition to our three key requests discussed above, we have these specific questions and comments:

1) Draft MTP/SCS page 4-6, 1st paragraph:
Please discuss why only 5 percent of “maintenance and rehabilitation” projects is spent on bicycle and pedestrian facilities. We believe every roadway maintenance and rehabilitation project should consider what measures and features can make the roadway safer for bicyclists and pedestrians.

2) Draft MTP/SCS page 4-7, 1st paragraph:
Please state the criteria for defining Complete Streets and discuss why only 33% of MTP/SCS projects qualify as Complete Streets.

3) Draft MTP/SCS page 5C-29, Table 5C.6:
Please explain the lack of increase in commute mode share for carpools between 2008 and 2035, even with the huge investments in carpool lanes shown in Table 4.2.

4) Draft MTP/SCS page 10-17, 3rd paragraph:
We request that the MTP/SCS 2035 provide more safety performance measures and information for bicyclists and pedestrians because vehicle collisions with such travelers have much higher risk of fatality. Specifically, these collision, fatality, and injury data should be reported per capita and disaggregated by mode and type of street or roadway of occurrence (e.g. high speed arterial, local street).

5) DEIR page 16-60 in Chapter 16 – Transportation, 1st paragraph:

16-10
Cont.

The first paragraph lists ways that roadway projects may interfere with the bicycle or pedestrian system. The first bullet should be modified to state (added text underlined): “Roadway improvement projects or land use changes which result in higher vehicle volumes or speeds adjacent to Class 1 paths or Class 2 lanes, or on Class 3 routes.” The second bullet should similarly be modified to mention Class 3 routes (which do not have painted lanes but sometimes signage, sharrows, or other markings on roadway).

16-11

Thank you for the opportunity to comment on the draft MTP/SCS 2035. We look forward to further progress with this process and again commend SACOG, its officers, and staff for their attention and hard work in making the Sacramento region a safe and desirable place to live, work, and play.

SABA works to ensure that bicycling is safe, convenient, and desirable for everyday transportation. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient, and least congesting form of transportation

Sincerely,

Tricia Hedahl
Executive Director

CC: Kacey Lizon, SACOG Senior Planner
Lacey Symons-Holtzen, SACOG Assistant Planner

Attachment: Specific Comments about MTP/SCS 2035
Chapter 6 “Policies and Supportive Strategies”

Strategy 2.1: Providing computer software and technical assistance should include tools for estimating and projecting Multi-Modal Level of Service for complete-street improvements.

Strategy 2.3: Monitoring and reporting commute patterns should cover all modes of transportation.

Strategy 2.7: Assessment of transportation projects should ensure full provision of Complete Streets features.

Strategy 3.5: Providing connections for bicyclists and pedestrians should address connections across freeways and high speed/high volume arterials in addition to gated communities, walls, and cul-de-sacs.

Strategy 3.7: Travel modeling studies should be shared with active transportation groups in addition to local governments and air districts.

Policy 17: “Preservation of the existing road and highway system as top priority for local public works agencies and Caltrans” must acknowledge that it is also high priority that that system be modified and enhanced to provide complete-street features to serve all transportation modes throughout the system.

Strategy 19.2: Supporting seamless trips should also address the “last mile problem” by providing bicycle improvements such as bike-share programs, directional signage, and bike storage facilities.

Strategy 20.1: Improving transit access should include providing designated bike routes and signage around transit stops.

Policy 22: Supporting “proactive and innovative education and transportation demand management” should include 1) a strategy to consider congestion pricing and parking management, and 2) a strategy to support active transportation groups in producing bicycle-route maps, delivering pedestrian and bicycling education, and in completing the bikeway network.

Policy 24: Outreach to low income and minority communities must include a strategy that sets a high priority on establishing continuous and direct bicycle networks to key destinations in Environmental Justice Areas because these communities currently use active transportation modes at a much higher rate than other communities and will respond with the greatest increases in bike mode share if adequate facilities exist.

16-12

16-12
Cont.

Policy 26: “Providing additional capacity for local and regional traffic on major arterials” must ensure that mobility for bicyclists and pedestrians on such arterials is enhanced and that barriers to biking and walking are not created.

Strategy 29.2: The word “eventual” modifying “creation of a regional bicycle and pedestrian network” must be replaced by the word “rapid” to demonstrate the high priority, front-loaded necessity of investing in this network, especially in Environmental Justice Areas, not just where good local circulation networks already exist.

Policy 30: Giving primary priority to “road expansion” violates the MTP/SCS Guiding Principle of Equity and Choice (i.e. provide real, viable travel choices for all people . . .). Instead this policy should state that selective road expansions will be considered if they enhance Complete Streets infrastructure and enhance mobility options for all transportation modes. As stated, this policy encourages single-occupancy vehicle travel.

RESPONSE TO LETTER 16 – Sacramento Area Bicycle Advocates

- 16-1.** Thank you for your complimentary comment and participating in this process.
- 16-2.** This comment introduces comments 34-3 through 34-5 and is noted. Thank you for taking the time to review and comment on the draft MTP/SCS. Responses to these individual comments are provided below.
- 16-3.** While a 20 percent walk and bike mode share is an admirable goal, the MTP/SCS must plan a financially constrained transportation system to support the population and growth pattern most likely to occur by a future year. This makes the MTP/SCS unique from other plans, such as general plans, which are often aspirational and not limited by such requirements. Even within these requirements, the MTP/SCS does show significant increase in the rate of non-motorized trip-making. Bike trip-making increases by 8 percent on a per-capita basis, and walk trip-making by 17 percent. The combined bike-and-walk mode share for all trips increased from 9 percent to 10.3 percent of all household-generated trips. Given that the longer term historic trend has been a decline in non-motorized trip-making, this increase is significant. Achieving a non-motorized mode share as high as 20 percent would require major changes in the costs of transportation (e.g., through many-fold increases in fuel costs, aggressive VMT fees, etc.) or major changes in social values (i.e., attitudes about modes of travel or the environment). Such changes go well beyond SACOG's ability to forecast, as well as the latitude for preparing forecasts allowed to SACOG by state and federal regulations pertaining to long range transportation planning. Regarding accelerating funding for bicycle and pedestrian improvements, please see Master Response E: Priorities and Financial Analysis.

Comments also suggest setting an equally aggressive goal for increasing urban land use densities. Unlike city and county general plans which can be visionary with aspirational goals and objectives, the MTP/SCS must be a fiscally and time-constrained plan, with a forecasted growth pattern that is consistent with, but does not exceed, the amount of forecasted population, employment, and housing growth for the region by 2035. In developing the MTP/SCS 2035 land use forecast, SACOG worked with each of the local jurisdictions to develop a growth forecast and accompanying land use allocation that reflects each of their Blueprint implementation efforts. At the same time, the MTP/SCS 2035 land use assumptions must reflect the growth pattern that is most likely to occur, based on the best information available (23 U.S.C. § 134; 42 U.S.C. § 7506; 23 C.F.R. pt. 450; 40 C.F.R. pt. 93). The resulting growth patterns are a combination of local policies, many of which reflect or are influenced by Blueprint principles, and market forces leavened by issues such as flooding and habitat conservation. The goals, policies, and strategies in the plan do support increased densities in activity centers and generally result in a more compact regional growth pattern. However, a more aggressive goal for increasing densities would not be consistent with state and federal regulations for developing the MTP/SCS.

The MTP/SCS does seek to focus investments in all modes where they make the most difference. SACOG's regional funding programs include criteria for applicants to

demonstrate that projects meet the goals and objectives of the MTP, including shifting trips from auto to transit, bicycle, and pedestrian modes.

The MTP/SCS focuses bicycle and pedestrian improvements where they are most needed, based on existing and potential demand, network gaps, and safety concerns. SACOG's Regional Bicycle, Pedestrian, and Trails Master Plan (Master Plan) serves as the basis for the regional bicycle and pedestrian system included in the MTP/SCS. Recently, the SACOG Board directed staff to develop regional policies for the Master Plan, and staff will be conducting this effort in 2012. The policies, once approved by the SACOG Board, will inform the Master Plan update and the project selection process during SACOG's next Regional Funding Program round in 2013, for the purposes of guiding the region towards creating a truly regional bicycle and pedestrian system.

- 16-4.** Thank you for these strategy recommendations. Please see Master Response F: Complete Streets.
- 16-5.** SACOG agrees that continued planning and improvement of the region's bicycle networks is important and beneficial. Policy 29 addresses bicycle safety and connectivity in strategies 29.1 thru 29.4. Strategy 29.4 specifically mentions the Bicycle and Pedestrian Funding Program, the primary mechanism by which SACOG funds bicycle and pedestrian infrastructure improvements in the region, which includes specific funding criteria relating to the safety and connectivity of the bicycle network. The Regional Bicycle, Pedestrian, and Trails Master Plan (Master Plan) includes specific goals and objectives to create a safe, convenient, and accessible bicycle and pedestrian network. SACOG will consider the additional language suggested in this comment as part of the 2013 update of the Master Plan.
- 16-6.** The MTP/SCS assumes a five percent share of the maintenance and rehabilitation budget can be anticipated for bicycle and pedestrian facility improvements. The five percent share is an estimate incorporating sidewalks and bike lanes into road maintenance and rehabilitation activities. The estimate is a reflection of the fact that the investment needed varies greatly by the project and across the region.

It should be noted that the five percent share is not a target or ceiling for bicycle and pedestrian funding as part of maintenance and rehabilitation projects. In fact, the new strategy 17.5 makes it clear that SACOG supports the further consideration of opportunities to improve the maintenance of bicycle and pedestrian facilities in coordination with traditional road rehabilitation projects.

- 16-7.** The 33% is a conservative estimate of projects including complete streets elements that increase a street's accessibility to more than a single mode of transportation, such as adding bike lanes, sidewalks, buffers, transit facilities, etc. Some projects are too far into the future to have identified a full scope, including all components that would facilitate better bicycle, pedestrian, or transit access. SACOG includes its definition of complete streets on its website as "roadways that provide for the effective movement of all public

right-of-way users. Complete streets do more than just provide facilities for pedestrians, bicycles, transit, and cars. They include consideration of ADA accessibility, comfort and safety of all users, quality of life, regional and local transportation demand, and goods movement." The discussion of complete streets in Chapter 4 of the MTP/SCS is modified to include this definition and provide more clarity on the incorporation of complete streets in the MTP/SCS.

- 16-8.** Commute carpooling as a share of total commuting has been flat or declining slightly in Sacramento, as it has in many other areas around the United States. There is no consensus yet as to the reason for this. The best single source documenting the national trend is "Commuting in America III" published by the Transportation Research Board. In the MTP/SCS, the forecasted share is flat (14.7%), but the absolute number of carpool commuters increases by 33 percent. Factors not accounted for in the basic travel demand forecasts (e.g., incentives to carpooling provided at workplaces) may result in marginally higher commute carpooling than forecasted for the MTP/SCS.
- 16-9.** See Master Response C: Safety
- 16-10.** The recommended text change has been made to the Final Environmental Impact Report. The first and second bullets on page 16-61 now read:
- Roadway improvement projects or land use changes which result in higher vehicle volumes or speeds adjacent to Class 1, ~~or~~ Class 2, or Class 3 bike routes;
 - Roadway improvement projects that eliminate Class 1, ~~or~~ Class 2, or Class 3 bike routes
- 16-11.** This comment is noted. You are welcome and thank you again for your comments and continued participation in this process.
- 16-12.** SACOG agrees with many of your comments and suggestions. While many of your comments did not require changes to specific policies or strategies, we did update a number of policies and strategies based on your input. Please see the following responses, by policy/strategy for each comment and suggestion.
- Strategy 2.1: At this time SACOG does not have tools for estimating and projecting Multi-Modal Level of Service. Please also see Master Response F: Complete Streets.
 - Strategy 2.3: SACOG has, over time, increased both its monitoring and forecasting efforts with regard to commute patterns. In monitoring activities, SACOG tracks commute trends (see the "Regional Transportation Monitoring Report" published by SACOG in 2010), including commute by all modes of transportation. An update of this report is under way now, and commuter patterns will be reported out by mode.

- Strategy 2.7: SACOG agrees that complete streets should be considered when assessing transportation projects. Inclusion of complete streets or complete corridors is a criterion in SACOG's Regional Funding Programs. However, a regional understanding of the application of complete streets in different community types is necessary before ensuring "full provision" of complete street features. Please see Master Response F: Complete Streets for more information on SACOG's future efforts.
- Strategy 3.5: SACOG agrees that these barriers should be added to the strategy. The strategy now references connections across creeks, freeways and high speed/high volume arterials.
- Strategy 3.7: SACOG shares all travel modeling studies with all appropriate SACOG Advisory Committees (including those related to active transportation, such as Bicycle and Pedestrian Committee and Transit Coordinating Committee) in addition to local governments and air districts.
- Policy 17: The policy is intended to be broadly defined and acknowledge the priorities of local public works agencies and Caltrans. Complete streets would be one of many reasons this is a top priority for local agencies. Chapter 10 of the MTP/SCS discusses in more detail road maintenance challenges and why this is a top priority for local agencies, including the relationship to complete streets projects.
- Strategy 19.2: Staff believes this comment fits best under Policy 20, Strategy 20.1. Directional signage and bike storage were added to Strategy 20.1.
- Strategy 20.1: Designated bike routes and directional signage were added to Strategy 20.1.
- Policy 22: This policy focuses on TDM strategies that offer alternatives to driving alone. The comment suggests adding a strategy to study congestion pricing and parking management, which are TDM strategies that influence behavior as opposed to offering choices. While these strategies are worth studying, their inclusion under this policy would be inconsistent with the policy's focus. However, the study of these TDM strategies is included under Policy 9, as a greenhouse gas reduction strategy. For the second strategy proposed, Strategy 22.2 describes expanding TMAs and outreach partners to provide education and advocacy programs across the region's six-county area. We believe this strategy, as currently stated, addresses the suggestion to support active transportation groups, whom SACOG considers among its outreach partners in carrying out Policy 22.
- Policy 24: While the policy addressed in the comment is about outreach, SACOG recognizes that residents of EJ areas use active transportation modes at a higher rate than residents of Non-EJ areas. Activities included in SACOG's recent

Strategic Growth Council grant application are designed to help with assessment and prioritization of bicycle and pedestrian infrastructure investments that fill gaps and are most likely to increase residents' walking, bicycling and transit use.

- Policy 26: SACOG agrees with this. Please see Master Response F: Complete Streets on strategies to support local governments in ensuring bicycle and pedestrian mobility.
- Strategy 29.2: The word eventual is stricken from the text. As described in the Master Response E: Priorities and Financial Analysis, a number of limiting factors influence the rate at which the investments in any budget category can be implemented in the MTP/SCS. However, SACOG includes complete streets, bicycle, pedestrian, and transit considerations throughout the policies and strategies included in Chapter 6 to ensure that these elements are considered whenever possible in investment decisions.
- Policy 30: SACOG has added “bicycle and pedestrian investments” to Strategy 30.2. The remainder of the policy and strategies remain the same. SACOG does not agree that this policy conflicts with the guiding principles of the MTP/SCS. In fact, the policy is aimed at prioritizing road expansion projects that support infill development and relieve key congestion areas, both of which support principles of smart land use, access and mobility, economic vitality, and equity and choice. As with bicycle and pedestrian improvements, infill development and congestion bottleneck relief are part of creating an integrated land use and transportation plan.



PO Box 1526 • Sacramento, CA • 95812

(916) 444-0022

January 9, 2012

Board of Directors
Sacramento Area Council of Governments (SACOG)
1415 L Street Suite 300
Sacramento, CA 95814

Re: Draft Metropolitan Transportation Plan/Sustainable Communities Strategy, and corresponding DEIR

Honorable Board Members and Executive Director Mike McKeever:

The Environmental Council of Sacramento (ECOS), Habitat 2020, and the California Heartland Project are unified in our support of SACOG's first joint Draft Metropolitan Transportation Plan / Sustainable Communities Strategy (MTP/SCS). The plan is a visionary approach to the SB 375 objective to link regional land use and transportation planning to reduce greenhouse gas emissions. We applaud the direction of the SACOG Board and the efforts of SACOG staff to produce a scenario that, if adhered to, will certainly make significant steps towards regional sustainability.

17-1

Considering the financial constraints of this planning cycle, we are impressed with SACOG's ability to do "more with less" by directing investment to areas that maximize impact by the cost effectiveness of smart growth and active transportation. Some of the impressive anticipated outcomes we support include:

- Meeting the CARB GHG reduction targets (10% by 2020, 16% by 2035)
- Declines in congested VMT (6.9%)
- Increases in transit service hours, system productivity, and access overall, and more so for Environmental Justice Areas
- More homes, jobs, and amenities near high-frequency transit
- 8% proportion of funding to active transportation, with additional bike/ped improvements integrated into road maintenance funds

17-2

While we strongly commend the modeling outcomes the MTP/SCS presents, there is also room for strengthening the plan to help ensure these outcomes are achieved. We fully support the many suggestions offered in the letters of ClimatePlan, Human Impact Partners, and the Coalition On Regional Equity. But, for the purposes of this letter, we are obliged to highlight some key areas of weakness that we feel could, in the long-term, be a detriment to the successful implementation of this valuable plan. We recognize that the following, in some cases, deals with processes that require further coordination with local jurisdictions, and are not necessarily in the sole control of SACOG. Given that, we offer these observations for your ongoing consideration in future work.

Transportation:

It has long been a concern of ECOS and others that, too often, housing and commercial development takes place without adequate transit, and that when and if transit is put in place, it is then difficult to change car-oriented behavior. It is understood that SB375 only requires quality transit to be *planned* within the time horizon of the MTP for residential projects to meet the criteria for CEQA benefits, and we are pleased with SACOG's approach to targeting transportation projects that will maximize effects of investment. Yet we feel that more specific strategies are needed to ensure appropriate phasing of transit and active transportation improvements with residential development.

17-3

We hope to see SACOG review transportation project phasing in relationship to current densities and the timing of future development, working with other agencies and local jurisdictions to establish protocols which: identify and accelerate transit for high-density arterial corridors and existing urban areas that currently lack adequate service: flag and defer or cancel any costly transit capital projects that would begin construction before the densities would justify the cost (as suggested by Strategy 28.9): Flag, defer or cancel road and transit construction that would trigger premature peripheral growth.

Land Use:

The land use forecast in the MTP/SCS represents an improvement over previous regional planning efforts. The MTP/SCS anticipates accommodating expected growth with a vision toward more efficient land use and a smaller expansion of the regional development footprint. There are a variety of factors that help to make this MTP update a promising step toward a sustainable future for the Sacramento region, including the first-time incorporation of SB 375 requirements, SACOG's advanced modeling tools, and extensive public outreach to help define the MTP/SCS preferred scenario for land use and transportation.

17-4

Despite these improvements, the MTP/SCS includes key assumptions that, if adopted, could hinder the region's ability to achieve important land use and transportation objectives.

The single most important assumption in the MTP/SCS land use forecast that should be reviewed is the overestimation of demand for single-family large-lot housing. Although this type of housing has dominated residential development throughout the region for the past several decades, independent studies consistently show that demographic changes are reducing the demand for this type of housing. The MTP/SCS acknowledges that "...there will be significant demand, especially by the large, retirement age baby boomer generation and the even larger Generation Y echo-boomer cohort (those born between 1978 and 1994), for new housing, including rentals and small lot homes..."¹. Despite this, Table 3.9 of the MTP/SCS shows that 28 percent of new housing in 2035 is single-family large-lot.

17-5

This contrasts sharply with at least one recent study concluding that the Sacramento region already has enough single-family large-lot residential supply to meet demand through 2035.²

¹ SACOG, Draft MTP/SCS 2035, November 10, 2011, p. 3-13.

² Nelson, Arthur C. *The New California Dream: How Demographic and Economic Trends May Shape the Housing Market*. Washington, D.C.: Urban Land Institute, 2011, Table 4.4, p. 43.

This study by the Urban Land Institute estimated that over half of the residential demand between 2010 and 2020 will be for attached units; and by 2035, about 60% of demand will be for attached units. The MTP/SCS predicts a lower share of attached units.

This result of this overemphasis on single-family large-lot development is significantly more developed acreage than necessary to meet demand, and the less-compact land use form results in greater vehicle trip lengths and greenhouse gas emissions. Table 3.11 of the MTP/SCS shows that 45 percent of additional developed acres between 2008 and 2035 are in Developing Communities – where much of the single-family large-lot development would occur.

17-5
Cont.

The fundamental cause of this problem is the MTP/SCS assumption that 42 percent of forecasted housing demand and 18 percent of employment demand will be in Developing Communities.³ Not surprisingly, the largest increase in housing units by community type between 2008 and 2035 is in Developing Communities, where the share of housing units increases from three percent in 2008 to 13 percent in 2035.

To remedy this problem, we recommend that SACOG work with individual jurisdictions to refine the demand analysis and land use distribution to reduce the 2035 forecasted housing unit allocation for Developing Communities by at least 50% (to a total of not more than 75,000 units) and reallocate the remainder to Center and Corridor Communities.

17-6

In addition, we encourage SACOG to develop a guidebook that provides clear examples of the key characteristics of the various development types in the MTP/SCS. The Guidebook could be developed similar to the Title 24 guidebook that was published shortly after the Title 24 standards were adopted in 1978.

17-7

Finally, SACOG's 2020 and 2035 GHG reduction targets are difficult to consider at the Plan or Project level because there is currently no method/model that could evaluate plan or project performance at meeting the targets. We encourage SACOG to work with ARB, local air districts, educational institutions, and others to develop technical tools (similar to CalEEMod) that would provide the ability to evaluate individual projects and their contribution to regional targets.

CEQA Streamlining Determination Process:

17-8

SB 375 gives the local jurisdiction the discretion for making the determination for what level of CEQA exemptions a project is qualified for within the SCS, but, while it is suggested, there is no mandate for a public notice, hearing or review process for this determination (PRC 21155.1). In most cases, the usual required CEQA process would ensue after the determination, but of course; the determination affects what will be reviewable in that process. Further, after that determination, the ability to challenge findings is made more difficult, being raised to the "substantial evidence" standard. And with no precedence, it remains unclear if it is possible to challenge the determination itself. And, in the event that a project is dubbed to be a "sustainable communities" project, qualifying for a full CEQA exemption, then there will be no ensuing process.

Page 3-36 of the plan states, "To determine a project's consistency with the SCS, a jurisdiction must find it consistent with the general land use, density, intensity, and any applicable land use

³ SACOG, p. 3-15.

policies of the SCS. Additional information by jurisdiction and community type is provided in Appendix E-3.”

17-8
Cont.

The jurisdictional narratives of anticipated growth in Appendix E-3, in conjunction with the primary map of the plan by community type (Figure 3-2, MTP/SCS, p. 3-11) and the breakdown of qualifications for the levels of CEQA benefits in Table 2-16 (DEIR, p. 2-60) offer a very broad net for jurisdictions to make the interpretation of "consistency" with the SCS, or judge the impacts that have been addressed by the programmatic SCS EIR. We understand that SACOG does not have the capacity to provide oversight for all regional project-level determinations, but lacking this oversight or a more specific guide for land-use designations, it is extremely important that there be a public process *before* these determinations are made. At the very least, an opportunity for public input should be established in coordination with the local jurisdictions to ensure that equity, health, and environmental interests are adequately addressed.

Natural Resources:

17-9

We are greatly concerned about the continued trend of greenfield development in the region. We support the reduced growth footprint of this MTP/SCS, yet there remains a substantial amount of greenfield development within the footprint (that will now receive CEQA exemptions). And further, there are currently many thousands of acres of proposed development outside of the plan that will endanger the plan's future success. Growth outside of the plan in one area will need to be absorbed by the rest of the region and inhibit the growth of other jurisdictions, in subsequent MTPs. And it is feared that much more than the CEQA benefits provided by the SCS will be needed to incentivize smart growth and adherence to the plan.

The centerpiece of the plan's natural resource element is the Rural Urban Connection Strategy. We cannot understate our praise for the work of the RUCS program since the last MTP in analyzing the broad range of factors that affect viability of the region's rural communities. And we commend RUCS's demonstration of the economic imperatives to preserve the regions agricultural base.

17-10

SACOG highlights performance in this area with the projection that, by 2035, 37,000 acres of agricultural land will be converted to urban development--compared to 200,000 acres converted since 1988, (despite a greater projected population increase by 2035). This is certainly a great departure from the past that we support. Clearly, RUCS is an innovative and impressive program, yet it is essentially an economic viability study for agriculture alone, and the sophisticated analysis does not extend equally to habitat impacts, or other ecosystem services (i.e. carbon sequestration, groundwater recharge).

For plant and wildlife habitat viability, the SCS relies mostly on the presumed completion of the region's Habitat Conservation Plans. But these plans, alone, do not address critical regional connectivity, and, in some cases, do not at this point show certainty of successful completion.

17-11

The total acreage of newly developed land in the SCS is generally represented to be 53,266-53,914 (EIR 2-25; 19-20). Within the newly developed areas, 36,392 acres of agriculture (MTP/SCS, 7-6), 5,602 acres of designated forest (EIR,4-44), and 37,681 acres of habitat are impacted (Table 7-5, MTP/SCS 7-17). Obviously, there are overlaps of these 79,675 acres of agriculture, forest, and habitat to add up to the ~53,500 figures. Table 6-6 (EIR, 6-35) adds up the impacts to 53,914 - showing only 16,233 acres of agriculture beyond the 37,000 of habitat. But how or where the other 24,000 acres overlap is not clearly indicated or shown spatially to be able to adequately analyze impacts.

Further, while SACOG has used the best data currently available, it is roundly recognized that comprehensive, accurate, up-to-date natural resource data does not exist for the region to do sufficient analysis of these impacts.

The lack of data is demonstrated by the plan's simple justification that the 37,500 acres of habitat impacted represents only "one percent of the 2,543,519 acres of habitat and land cover in the region today," (MTP/SCS, 7-16). However, the vast majority of this regional habitat resides in the National Forest in the mountains, while the vast majority of the impacts are in the valley and foothills where viable habitat differs greatly and is much more sparse. In the future, a proportionate analysis of habitat impacts on the valley must be undergone, at a regional level, to adequately assess environmental sustainability of the MTP/SCS.

17-11
Cont.

We believe that the interests of equity, public health, and economic prosperity in compact transit-oriented urban planning are best served by complimentary planning for natural resource and open-space conservation. Improved natural resource data, analysis and conservation strategies need to be developed to compliment the SCS, to further incentivize adherence to the valuable urban plan that SACOG has developed.

In the future, this data could be used:

- As a public decision-support tool for targeting responsible and efficient investment for development and conservation.
- To enable participation in/development of a Regional Advanced Mitigation Program
- To demonstrate co-benefits for ecology, public health, recreation and education, as well as the economic imperatives for habitat/open-space conservation
- To demonstrate co-benefits and economic imperatives to preserve ecosystem services, (ie. carbon sequestration, flood management and groundwater recharge)

Conclusion:

17-12

To reiterate, we applaud SACOG's first joint SCS/MTP, and we hope the above comments are constructive to implementation of the plan. We also commend the extensive efforts of SACOG staff to engage the public throughout the MTP process. We greatly appreciate the time and attention that has been provided us in addressing our concerns and suggestions in development of this plan, and we look forward to our continued work with SACOG moving forward.

Sincerely,



Jonathan Ellison, President
ECOS Board of Directors

RESPONSE TO LETTER 17 – Environmental Council of Sacramento (ECOS), Habitat 2020, and the California Heartland Project, Jonathan Ellison, ECOS Board of Directors

- 17-1. Thank you for supporting the anticipated outcomes of the MTP/SCS.
- 17-2. These introductory comments are noted.
- 17-3. The transportation investments in the MTP/SCS were tailored to the land use forecast for two years: 2020 and 2035. Phasing assumptions related to the amount and density of development were considered in the timing of transportation projects. In addition, the Regional Housing Needs Allocation process and the plan’s federal air quality conformity determination are directly tied to these land use and transportation phasing assumptions. Because of the many planning implications of these three plans, SACOG and our member and partner agencies worked very hard to estimate as accurately as possible the short-term (2020) and long-term (2035) growth patterns and transportation investments. Please also see Master Response E: Priorities and Financial Analysis.

However, SACOG agrees with the notion of improving coordination among agencies responsible for land use entitlements, transportation planning, and transportation service provision. To demonstrate this, a new strategy has been added to the MTP/SCS:

Strategy 29.5: Help facilitate improved coordination between transit agencies, public works departments and local land use authorities in planning new developments that are transit-, bicycle-, and pedestrian-supportive and timed so that new facilities and transit services are available at the time the new growth occurs.

- 17-4. This is an introduction to Comments 17-5 through 17-7 and no response is required.
- 17-5. The ULI report presents compelling information about the market demand in California’s largest metropolitan areas. The report also acknowledges that it “does not address whether and how the land use regulations of the state’s largest metropolitan areas can be restructured to facilitate planning and development processes that would allow absorption of this market demand.”¹ The report acknowledges that additional supply-side challenges must be overcome for the market demand it forecasts to be fully served, including local land use regulations and infrastructure constraints. Chapter 3, particularly pages 3-13 through 3-15 and 3-32, discusses a number of the challenges facing development in the region’s Centers and Corridors and Established Communities. These challenges include local regulations (e.g. zoning codes and parking standards) and insufficient infrastructure capacity, as well as other challenges such as transit funding, the dissolution of redevelopment, and financing. The confluence of these competing supply and demand factors is the MTP/SCS land use pattern, which by law must be based on a reasonable estimate of the amount, type, and location of growth in the region, taking into account market demand, regulatory conditions (local, state and federal), economic conditions, and infrastructure constraints.

¹ Nelson, Arthur C., p. 11.

The challenges described above should not be taken to mean that the SACOG region's housing market is not moving at all in the direction suggested in the ULI report. As many general plans and specific plans in the region have been updated recently, or are currently being updated, we are seeing a shift towards planning for more small-lot and attached housing and the MTP/SCS land use forecast reflects this change as well as the change in market demand that supports an increase in these housing types. Additionally, the forecast contained in this Draft MTP/SCS of 28% of new homes being large-lot single-family is lower than the 30% assumed in the visionary assumptions in Blueprint Project.

It is also important to note that the Developing Communities included in the MTP/SCS generally are quite different from the large-scale master planned communities typical of the last few decades. Consistent with Blueprint principles, many of them provide a wider range of housing choices, are often located adjacent to existing large job centers whose workers will benefit from nearby housing options, provide a local resident-serving mix of uses such as schools, parks, and retail, and typically have a pedestrian and bicycle network and at least options reserved for future transit. The plan also points out that Developing Communities face their share of challenges, including how much overall demand there will be in this Community Type and for the portion of housing that is more traditional, larger-lot single family stock.

As part of its ongoing monitoring activities and in preparation for the next MTP/SCS update, SACOG will track and document actual development activity to assess whether or not the housing mix and growth pattern of the MTP/SCS should be adjusted. This will be done both because federal and state regulations require it, and in order to determine how the trends identified in the ULI report are playing out in Sacramento region.

- 17-6.** We agree with the principle that educational materials about various development types are important. While we do not currently have a guidebook, we do have several tools available to help with education and visualization of development types. The land use types used in the Blueprint Project are the basis for all SACOG land use modeling. Information about those land uses is available on our website at: **<http://www.sacregionblueprint.org>**. Additionally, we have a number of civic engagement tools available on our website, including educational videos, power points, photo simulations, and a photo database where thousands of photos of hundreds of types of development can be found. This is on our website at: **<http://sacog.org/CivicEngagement>**. In addition, we will be working with local agencies to implement the MTP/SCS and will be considering refining tools for that effort. We appreciate the suggestion and will consider how this could fit into MTP/SCS implementation.
- 17-7.** We agree that these regional targets are difficult to consider at the project level. SACOG has a set of tools and methods that can evaluate land use, travel and GHG emissions at the plan or project level. We agree that we should engage the suggested stakeholders and other interested parties as we improve upon existing tools and develop new ones.

- 17-8.** For CEQA exemptions, Public Resource Code Section 21155.1 requires a legislative body to conduct a public hearing to find that a transit priority project meets all of the environmental criteria of subdivision (a), all of the land use criteria of subdivision (b), and at least one of the three criteria in subdivision (c) of that section. This means a thorough analysis of a proposed project needs to be conducted and then considered at a public hearing before a transit priority project can be declared a sustainable communities project. For Sustainable Communities Environmental Assessments (SCEAs), which are applicable to transit priority projects, Public Resource Code Section 21155.2(b) describes public comment periods for a draft SCEA, with notice provided in the same manner as required for an EIR pursuant to Section 21092. For EIRs applicable to transit priority projects and residential or mixed-use residential projects, the standard EIR noticing and public review periods would apply (CEQA Guidelines 15082(c), 15087, 15105(a), PRC 21092, CEQA Guidelines 15092).
- 17-9.** Thank you for supporting the growth footprint of the MTP/SCS. Only transit priority projects have the potential to receive CEQA exemption and then only if those projects are found consistent with the SCS and meet the criteria of PRC Section 21155.1 subdivisions (a), (b) and (c). Staff acknowledges the author's concern that there are many thousand acres of growth outside of the MTP/SCS growth footprint and the author's concern that such growth potential may undermine the performance of subsequent MTP/SCS. Such development trends are reviewed every four years when the MTP/SCS is updated. Staff also acknowledges the author's fear that more than SB 375 CEQA benefits will be needed to incentivize smart growth and adherence to the plan. SB 375 is one of several means to incentivize smart growth development patterns. The MTP/SCS includes several land use and environmental sustainability policies and strategies that describe SACOG's efforts to support, encourage, and provide incentives to smart growth through several means, including pursuing regulatory reform, continuing the Community Design Funding program, supporting other incentive programs, developing and sharing data and tools, and otherwise supporting local agencies in fostering successful smart growth development.
- 17-10.** Thank you for your comments supporting the RUCS project. The RUCS project is intended to be an economic and environmental sustainability strategy for rural areas. Given that agriculture is the main rural land use and economic activity in the SACOG region, the RUCS started with a focus on agricultural viability as its key objective and means to support the environmental benefits provided by open land.

In terms of habitat, open space and other ecosystem services (hereafter referred to as open space), SACOG has identified these topics for future work. While some open space research has been included in RUCS research to date (see Appendix E-2 of the MTP/SCS), SACOG intends to work with stakeholders to accomplish two goals related habitat and open space: 1) develop a richer understanding of the parks and open space challenges and opportunities in the region and 2) build data and modeling tools that help the region use better information for better decision making. Among the data development opportunities is an inventory of existing data on recreational and open space lands, which could be assembled and analyzed for gaps. Other important outcomes of the

open space research will be the identification of ecosystem services provided by open lands. Examples of these services include flood control, groundwater recharge, and carbon sequestration. However, development of new tools and analyses will require additional revenues beyond SACOG's existing budget. SACOG is actively seeking funds to pay for a number of activities related to broadening the work of the RUCS project, including scoping a regional open space plan, but the extent of this work is, in part, dependent on the level of additional funding SACOG is able to secure.

- 17-11.** The SCS does aim to support the region's HCP planning efforts but it does not rely on the completion of those HCPs to mitigate for environmental impacts. Federal and state laws require every land development and transportation project to mitigate the effects on sensitive habitat and open space, regardless of whether or not an HCP is in effect. The land use forecast of the MTP/SCs considered the uncertainties associated with these HCP planning efforts and the DEIR mitigation measures for biological impacts are designed to mitigate impact with or without the presence of an adopted HCP.

SACOG agrees that the data sources appear to overlap. As a result the DEIR may overestimate the impacts of the proposed project in some areas. As suggested by the commenter it is likely there will be additional new and more detailed biological resource data available for the next MTP/SCS update and SACOG will use the best available data at that time for subsequent impact assessments.

- 17-12.** These concluding comments are noted. SACOG appreciates, and thanks you for, your support of and participation in the MTP/SCS and DEIR process.



January 9, 2012

The Honorable Susan Peters
 Chair, SACOG
 1415 I Street, Suite 300
 Sacramento, CA 95814

RE: DEIR SCS/MTP 2035

Dear Chair Peters:

18-1

The following comments are on behalf of the North State Building Industry Association (NSBIA) on the Draft Environmental Impact Report (DEIR) for the 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy (2035 MTP/SCS).

18-2

The NSBIA was chartered in 1947 with a focus on representing homebuilders, land developers and light commercial builders before local and regional governments. For over sixty-years, we have worked with our local government partners in addressing issues of concern to our member companies. Of particular concern to our members are additional costs imposed by governmental legislative actions.

18-3

While we recognize that certain costs are needed, we strongly advocate for restraint in the imposition of new or expanded regulations or policies that will create additional costs to both residential and commercial development. Our concern is for the emerging areas labeled as "in infill" as well as the more traditional "suburban development."

The economics of development have changed in our region. Lease and sale rates for commercial properties have dropped considerably. Sales prices for new homes have dropped dramatically. Personal/family income and business incomes in most cases have declined.

In contrast, new and expanded governmental imposed costs (in aggregate at the federal, state, regional and local levels) have increased. The Federal and State governments to date do not know how to do anything but increase costs. Locally or in this case, regionally, imposed costs add further to the lack of financial

18-3
Cont. feasibility. Given our region's economic malaise, we would strongly suggest that the imposition of new and increased costs be restrained to the further extent possible.

Regards,



Dennis M. Rogers
Senior Vice President, Governmental and Public Affairs

RESPONSE TO LETTER 18 – North State Building Industry Association, Dennis M. Rogers, Senior Vice President, Governmental and Public Affairs

- 18-1.** SACOG appreciates, and thanks you for, your participation in the MTP/SCS and DEIR process.
- 18-2.** This introductory comment is noted and expanded upon in the following comment.
- 18-3.** SACOG agrees that costs associated with additional regulation can be a barrier to infill and economic development, particularly in this economic climate. SACOG supports and pursues regulatory reform at the national, state and local levels to support Blueprint and MTP/SCS implementation, as well as the overall economic health and vitality of the region. SACOG’s advocacy position on these matters is also documented in its state and federal advocacy principles (<http://www.sacog.org/about/advocacy/>).

In support of this advocacy, SACOG also monitors actual development activity as part of MTP/SCS implementation and monitoring. Soon after the MTP/SCS is adopted, the next plan cycle begins, following the same update process. Actual development activity is tracked and documented, data sources are refreshed, and new and better analytical tools are constructed, as the region collectively works to continually improve at understanding all of the complex dynamics that influence growth patterns and how to maximize the positive, and minimize the negative, consequences of growth. Information collected and analyzed from this process helps to inform what is working or not working to support infill and greenfield development in terms of governmental imposed costs and regulations.

With regard to infill development, or the areas the plan identifies as Centers and Corridors and Established Communities, we know that barriers to growth include limited public and private sector financing, especially in the short term given current lending practices and the uncertainty surrounding redevelopment caused by the most recent state legislation and pending litigation. In some cases, existing infrastructure capacity is not sufficient, and financing improvements can be challenging due to the multiple owners typically found in finer-grained urban lot patterns. Remediating contaminated soils and groundwater is another barrier on some of these lands. Additionally, many neighborhoods have arterials and local streets that experience significant traffic and congestion, need maintenance and rehabilitation, and lack attractive transit, pedestrian and bicycle facilities. Opportunities to incentivize housing and mixed use development near transit are offered in California under SB 375. With funding through the U.S. Department of Housing and Urban Development (HUD) from the Federal Partnership for Sustainable Communities, SACOG is conducting five case studies of transit-oriented development (TOD) to examine the barriers and opportunities for TOD in the region. The work is bottom-up, informed by the grant advisory group, the Regional Consortium for Sustainable Communities, including its four working groups on Equity, Housing & Health; Natural Resources; Infrastructure; and Economic Development. The Urban Land Institute Sacramento Chapter is a partner in this work and is providing case study reports

of each area, with recommendations for how the process can be replicated in similar types of communities in the region, state, and nation.

With regard to greenfield development, or the areas the plan identifies as Developing Communities, we know that there are different, but equally significant barriers to growth. A substantial question is just how much market demand there will be for the portion of housing that is more traditional, larger-lot single family stock. In the near term, a nine percent residential vacancy rate and large numbers of foreclosures provides significant competition for whatever demand there is for these traditional products. High infrastructure and service costs for roads, transit, water, sewer, drainage and schools, as well as costs for police, fire and other services, are a significant barrier to starting large-scale developments. Local government financial conditions create understandable pressures to set development fees at levels that cover the government's total upfront and ongoing costs, sometimes affecting the profitability and economic viability of the projects. This can be particularly challenging for the smart growth products in the lower price ranges, e.g., small-lot single family, row houses and townhomes. Additionally, the outcome of new flood mapping currently being conducted by FEMA in Yolo and Sutter counties could affect development in the early years of this plan within these two counties in particular. There are also significant issues related to the federal Endangered Species and Clean Water Acts, administered by the U.S. Fish and Wildlife Service and U.S. Army of Corps of Engineers, especially in and around the two largest suburban employment centers of the region in southwest Placer County and southeast Sacramento County along the U.S. 50 corridor. Substantial, multi-year efforts to develop Habitat Conservation Plans (HCPs) in these two areas designed to resolve the environmental protection and development pressure trade-off issues are ongoing, but not yet successfully completed.



January 9, 2012

VIA EMAIL

Matt Carpenter
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

**RE: Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035
Draft EIR (SCH 2011012081)**

Dear Mr. Carpenter:

19-1

Thank you for the opportunity to comment on the Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 Draft Environmental Impact Report. SACOG has produced an impressive MTP/SCS that includes increased investments in pedestrian and bicycle projects and programs even though overall funding is lower. The following comments pertain to impacts and mitigation measures in Chapter 16 Transportation.

Impact TRN-1: Cause an increase in vehicle miles traveled (VMT) per capita that exceeds the applicable baseline average.

19-2

The conclusion of the analysis is the VMT per capita impacts are less than significant and no mitigation is required. The declines in VMT per capita are attributed to six land use and transportation changes in the MTP/SCS. Four of those – compact land use, mixed-use development, concentrating development in high-quality transit corridors, and an emphasis on transit service and complete streets – reduce the VMT per capita by increasing transit, walk, and bike modes of travel and shorter-length vehicle trips.

VMT per capita may not accurately indicate transportation system efficiency. There is a significant percentage of the population that cannot drive or chooses not to drive. For example, the regional projections in Appendix D-1 of the MTP/SCS indicate that 45% of the population growth between 2008 and 2035 will be those 65 years of age and older. The rates of driving and automobile ownership rates for that age group will be lower than the regional average for all ages. Those people will not drive regardless of the transportation system. Including those people in the calculation of VMT per capita will skew the result toward a lower number. Will that effect be significant?

Mitigation Measure TRN –1: Implement transportation demand management and investment strategies to reduce congested vehicle miles traveled (C-VMT)

19-3 This mitigation measure makes suggestions for transportation demand management and investment strategies to reduce the congested vehicle miles traveled in Developing Communities that is 13% above the baseline regional average. Complete Streets can reduce congestion by allowing more people to travel on the street as more modes are utilized. Neighborhood schools can reduce local and arterial traffic by allowing more travel to schools without a car.

Add Complete Streets and neighborhood schools to Mitigation Measure TRN-1.

Impact TRN-3: Cause combined bicycle, walk, and transit person trips per capita to be lower than the applicable baseline average, and cause a decline in the bicycle, walk, and transit person trips per capita that exceeds the baseline regional average.

19-4 The MTP/SCS includes goals that generally consider each transportation mode independently, while the investments and performance indicators consider either transit, bicycle, or transit, walk, and bike. The DEIR combines walk, bike, and transit modes as a performance measure for non-private-vehicle modes, but doesn't consider the modes individually.

Appendix G, section XVI. Transportation/Traffic in the SB97 amendments to the CEQA guidelines checklist asks "Would the project: ... f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?" **[emphasis added]** Combining bicycle, walk, and transit into a single criterion obscures the positive or negative performance of each mode.

Impact TRN-3 should be expanded to analyze walk, bicycle, and transit modes separately for trips-per-capita performance.

19-5 The DEIR also does not analyze the performance of walk and bike plans in terms of health. Incorporating walking and biking into daily activity is critical to the health of people in the region. Benefits include decreased obesity, heart disease, and type 2 diabetes. More walk and bike trips mean fewer private vehicle trips, which means less air pollution and decreased lung-related health problems.

Impact TRN-3 should be expanded to analyze walk, bicycle, and transit mode performance for public health.

Impact TRN-5: Cause interference with existing or planned bicycle and pedestrian facilities.

19-6 By looking at only interference, this criterion for impacts doesn't fully address how bicycle and pedestrian facilities might be affected. The SB97 amendments to the CEQA guidelines checklist include performance and safety in addition to interference. Appendix G, section XVI. Transportation/Traffic asks "Would the project: ... f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise

decrease the performance or safety of such facilities?" [emphasis added] Impact TRN-3 attempts, inadequately, to assess the impact to performance, but neither TRN-3 nor TRN-5 assess the impact to the safety of the facilities.

Chapter 5 of the MTP/SCS, page 5C-6, calls attention to a study that found that people without safe places to walk within 10 minutes of home were about 40% less likely to meet recommended activity levels compared to people with safe places. On page 5C-7, the discussion of pedestrian and bicycle access to transit concludes that "Creating Safe Routes to Transit is a priority of the region" and safe access routes can enhance the appeal of walking, biking, and transit. One of the goals of the MTP/SCS, stated in the DEIR on page 16-33, is to "enhance the region's bike, walk and transit systems, and to promote growth and land uses that maximize the potential for shorter trips, which are more likely to be made by walking, biking or transit."

19-6

Cont.

How do we know if the safety of the pedestrians and bicyclists will be not be negatively affected by changes to the transportation system, whether those changes are to the motorized or non-motorized components of the system? While the region-wide mode share for walking is 6.6% (Table 5C.2), pedestrians accounted for 23% of traffic fatalities in Sacramento County from 2000-2009 (Dangerous by Design 2011 report by Transportation for America). We know that even though the bicycle mode share for all travel is 1.8% (Table 5C.2), bicyclist fatalities accounted for 4.2% of the SACOG region traffic fatalities compared to 3.2% statewide (page 10-17).

Impact TRN-5 should analyze the impact of the MTP/SCS to the safety of pedestrian and bicycle facilities.

WALKSacramento encourages people to walk and bicycle in their communities. The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality, and a stronger sense of cohesion and safety in local neighborhoods.

19-7

WALKSacramento is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling.

Sincerely,

Chris Holm
Project Analyst

WALKSacramento
909 12th Street, Suite #122
Sacramento, CA 95814

RESPONSE TO LETTER 19 – WalkSacramento, Chris Holm

- 19-1.** Thank you for your comments supporting the MTP/SCS and for your continued participation in this important process.
- 19-2.** It is true that age is a factor in the amount of vehicle travel a person generates, on average, and that older persons travel less compared to younger adults. It is also true that the proportion of older persons increases in the demographic forecasts utilized for development of the MTP/SCS. However, the effects of higher proportions of older persons accounts for a very small proportion of the overall reduction in VMT per capita.

Persons below driving age and in school generate less vehicle travel (even counting a share of auto passenger trips) because higher shares of trips are made by walk or bike, and most trips are very close to home. Older persons participate in less out-of-home activities than younger persons overall, and they generate less vehicle travel for that reason. The table below provides a tabulation of the household generated VMT reported in TRN-1, broken out by three age groupings (25 years or less, 26-65 years, and greater than 65 years). VMT rates for the youngest group is the lowest (about 9 miles per person per day), in part because this grouping includes school age children as well as young adults. The highest group is 26-65 years, with 27.9 in 2008 and 25.4 in 2035. The oldest group is generates about 14 miles per person per day, about one-half the mileage generated by those 26-65 years.

By applying the population proportions from the base year (i.e. lower portion of the population in the >65 years age category) to the per capita rates of 2035, and computing a weighted average, the “age effects” in the VMT reduction can be separated from the land use, transportation and other effects (i.e the overall decline for all categories). Using this synthetic calculation, the 2035 VMT per capita would be 17.8 miles, or 0.2 miles greater than the 2035 VMT per capita with the higher proportion of older persons. So, 0.2 miles of the overall 1.7 miles of per capita VMT reduction could be accounted for by “age effects”. The remaining 1.5 miles of per capita VMT reduction is accounted for by land use, transportation project, and other effects.

Vehicle Miles Traveled Per Capita by Age, 2008 and 2035 (Re: Comment 19-2)

Age Group	Population		Household Generated VMT		VMT Per Capita			Share of Pop		Share of VMT	
	2008	2035	2008	2035	2008	2035	Change from '08	2008	2035	2008	2035
<=25	841,179	1,022,599	7,694,700	8,862,900	9.1	8.7	-5.3%	38%	33%	18%	16%
26-65	1,133,211	1,456,373	31,644,500	37,043,800	27.9	25.4	-8.9%	51%	47%	74%	68%
>65	<u>240,654</u>	<u>607,241</u>	<u>3,305,500</u>	<u>8,311,200</u>	<u>13.7</u>	<u>13.7</u>	<u>-0.4%</u>	<u>11%</u>	<u>20%</u>	<u>8%</u>	<u>15%</u>
Total	2,215,044	3,086,213	42,644,700	54,217,900	19.3	17.6	-8.7%	100%	100%	100%	100%

Source: SACOG, January 2012. All estimates of travel from SACSIM11 regional travel demand model.

19-3. The requested references to complete streets and neighborhood schools have been added to Mitigation TRN-1. However, the conclusion that implementation of the mitigation measure cannot be required by SACOG is unchanged, and the impact remains significant and unavoidable.

19-4. The commenter requests that bike and walk trips be split out from the combined bike, walk and transit person trips currently used for evaluation of this potential impact. The table below provides the requested information. Per capita bike and walk trips increase in each community area type, and for the region as a whole. If the impact threshold for combined bike, walk and transit person trips were applied to bike and walk trips alone, the determination of no significant impact would not change.

The table also provides bike and walk trips per capita for the three Transit Priority Areas by county. Two of the three TPAs decline in per capita bike and walk trips, compared to 2008.

- In the Yolo County TPA, the decline is related to the unusually high per capita rate of biking and walking in Davis, but most of the 2008 to 2035 growth in Yolo County TPAs occurring in West Sacramento, where the rate of bike and walk trips is higher than regional average, but lower than Davis. This results in a computed decline, since very little growth occurs in the portion of the Yolo TPA in Davis. Even with this computed decline, the 2035 per capita rate (1.10) is nearly three times regional average in 2035 (0.41), and this would not be a significant impact even if only bike and walk trips were included in the impact threshold.
- In the Placer County TPA is located along Douglas Boulevard in the City of Roseville. It is the lowest density TPA of the three county-level TPAs and has the lowest rate of biking and walking in the base year. The overall increase in combined bike, walk and transit is driven by an increase in transit trip-making. However, the 2035 per capita rate (0.42) is still marginally higher than the regional average in 2035 (0.41), and this would not be a significant impact even if only bike and walk trips were included in the impact threshold.

19-5. The commenter cites examples of the health benefits of active transportation modes like biking and walking. SACOG acknowledges that these benefits occur and provides various health-related information in the Draft MTP/SCS on pages 7-20 through 7-41. Overall, the region will be generating less air pollution emissions per capita in the future than under current conditions, in part, because more people are walking and bicycling, which also affects their direct physical health. In future MTP/SCS updates, SACOG will seek means to further quantify these benefits. Please also see Response 3-2.

Bike + Walk Person Trips Per Capita

	2008	2035 MTP/SCS
<i>Community Type</i>		
Center & Corridor Communities	0.66	0.79
Established Communities	0.34	0.38
Developing Communities	0.20	0.24
Rural Residential Communities	0.16	0.19
Region Total	0.35	0.41
<i>Transit Priority Areas...</i>		
...in Placer County	0.46	0.42
...in Sacramento County	0.53	0.59
... in Yolo County	1.36	1.10

Source: SACOG, January 2012.

- 19-6.** The commenter notes that interference with existing or planned bike or pedestrian facilities is not sufficient to fully evaluate impacts of the plan on walking and bicycling in the region, and suggests adding another impact evaluation related to safety of pedestrians and bicyclists.

The commenter specifically cites portions of Appendix G from the CEQA Guidelines. As noted on the first page of Appendix G, this is just a sample form. Lead agencies are allowed to establish their own criteria and thresholds for impact analysis. For a regional plan such as the MTP/SCS, SACOG has established impact criteria and thresholds that reflect the goals and objectives of the MTP and the regional nature of the plan. While bicycle and pedestrian safety is important to SACOG, the agency is not directly responsible for the construction or implementation of individual transportation improvements. Overall, implementation of the MTP/SCS will result in a transportation network that is projected to have more walking and bicycling per capita as a direct outcome of the choices in the plan about land use development and transportation improvements. While detailed analysis of each individual transportation improvement is not included in the plan or program EIR, these projects will each be subject to project level CEQA review and will be constructed according to the applicable design standards of the agency responsible for construction. An essential role of design standards is to consider safety and operations for all users of the transportation network. Hence, no evidence is provided in the comment or is available in any other form to suggest that bicycle and pedestrian safety will be compromised by implementing the MTP/SCS. SACOG will re-evaluate the ability to prepare future year, regional impacts of the MTP/SCS on pedestrian and bicyclist safety in the next update of the MTP/SCS.

- 19-7.** This comment is noted. SACOG appreciates WalkSacramento’s efforts to encourage walking and bicycling in the region.

CHAPTER 4 – REVISIONS TO THE DRAFT EIR

This chapter includes the revisions to the Draft EIR. These revisions have been made in response to comments or are corrections identified by staff. Staff corrections include grammatical corrections and clarifications. None of the revisions have an impact on the analysis included in the EIR. The revisions appear in the order they appear in the Draft EIR. Text additions are noted in underline and text deletions appear in ~~strikeout~~.

CHAPTER 2 - PROJECT DESCRIPTION

Table 2.15 on Page 2-40 has been revised as follows:

Table 2.15
Table of Illustrative Projects

NEW RAIL	
Rail	<ul style="list-style-type: none"> • Blue Line extension from Meadowview to Cosumnes River College • Capitol Corridor connecting Placer County, Sacramento, and Yolo Counties to the Bay Area • Green Line extension from Downtown Sacramento to Natomas Town Center <u>Sacramento International Airport</u> • Downtown Sacramento to West Sacramento streetcar starter, with Midtown loop extensions • Rancho Cordova Town Center Loop Streetcar • High Speed Rail – Altamont connection to points south, terminating at Sacramento Valley station
NEW BUS	
Local & Express Buses, Neighborhood Shuttles	<ul style="list-style-type: none"> • Increase bus service with 15 minute or better service from 14% in 2008 to 45%
Bus Rapid Transit (BRT)/ Hi Bus	<ul style="list-style-type: none"> • Nine BRT lines with 15-30-minute service connecting Roseville, eastern Sac County, Citrus Heights, northern Sac County, Natomas, Rancho Cordova, South Sac, Elk Grove, Downtown • Various street & operational improvements coordinated with complete streets corridor enhancements to enhance bus transit
NEW BIKE/PEDESTRIAN	
Bike Lanes, Complete Streets & Recreational Trails	<ul style="list-style-type: none"> • Increase of 7% per capita in travel mode expenditure from 2008 MTP. Emphasis on complete street connections within and between cities and to transit and school facilities

NEW ROADS	
US 50 El Dorado	<ul style="list-style-type: none"> • Carpool lane extension, Bass Lake Rd to Cameron Park Dr. • Carpool lane extension, Cameron Park Dr to Greenstone Rd. • New auxiliary lanes on US50 with connected parallel roads between El Dorado Hills and Shingle Springs • 4-lane Green Valley Road, Folsom to El Dorado Hills
US 50 Sacramento	<ul style="list-style-type: none"> • New carpool lanes, Sunrise Boulevard to Watt Ave • New carpool lanes, Watt Ave to downtown Sacramento • Modified interchange operational improvements at US50 & SR99, US50 & I-5 • New auxiliary lanes, various locations in Sacramento, Rancho Cordova, and Folsom

Figures 2.4 and 2.5 on pages 2-45 and 2-46 have been revised as follows:

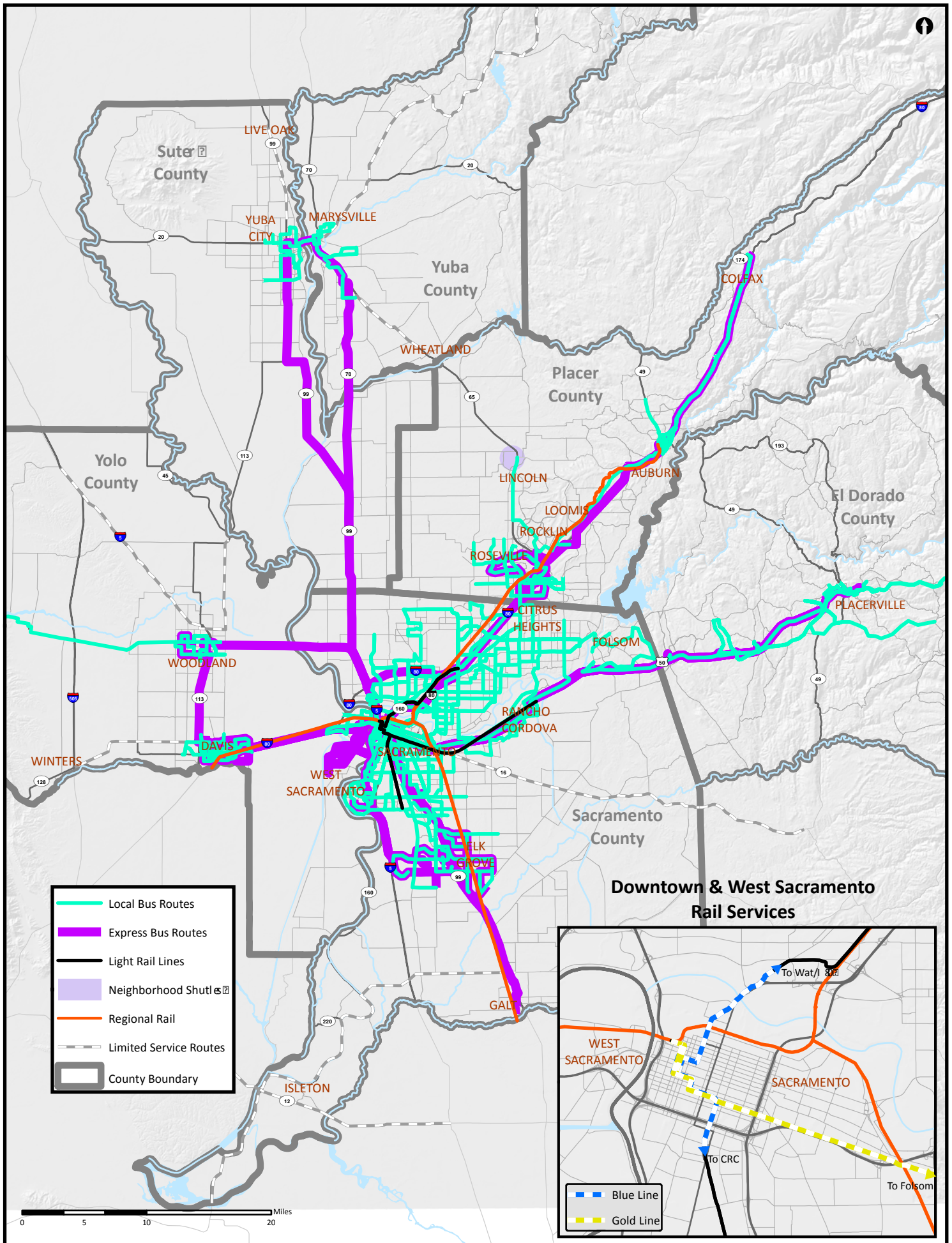


Figure 2.4 2008 Transit Network

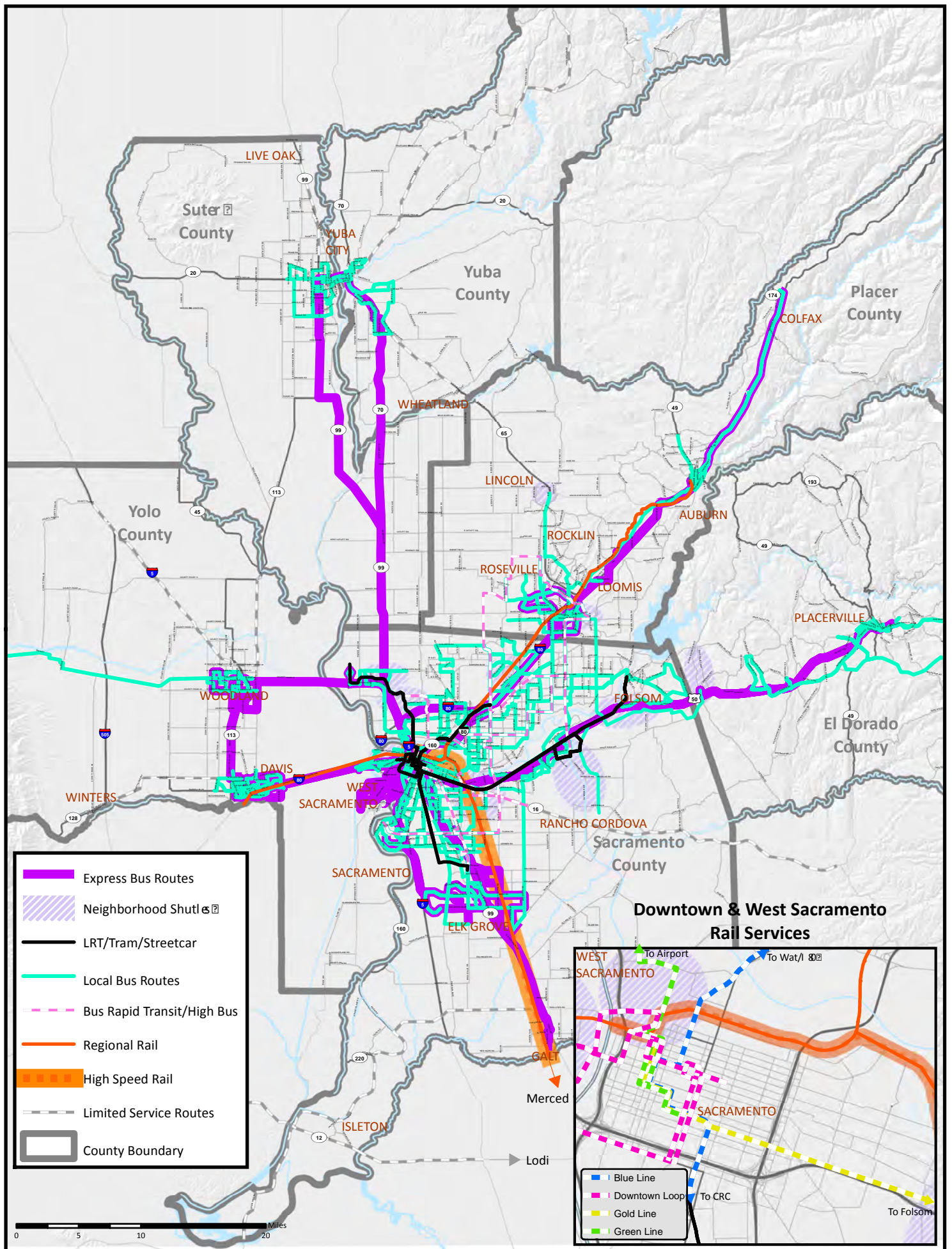


Figure 2.5 2035 Transit Network

CHAPTER 4 - AGRICULTURE AND FORESTRY RESOURCES

Mitigation Measure AG-1 on page 4-24 is revised to read as follows:

The implementing agency should mitigate for loss of farmland where appropriate and feasible by requiring permanent protection of in-kind farmland at a 1:1 ratio, in the form of easements, fees, or elimination of development rights/potential. This may include participation in an adopted HCP that protects equivalent farmland and does not preclude credit for “stacked” mitigation.

Mitigation Measure AG-3 on page 4-35 is revised to read as follows:

The implementing agency should mitigate for loss of forest land or timberland where appropriate and feasible by requiring permanent protection of in-kind land at a 1:1 ratio, in the form of easements, fees, or elimination of development rights/potential. This may include participation in an adopted HCP that protects equivalent farmland and does not preclude credit for “stacked” mitigation.

CHAPTER 5 - AIR QUALITY

Section “PM_{2.5}” on page 5-8 is revised as follows:

There are two nonattainment designations within the AQMA for PM_{2.5}. EPA changed the 24-hour standard for PM_{2.5} from 65µg/m³ to 35µg/m³ in 2006. The areas ~~failed~~ were designated nonattainment because they either exceeded to meet the new standards and or were consequently determined designated PM_{2.5} as nonattainment areas in 2009 by the EPA to contribute to exceedances of the standard.

Table 5.2 on page 5-9 is revised as follows:

Table 5.2

Existing Air Quality Monitoring Sites

Monitoring Sites	Operating Agency	Address
El Dorado County		
Big Hill Lookout Road	ARB	N/A; 2.6 miles west of Jones Place
Cool-Highway 193	ARB	1400 American River Trail
Echo Summit	ARB	U.S. 50 Echo Summit
Placerville-Gold Nugget Way	ARB	3111 Gold Nugget Way
Placer County		
Auburn-Dewitt-C Avenue	PCAPCD	11484 B Ave DeWitt Cen.
Colfax-City Hall	PCAPCD	10 West Church Street
Rocklin-Rocklin Road	PCAPCD	5000 Rocklin Rd
Roseville-N Sunrise Blvd	ARB	151 North Sunrise
Sacramento County		
Elk Grove-Bruceville Road	SMAQMD	12490 Bruceville Road
Folsom-Natoma Street	SMAQMD	1300 Liedesdorff
North Highlands-Blackfoot Way	SMAQMD	Navajo Street
Sacramento-2221 Stockton Boulevard	SMAQMD	2221 Stockton Blvd.
Sacramento- 3847 Branch Center Road	SMAQMD	3847 Branch Center Rd.
Sacramento - Del Paso Manor	SMAQMD	2701 Avalon Street
Sacramento-Goldenland Court	SMAQMD	68 Goldenland Ct
Sacramento-T Street	ARB	1309 T Street
Sloughhouse	SMAQMD	7520 Sloughhouse Road
Solano County		
Vacaville-Elmira Road	YSAQMD	Elmira Road
Vacaville-Ulatis Drive	YSAQMD	Ulatis Drive
Sutter County		
Pleasant Grove-4 miles SW	ARB	7310 Pacific Avenue
Sutter Buttes-S Butte	ARB	Top of South Butte
Yuba City-Almond Street	ARB	773 Almond St
Yolo County		
Davis-UCD Campus	YSAQMD	U.C. Davis Ag. Station
West Sacramento-15 th Street	YSAQMD	132 W. 15 th Street
Woodland-Gibson Road	YSAQMD	17 W. Main Street

Source: ARB 2010

Table 5.3 on page 5-12 is revised as follows:

**Table 5.3
Number of Days Per Year Ozone Levels Exceeded State 8-Hour Standard**

Monitoring Sites	2002	2003	2004	2005	2006	2007	2008	2009	2010
El Dorado County									
Big Hill Lookout Road	*	45	0	*	*	*	*	*	*
Cool-Highway 193	97	63	50	56	75	44	40	35	18
Echo Summit	24	8	13	2	12	9	9	1	3
Placerville-Gold Nugget Way	63	59	38	48	63	20	52	32	19
Placer County									
Auburn-Dewitt-C Avenue	54	42	56	42	67	21	36	27	19
Colfax-City Hall	54	46	42	45	64	24	29	12	11
Rocklin-Rocklin Road	51	*	*	*	*	*	*	*	*
Roseville-N Sunrise Blvd	35	25	13	27	38	20	38	32	21
Sacramento County									
Elk Grove-Bruceville Road	3	27	10	22	32	13	13	12	6
Folsom-Natoma Street	60	58	41	41	62	34	65	47	26
North Highlands-Blackfoot Way	39	23	14	11	42	4	4	18	10
Sacramento-3801 Airport Road	13	7	2	8	13	8	15	*	*
Sacramento - Del Paso Manor	46	31	14	19	24	10	18	15	7
Sacramento-Goldenland Court	*	*	*	*	*	*	0	11	2
Sacramento-T Street	12	7	3	5	14	7	18	13	1
Sloughhouse	46	55	38	29	46	17	37	34	13
Solano County									
Vacaville-Elmira Road	6	2	*	*	*	*	*	*	*
Vacaville-Ulatis Drive	*	5	3	5	10	4	7	2	3
Sutter County									
Pleasant Grove-4 miles SW	17	*	*	*	*	*	*	*	*
Sutter Buttes-S Butte	35	32	24	19	43	19	27	7	3
Yuba City-Almond Street	9	18	5	7	13	6	2	1	1
Yolo County									
Davis-UCD Campus	7	8	6	6	9	4	10	7	3
Woodland-Gibson Road	21	20	3	13	23	5	12	11	0

Note: *There was insufficient (or no) data available for use to determine the value.

Source: ARB 2011b

Table 5.4 on page 5-13 is revised as follows:

**Table 5.4
Number of Days Above National 8-Hour Standard for Ozone**

Monitoring Sites	2002	2003	2004	2005	2006	2007	2008	2009	2010
El Dorado County									
Big Hill Lookout Road	*	25	0	*	*	*	*	*	*
Cool-Highway 193	77	44	27	39	55	29	29	21	6
Echo Summit	8	3	1	0	3	3	5	0	0
Placerville-Gold Nugget Way	41	40	24	31	45	9	36	20	8
Placer County									
Auburn-Dewitt-C Avenue	36	27	31	29	56	9	21	14	10
Colfax-City Hall	37	32	26	31	39	10	16	3	3
Rocklin-Rocklin Road	29	*	*	*	*	*	*	*	*
Roseville-N Sunrise Blvd	25	16	8	18	25	8	22	19	15
Sacramento County									
Elk Grove-Bruceville Road	2	14	6	12	17	5	7	5	2
Folsom-Natoma Street	40	42	23	30	42	21	50	35	19
North Highlands-Blackfoot Way	24	11	5	6	24	2	2	7	3
Sacramento-3801 Airport Road	6	3	0	3	5	4	9	*	*
Sacramento - Del Paso Manor	46	31	14	19	24	10	18	15	5
Sacramento-Goldenland Court	*	*	*	*	*	*	0	5	1
Sacramento-T Street	7	5	0	4	6	2	9	4	0
Sloughhouse	30	34	21	19	32	10	19	24	8
Solano County									
Vacaville-Elmira Road	2	0	*	*	*	*	*	*	*
Vacaville-Ulatis Drive	*	2	1	2	6	2	4	2	1
Sutter County									
Pleasant Grove-4 miles SW	12	*	*	*	*	*	*	*	*
Sutter Buttes-S Butte	19	22	12	5	23	7	12	2	0
Yuba City-Almond Street	9	18	5	7	13	6	2	1	0
Yolo County									
Davis-UCD Campus	4	5	0	3	4	3	5	1	0
Woodland-Gibson Road	13	10	0	6	14	2	4	3	0

Note: *There was insufficient (or no) data available for use to determine the value.

Source: ARB 2011b

Tables 5.5 and 5.6 on page 5-14 are revised as follows:

**Table 5.5
Number of Days Above National 8-Hour Standard for PM_{2.5}**

Monitoring Sites	2002	2003	2004	2005	2006	2007	2008	2009	2010
<i>El Dorado County</i>									
Big Hill Lookout Road	*	*	*	*	*	*	*	*	*
Echo Summit	*	*	*	*	*	*	*	*	*
<i>Placer County</i>									
Roseville-N Sunrise Blvd	19.7	0	0	6.1	11.5	0	6.5	0	0
<i>Sacramento County</i>									
Elk Grove-Bruceville Road	*	*	*	*	*	*	*	*	*
Folsom-Natoma Street	*	*	*	*	*	*	*	*	*
Sacramento - Del Paso Manor	*	13.9	13.1	18.3	19.3	26.1	24.1	8.9	0
Sacramento-Health Dept.- Stockton Blvd.	*	7.8	6.2	11.8	11.2	23.1	21.5	3.1	0
Sacramento-T Street	28.9	*	*	10.7	*	27.6	15.4	3	0
<i>Sutter County</i>									
Yuba City-Almond Street	6.1	0	12.2	11.5	16.2	8.1	9.7	2.1	1.1
<i>Yolo County</i>									
Davis-UCD Campus	*	*	*	*	*	*	*	*	*
Woodland-Gibson Road	3.4	0	3.4	0	12.3	15.1	*	0	0

Note: *There was insufficient (or no) data available for use to determine the value. Estimated days mathematically estimates how many days concentrations would have been greater than the level of the standard had each day been monitored, which can result in fractions of a day.

Source: ARB 2011b

Table 5.6
Estimated Number of Days Above the State 24-Hour Standard for PM₁₀

Monitoring Sites	2002	2003	2004	2005	2006	2007	2008	2009	2010
El Dorado County									
Big Hill Lookout Road	*	*	*	*	*	*	*	*	*
Echo Summit	0	0	*	*	*	*	*	*	*
Placerville-Gold Nugget Way	0	0	0	0	0	0	6.1	*	*
Placer County									
Rocklin-Rocklin Road	*	*	*	*	*	*	*	*	*
Roseville-N Sunrise Blvd	6.1	6.1	0	5.7	5.7	0	6.0	0	0
Sacramento County									
North Highlands-Blackfoot Way	*	*	0	42.3	17.9	13	*	0	0
Sacramento-3801 Airport Road	24.5	*	0	6.4	*	36.4	*	*	*
Sacramento-Branch Center Rd	*	24.5	0	23.6	*	*	*	*	*
Sacramento-Branch Center Rd #2	*	*	*	*	*	30.2	68.7	12.2	12.2
Sacramento-Del Paso Manor	29.5	12.2	6.1	29.4	40.2	30.2	12.1	0	0
Sacramento-Goldenland Court	*	12.1	0	*	*	25.1	13	0	0
Sacramento- T Street	18.4	6.1	*	24.4	*	30.2	17.8	6	6.1
Sacramento- Health Dept.-Stockton Blvd.	*	12.1	0	*	*	25.1	13.0	0	0
Solano County									
Vacaville-Merchant Street	6.1	0	0	0	6.1	0	6	0	*
Sutter County									
Yuba City-Almond Street	24.5	30.6	*	31	*	*	*	0	0
Yolo County									
West Sacramento-15th Street	18.8	*	6.1	29.9	53.3	32.4	31.6	12.1	6.1
Woodland-Gibson Road	36.8	*	79.5	6.1	36.8	18.7	48.9	12.2	6.5

Note: *There was insufficient (or no) data available for use to determine the value. Estimated days mathematically estimates how many days concentrations would have been greater than the level of the standard had each day been monitored, which can result in fractions of a day.

Source: ARB 2011b

Table 5.7 on page 5-15 is revised as follows:

Table 5.7
Estimated Number of Days Above the National 24-Hour Standard for PM₁₀

Monitoring Sites	2002	2003	2004	2005	2006	2007	2008	2009	2010
El Dorado County									
Big Hill Lookout Road	*	*	*	*	*	*	*	*	*
Echo Summit	0	0	*	*	*	*	*	*	*
Placerville-Gold Nugget Way	0	0	0	0	0	0	0	*	*
Placer County									
Rocklin-Rocklin Road	*	*	*	*	*	*	*	*	*
Roseville-N Sunrise Blvd	0	0	0	0	0	0	0	0	*
Sacramento County									
North Highlands-Blackfoot Way	*	0	0	0	0	0	*	0	0
Sacramento-3801 Airport Road	0	*	0	0	0	0	*	*	*
Sacramento-Branch Center Rd	0	0	0	0	*	*	*	*	*
Sacramento-Branch Center Rd #2	*	*	*	*	*	0	0	0	0
Sacramento - Del Paso Manor	0	0	0	0	0	0	0	0	0
Sacramento-Goldenland Court	*	*	*	*	*	*	*	0	0
Sacramento-Health Dept.- Stockton Blvd.	0	0	0	0	0	0	0	0	0
Sacramento-T Street	0	*	0	0	0	0	0	0	0
Solano County									
Vacaville-Merchant Street	0	0	0	0	0	0	0	0	0
Sutter County									
Yuba City-Almond Street	0	0	*	0	*	0	0	0	0
Yolo County									
West Sacramento-15th Street	0	0	0	0	0	0	0	0	0
Woodland-Gibson Road	0	0	6.1	0	0	0	6.1	0	0

Note: *There was insufficient (or no) data available for use to determine the value. Estimated days mathematically estimates how many days concentrations would have been greater than the level of the standard had each day been monitored, which can result in fractions of a day.

Source: ARB 2011b

Paragraph 2 on page 5-28 is revised as follows:

Aside from facilities easily identified as pollution sources, a facility can be deemed a public nuisance if it has a certain number of confirmed complaints regarding a specific incident over a given amount of time. The number of complaints and spans of time vary from district to district, with YSAQMD stipulating that five confirmed complaints from different households per incident constitutes a public nuisance not having a set quantitative threshold, and SMAQMD requiring one confirmed complaint per year averaged over a 3-year period or three unconfirmed complaints per year averaged over a 3-year period. Facilities/sources also can be considered a private nuisance, which does not call for interference from any of the air districts, even if they do not receive the minimum number of confirmed complaints. Rules and processes (e.g., permit requirements) vary by district. Additionally, individual districts can, and have, implemented recommended protocols for addressing TACs within their regions.

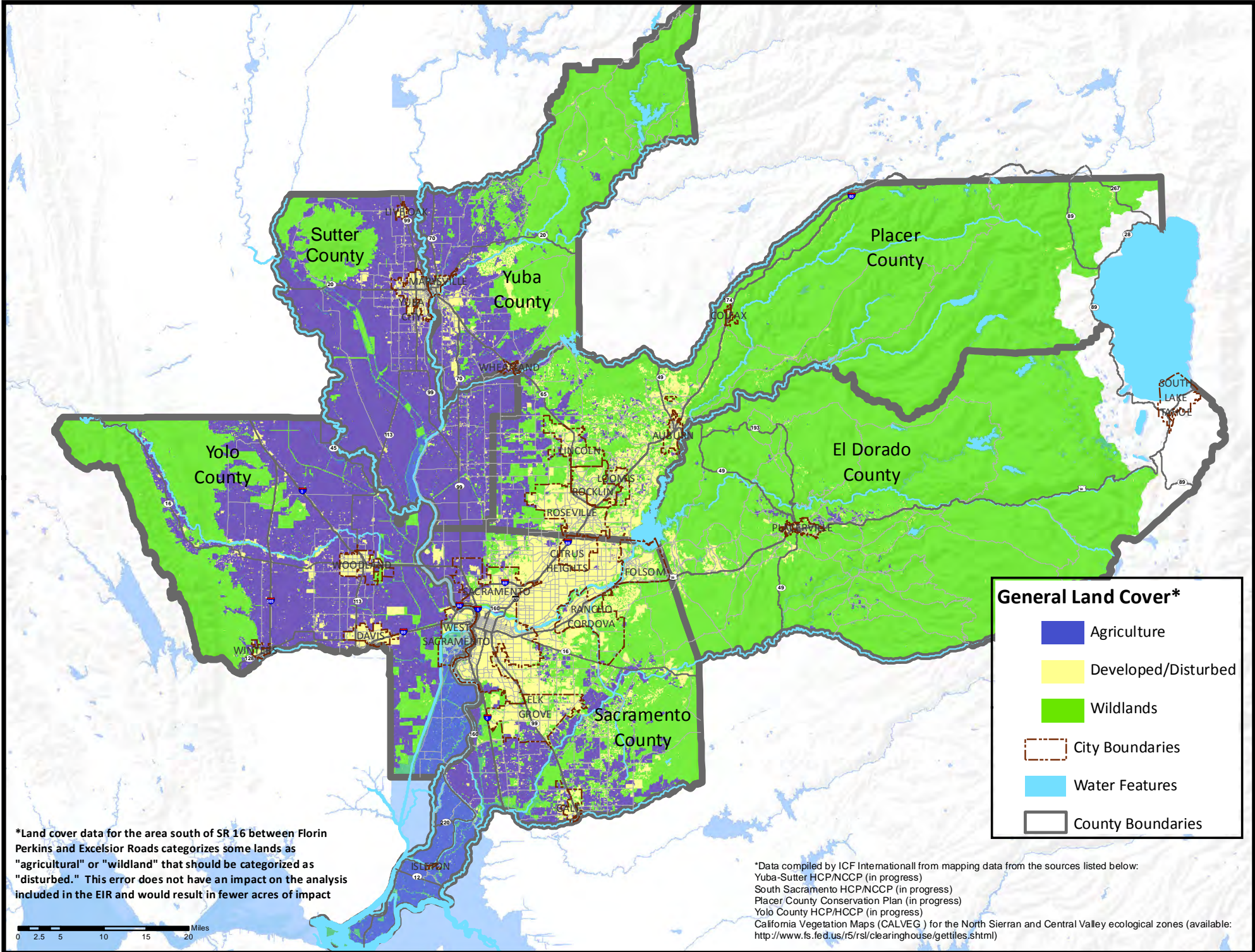
CHAPTER 6 - BIOLOGICAL RESOURCES

Paragraph 3 on page 6-1 has been revised as follows:

One comment regarding biological resources, submitted by Placer County Community Development/Resource Agency was received during circulation of the Notice of Preparation (NOP), requesting that the EIR for the proposed MTP/SCS recognize the work of the Placer County Conservation Plan in regards to natural resource conservation and land use planning in Placer County. This plan is discussed below when discussing HCPs and NCCPs.

Figure 6.1 on page 6-3 has been revised as follows:

Figure 6.1 General Land Cover in Plan Area



Page 6-27 has been revised to add:

Metro Air Park HCP

The Metro Air Park HCP was approved in 2002 and is administered by The Natomas Basin Conservancy (TNBC), TNBC is a nonprofit entity responsible for administering and implementing the Metro Air Park HCP, and reports directly to the permit holder. The Metro Air Park HCP covers a 2,015-acre area and has one permit holder, the Metro Air Park Property Owners Association. The HCP covers 14 sensitive species, which are included in Appendix BIO-1.

CHAPTER 7- CULTURAL RESOURCES

Table 7.2 on page 7-12 has been revised as follows:

**Table 7.2
Historic Districts Located in the MTP/SCS Plan Area**

City/Location	District Name	Listed in:		Determined Eligible for:		Recommended Eligible for NRHP or CRHR	Recognized as Historically Significant by Local Government
		NRHP	CRHR	NRHP	CRHR		
El Dorado County							
Echo Lake	El Dorado Wall Discontinuos District		X	X			
EldDorado National Forest	West Wright's Lake Tract Historic District		X	X			
Gold Hill	Wakamatsu Tea & Silk Farm Colony District	X	X				

Paragraph 3 on page 7-44 has been revised as follows:

For cultural resources, the HRI, ~~and the~~ DOE and NAHC (as described in the Setting section) are the primary sources used to gather information on known significant archaeological and architectural/built environment properties in the MTP/SCS plan area. In general ~~this~~ these data ~~was~~ were gathered at the county and city level. The exact locations of significant cultural resources in or near specific proposed project areas related to the proposed MTP/SCS are not known at this time. Consequently, impacts below have been assessed at the program-level and take into consideration possible impacts that may occur to known and unknown cultural resources in the MTP/SCS plan area as a result of future ground-disturbing activities related to proposed transportation improvements, including new roads, interchanges, widenings, and rail transit alignments, and proposed land use changes, including residential and commercial construction.

The third bullet of Mitigation Measure CR-2 on page 7-55 has been revised as follows:

- contact with Native American representatives including: a) consultation directly with the Tribal Historic Preservation Officer in lieu of the State Historic Preservation Officer for undertakings occurring on tribal lands or undertakings directly or indirectly affecting cultural resources on tribal lands; b) consultation with relevant tribal elders and preservation staff regarding any known ethnographic resources or traditional cultural properties including follow-up consultation as necessary; c) conduct additional tribal consultation for individual project sites identified as positive for cultural resources or where impacts are unavoidable;

Paragraph 3 of Mitigation Measure CR-2 on page 7-56 has been revised as follows:

If the archaeological survey and/or the records search indicate that unique archaeological resources, as defined (Pub. Resources Code, § 21083.2(g).), are located in the specific project area, mitigation measures shall be identified including one or more of the following:

- Avoidance through project redesign, data recovery excavation, and/or public interpretation of the resource;
- Incorporate known cultural sites into open space or other protected areas;
- Establish conservation easements for culturally significant prehistoric sites;
- Provide tribal representatives opportunity to monitor projects if excavation and data recovery are required for prehistoric cultural areas or in cases where ground disturbance is proposed at or near sensitive cultural resources.

CHAPTER 9 - GEOLOGY, SEISMICITY, SOILS AND MINERAL RESOURCES

The third bullet on page 9-11 has been revised as follows:

- Eldorado National Forest Area (1984);

CHAPTER 10 - HAZARDS AND HAZARDOUS MATERIALS

Paragraph 5 on page 10-31 has been revised as follows:

The U.S. Forest Service is responsible for fire prevention and suppression in the Eldorado National Forest, Tahoe National Forest and those privately-owned lands within the forest boundaries.

CHAPTER 11 - HYDROLOGY AND WATER QUALITY

Figure 11.3 on Page 11-10 has been revised as follows:

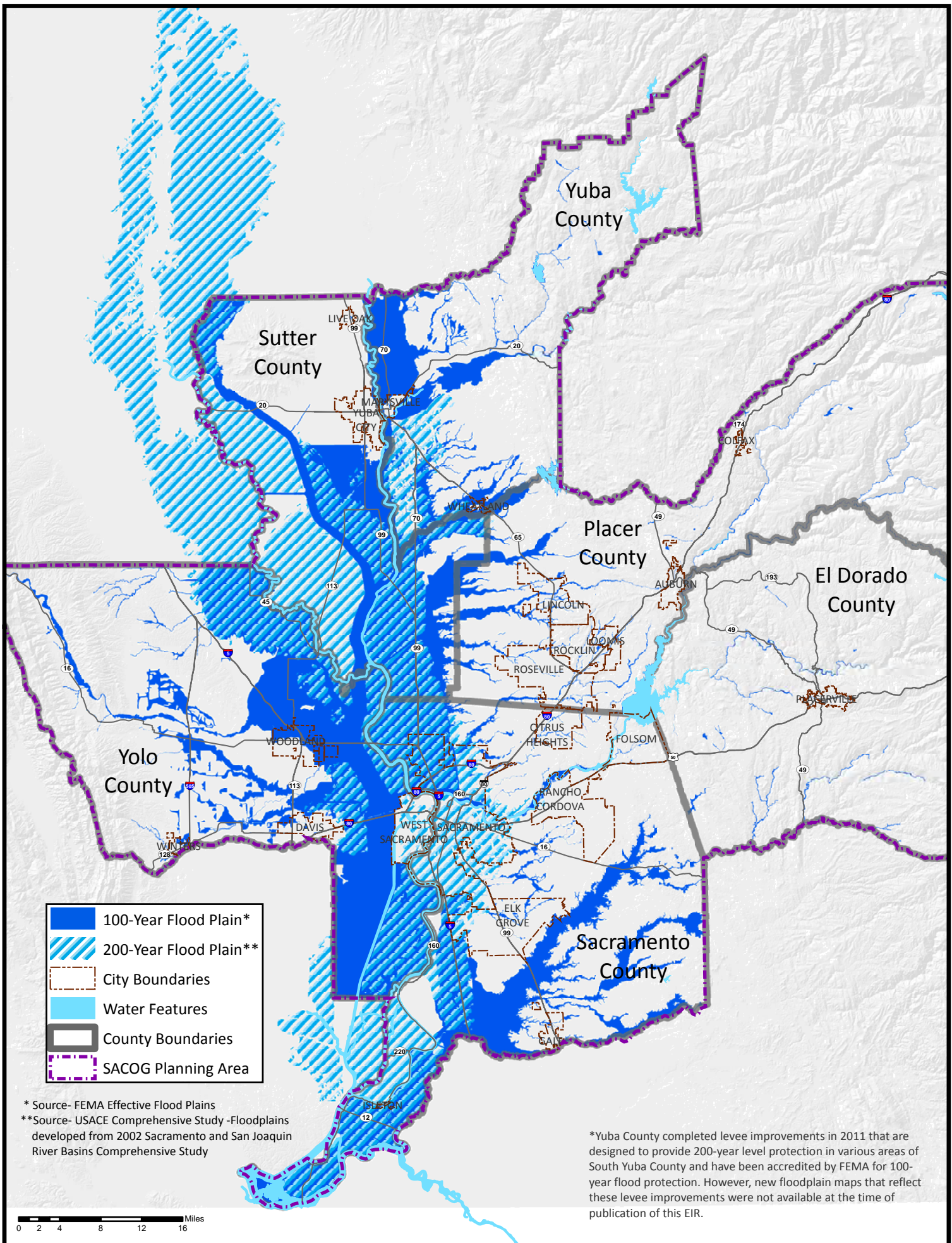


Figure 11.3 100-Year and 200-Year Flood Plains

Table 11.5 on Page 11-79 has been revised as follows:

Table 11.5
Proposed MTP/SCS Transportation Projects With Structures in a Floodplain

Floodplain		Improvement	Project Type
100-Year	200-Year		
X	X	New Southern Bridge: from Sacramento to West Sacramento across the Sacramento River. Includes: Auto, transit, bicycle and pedestrian facilities.	Bridge Project
X	X	East Commerce Way extension from planned Natomas Crossing Drive to San Juan Rd. as a 4 lane road.	Road Extension
X	X	El Centro Rd. new overcrossing	Highway Over/Undercrossing
X	X	Highway 99 Meister Way new overcrossing	Highway Over/Undercrossing
X	X	Extend Cosumnes River Boulevard from Franklin to Freeport with an interchange at I-5	Road Extension
X	X	New all-modal bridge: between downtown Sacramento and South Natomas across the Lower American River. Includes: Auto, transit, bicycle, and pedestrian facilities. Scale and features to be determined through need and purpose study anticipated to begin in 2012.	Bridge Project
X	X	Main Ave. extension: 2 lanes from Rio Linda Blvd. to Marysville Blvd.	Road Extension
X	X	Natomas Crossing Dr. new overcrossing	Highway Over/Undercrossing
X	X	Natomas Crossing Drive: new 2 lane road from Duckhorn Drive to El Centro Rd.	Road New
X	X	Snowey Egret Wy.: new overcrossing for planned road that will run east-west from El Centro Rd. to Commerce Wy. crossing over I-5.	Highway Over/Undercrossing
X	X	Sutter's Landing Parkway: New Road: 1.6 mile 4-lane arterial on new alignment between Hwy. 160 and Hwy. 51. Includes: sidewalks and bike lanes in both directions, a grade separation with the railroad, and a full interchange at the connection with Hwy. 51.	Road New
X	X	Elkhorn Blvd.: new 2 lane road from Airport Blvd. / Crossfield Dr. to Power Line Rd.	Road New
X	X	Meister Way Rd.: new 4 lane road from Metro Air Pkwy. to Lone Tree Rd.	Road New
X	X	Meister Way Rd: 4 lane road from Lone Tree Rd. to Hwy. 99.	Road New
X	X	Metro Air Parkway: from north of I-5 to Elverta Road: Construct and widen roadway from 2 to 4 lanes	Road Widening
X	X	Metro Air Parkway Interchange at I-5 Phase I: partial clover interchange; three lane overcrossing facility with a median, bike lanes and a sidewalk on the west side. Metro Air Parkway will connect on the north of the interchange and terminate south of I-5 with a cul-de-sac. South Bayou Rd will realigned to provide the r/w for partial completion of two-quadrant partial cloverleaf interchange.	Highway Interchange New/Improved
X	X	SR 99 Elverta Road new interchange: bridge structure to accommodate 10 lanes, with sidewalks and bike lanes on both sides	Highway Interchange New/Improved
X	X	SR-99 / Riego Road Type L-9 Interchange (partial cloverleaf) in Sacramento and Sutter Counties	Highway Interchange New/Improved
X	X	SR-99/113 Interchange (Sutter County)	Highway Interchange New/Improved
X	X	Goldfields Parkway: 2 lane extension of regional arterial from Orchards Subdivision to North Beale Road	Road Extension
X	X	Plumas Arboga Rd.: Widen 2 to 3 lane collector from Feather River Blvd. to Arboga Rd.	Road Widening
X	X	River Oaks Blvd: new 4 lane modified arterial from Algodon Rd to Draper Ranch South development.	Road New

Floodplain		Improvement	Project Type
100-Year	200-Year		
X	X	River Oaks Blvd.: extension: 2 inner lanes of 4-lane arterial from Feather River Blvd. to Lateral 16.	Road Extension
X		I-5 / 113 Connector Phase 2 (NB I-5 to SB SR 113 freeway to freeway connection)	Highway Interchange New/Improved
X		Dominguez Road extend with 2 lanes from Granite Drive to Sierra College Boulevard, including new bridge over I-80 in Rocklin	Road Extension
X		Valley View Parkway: Construct 2 lanes from Park Drive to Sierra College Blvd.	Road New
X		Whitney Ranch Parkway, construct new 4-lane facility from east of Wildcat Blvd. to Whitney Oaks Dr.	Road New
X		N. Watt Avenue Extend four lanes from Baseline Road to Blue Oaks Avenue (Roseville)	Road Extension
X		Foothills Blvd.: Construct as a 2 lane road from the City of Roseville to Sunset Blvd.	Road New
X		Widen Sunset Boulevard from State Route 65 to Cincinnati Avenue from two to four lanes. Project includes widening Industrial Blvd / UPRR overcrossing from two to four lanes.	Road Widening
X		Placer Parkway Phase 1: new 4-lane divided facility with I/C at SR 65 "Whitney Ranch" and at grade crossings at Fiddymont and Foothills from SR 65 to Watt Ave.	Road New
X		Route 65 Lincoln Bypass Phase 1: Construct Lincoln Bypass Phase 1: a 4-lane expressway on a new alignment from Industrial Avenue to north of North Ingram Slough and continue north with 2 lanes to Sheridan. Also design and construct a Park and Ride facility at SR 65 Bypass and Industrial Avenue.	Road Realignment / Bypass
X		East Natoma Street Widening: from Fargo Way to Folsom Lake Crossing: widen from 2 to 4 lanes and construct bicycle trail undercrossing in Folsom	Road Widening
X		Amador Ave. extension: 2 lanes from Carol Dr. to Cedar Flat Ave.	Road Extension
X		University Avenue - Phase 1: new four lane roadway from the intersection of Whitney Ranch Parkway north to the extension of West Oaks Drive.	Road New
X		Waterman Road Widening existing roadway to 4 lanes and extend roadway from Gerber Road to Florin Road with an at-grade rail road crossing.	Road Widening
X		Waterman Road Widening: Between Florin Rd. to Jackson Rd.; construct roadway to 4 lanes	Road Widening
X		Zinfandel Drive Extension: new two-lane road extension with the installation of a new traffic signal at the intersection of Zinfandel Drive/Eagles Nest Road and Douglas Road and reconstruct/realign Eagles Nest Road approximately 1,000 feet south from the new Zinfandel Drive and Douglas Road intersection.	Road Extension
X		Feather River Parkway: new alignment for SR-70 and SR-20 through the City of Marysville, creating a new alignment from 3rd Street westward towards the levee just north of Binney Junction, reconnecting to SR-20 and continuing to reconnect with SR-70 north of town	Road Realignment / Bypass
X		New Northern Bridge: from Sacramento to West Sacramento across the Sacramento River. Includes: Auto, transit, bicycle and pedestrian facilities.	Bridge Project

Paragraph 1 on page 11-81 has been revised as follows:

Like Center and Corridor Communities, Established Communities are already urbanized, but at a lower average density. Housing units will increase by approximately 79,000, but will decrease in proportional share from 77 percent to 64 percent. Established Communities in Sacramento County will add 16,599 housing units in the 200-year flood hazard area. Yolo County will add 791 housing units in the 200-year flood hazard area. Yuba County will add 1,702 housing units in the 200-year flood hazard area, although this number may be considerably lower, due to recent

levee improvements in a portion of the county that are not yet available in the official state data source used for this analysis. Specifically, the communities of Linda and Olivehurst may now have 200-year level protection and as such would not experience growth delays due to flood control issues. This growth pattern is consistent with the policies of the 2008 MTP and Blueprint, which call for a more compact regional growth footprint.

Paragraph 2 under “Developing Communities” on page 11-82 has been revised as follows:

Developing Communities in Sacramento County will add 5,350 housing units in the 200-year flood hazard area. Sutter County will add 3,475 housing units in the 200-year flood hazard area. Yolo County will add 954 housing units in the 200-year flood hazard area. Yuba County will add 5,926 housing units in the 200-year flood hazard area, although this number may be considerably lower, due to recent levee improvements in a portion of the county that are not yet available in the official state data source used for this analysis. Specifically, the communities of Plumas Lakes and areas north of Wheatland in the Highway 65 corridor may now have 200-year level protection and as such would not experience growth delays due to flood control issues.

Paragraph 2 under “Developing Communities” on page 11-93 has been revised as follows:

Developing Communities in Sacramento County will add 5,350 housing units and 2,175 jobs in the 200-year flood hazard area. Sutter County will add 200-year flood hazard area. Yolo County will add 954 housing units and 47 jobs in the 200-year flood hazard area. Yuba County will add a maximum of 5,926 housing units and 3,478 jobs in the 200-year flood hazard area. Recent levee improvements in southern Yuba County are designed to provide 200-year flood protection and may result in less or no exposure to flood hazards.

Table 11.6 on Page 11-108 has been revised as follows:

**Table 11.6
Proposed MTP/SCS Transportation Projects Crossing Impaired Bodies of Water**

Improvement	Type	Impaired Water Body
Latrobe Rd/White Rock Rd Connector (New Road)	Road New	Carson Creek (from wastewater treatment plant to Deer Creek)
I-5 and I-80 HOV Connectors and Lanes to Downtown	Highway HOV Lanes	American River, Lower
I-80 HOV Across the Top (Longview Drive to Sacramento River)	Highway HOV Lanes	Sacramento River (Knights Landing to the Delta)
SR 51 Transition Lane (American River Bridge to Exposition Boulevard)	Highway Auxiliary Lanes	American River, Lower
SR 51 Transition Lane (Exposition Boulevard to E Street)	Highway Auxiliary Lanes	American River, Lower
Wilton Rd (Grant Line Road to City limit)	Road Widening	Deer Creek (Sacramento County)

Improvement	Type	Impaired Water Body
Lower American River Crossing	Bridge Project	American River, Lower
Main Ave. (Sacramento City limit to Norwood Avenue)	Road Widening	Natomas East Main Drainage Canal (Steelhead Creek, downstream of confluence with Arcade Cr.)
Sutter's Landing Bridge	Bridge Project	American River, Lower
Elkhorn Blvd. (Sacramento City limit to Watt Avenue)	Road Widening	Natomas East Main Drainage Canal (Steelhead Creek, downstream of confluence with Arcade Cr.)
Elverta Road (Rio Linda Boulevard to Sacramento International Airport)	Road Widening	Natomas East Main Drainage Canal (aka Steelhead Creek, downstream of confluence with Arcade Cr.)
Hazel Ave Widening, Phase 1 (US 50 Interchange to Curragh Downs Drive)	Road Widening	American River, Lower
Sunrise Blvd. (Madison Avenue to Gold Country Boulevard)	Road Widening	American River, Lower
Winding Way (Auburn Boulevard to Garfield Avenue)	Road Widening	Arcade Creek
I-80 / U.S. 50 Bus/Carpool Lanes (Mace Boulevard in Davis to Downtown Sacramento)	Highway HOV Lanes	Tule Canal; Sacramento River (Knights Landing to the Delta)
Sacramento River Crossing (Sacramento to West Sacramento)	Bridge Project	Sacramento River (Knights Landig to the Delta)
Sacramento River Crossing (Sacramento to West Sacramento)	Bridge Project	Sacramento River (Knights Landig to the Delta)
Sutter SR-99 Corridor Widening (Nicholas Avenue/Garden Highway to Sacramento Ave.)	Highway Capacity	Feather River, Lower (Lake Oroville Dam to Confluence with Sacramento River)
Pease Rd. (North Township Road to SR 99)	Road Widening	Live Oak Slough
Riego Rd Widening (SR 99 to Placer County)	Road Widening	Main Drainage Canal
SR 20 10th St. Bridge Improvements	Bridge Project	Feather River, Lower (Lake Oroville Dam to Confluence with Sacramento River)
Feather River Bridge at 5th St (SR 99 to SR 65/70)	Bridge Project	Feather River, Lower (Lake Oroville Dam to Confluence with Sacramento River)
Lake Washington Blvd. (Jefferson Boulevard to Palamidessi Bridge)	Road Widening	Sacramento Deep Water Ship Channel
South River Rd. (US 50 on-ramp to Stonegate Drive)	Road Widening	Sacramento River (Knights Landing to the Delta); Sacramento Deep Water Ship Channel
Feather River Parkway (3rd Street to SR 70)	Road Realignment /	Feather River, Lower (Lake Oroville Dam to

Improvement	Type	Impaired Water Body
	Bypass	Confluence with Sacramento River)
Wheatland Pkwy. (Future north terminus of SR 65 to SR 65 near South Beal Road)	Road Realignment / Bypass	Bear River, Lower (below Camp Far West Reservoir)
Route 70 at Feather River Blvd. (SR 70 / Feather River Boulevard interchange)	Highway Safety, Operations & ITS	Bear River, Lower (below Camp Far West Reservoir)

CHAPTER 12 - LAND USE AND PLANNING

Section “U.S. Forest Service (USFS) on page 12-13 has been revised as follows:

The USFS is responsible for the management of large areas of national forest land. National forests are primarily managed for outdoor recreational uses and for resource preservation by the USFS. ~~The Eldorado National Forest in Placer and El Dorado Counties is and Tahoe National Forest are~~ under USFS jurisdiction.

CHAPTER 15 - PUBLIC SERVICES AND RECREATION

Section “U.S. Forest Service” on page 15-12 is revised as follows:

USFS is responsible for fire prevention and suppression in the ~~Eldorado National Forest, Tahoe National Forest~~ and those privately-owned lands within the forest boundaries.

Last Paragraph on page 15-17 is revised as follows:

There are three wilderness areas within the two National Forests: Granite Chief Wilderness (Tahoe National Forest), Desolation Wilderness (Eldorado National Forest), and Mokelumne Wilderness (Eldorado National Forest). All three of these wilderness areas are outside the MTP/SCS plan area. There are no national parks in the MTP/SCS plan area.

CHAPTER 16 - TRANSPORTATION AND TRAFFIC

Mitigation Measure TRN-1 on page 16-48 has been revised as follows:

In order to reduce the impact of congested vehicle miles traveled (C-VMT) in Developing Communities, one or more of the following transportation demand management and investment strategies should be considered for implementation in these areas.

- Promote ride sharing programs by methods that may include designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles;
- Provide public transit incentives such as free or low-cost monthly transit passes;

- Incorporate bicycle lanes and routes into street systems, new subdivisions, and large developments;
- Provide adequate infrastructure for all modes of transportation, including bicycle and pedestrian infrastructure, by incorporating complete streets principles into roadway design;
- Incorporate Neighborhood Electric Vehicle (NEV) lanes and supportive design features into street systems, new subdivisions, and large developments;
- Incorporate bicycle-friendly intersections into street design;
- For commercial projects, provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience. For large employers, provide facilities that encourage bicycle commuting, including, for example, locked bicycle storage or covered or indoor bicycle parking;
- Create walking paths in the location of schools, parks and other destination points;
- Work with the school district to provide neighborhood schools that facilitate walking and biking to school from nearby neighborhoods;
- Work with the school district to create and expand school bus services;
- Institute a telecommute work program. Provide information, training, and incentives to encourage participation;
- Create unique transportation incentives such as free bikes or carpool concierge services;
- Provide shuttle service and/or funding for a shuttle for residents that are outside of walking distance from a transit line;
- Incorporate Complete Streets features into street design; and/or
- Provide sites for and encourage the siting of neighborhood schools.

First and second bullets in paragraph 1 on page 16-61 have been revised as follows:

In terms of transportation investments, the proposed MTP/SCS invests in a number of improvements to the transportation system in the plan area. These investments include \$4.0 billion (escalated) in exclusively bicycle and pedestrian investments and additional bicycle and pedestrian infrastructure as part of roadway projects in the MTP/SCS. An estimated 20-30 percent of roadway projects in the MTP/SCS include bicycle and pedestrian improvements and all projects awarded funds managed by SACOG are anticipated to maintain or improve bicycle and pedestrian travel. Despite this policy support for bicycle and pedestrian travel, some of these roadway projects in the MTP/SCS may interfere with the existing or planned bicycle or pedestrian system. Interferences may include:

- Roadway improvement projects or land use changes which result in higher vehicle volumes or speeds adjacent to Class 1, ~~or~~ Class 2, or Class 3 bike routes;
- Roadway improvement projects that eliminate Class 1, ~~or~~ Class 2, or Class 3 bike routes;
- Projects that make pedestrian or bicycle traffic crossing roadways more difficult by increasing roadway width or resulting in higher volumes of vehicles;
- Projects that interfere with the right-of-way or construction of future planned bike or pedestrian facilities, including Class 1 bike routes; and
- Other projects which may interfere with or interrupt bike routes or pedestrian facilities.

Paragraph 1 on page 16-63 has been revised as follows:

Strategies in support of proposed MTP/SCS policies 13, 27, and 29 emphasize the importance of bicycle and pedestrian travel for local, regional, state and federal investment priorities. MTP/SCS policy 31 ensures that SACOG’s Regional Bicycle and Pedestrian Funding Program continues to provide funding for bicycle and pedestrian travel. Individual projects should be reviewed carefully as any hindrance to pedestrian travel that may block or cause a detour of a direct path may cause significant ramifications for a neighborhood.

Mitigation Measure TRN-3 on page 16-70 and 16-71 has been revised as follows:

The implementing agency should implement some or all of the following strategies in order to reduce the localized transportation system impacts from construction activities.

- Apply special construction techniques (e.g., directional drilling or night construction) to minimize impacts to traffic flow and provide adequate access to important destinations in the area.
- Develop circulation and detour plans to minimize impacts to local street impacts from construction activity on nearby major arterials. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
- Establish truck “usage” routes that minimize truck traffic on local roadways to the extent possible.
- Schedule truck trips outside of peak morning and evening commute hours.
- Limit the number of lane closures during peak hours to the extent possible.
- Identify detours for bicycles and pedestrians in all areas potentially affected by project construction and provide adequate signage to mark these routes.
- Install traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
- Develop and implement access plans for potentially impacted local services such as police and fire stations, transit stations, hospitals, schools and parks. The access plans

should be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions should be asked to identify detours for emergency vehicles, which will then be posted by the contractor.

- Store construction materials only in designated areas that minimize impacts to nearby roadways.
- Coordinate with local transit agencies for temporary relocation of routes or bus stops in works zones, as necessary.
- Provide a shuttle to detour travelers around road blocks.
- Conduct a public information campaign about how to use transit and other methods to reduce single-occupant vehicle use.

CHAPTER 17 - UTILITIES AND SERVICE SYSTEMS

Page 17-3, “Grizzly Flats Community Services District” section has been revised as follows:

The Grizzly Flats Community Services District is located in the foothills of the Sierra Nevada Range, southeast of Placerville, CA. The District has the responsibility of providing treated water for domestic use and fire protection to the residents within its service area. The District obtains its water supply by direct diversion of steam flows from North Canyon and Big Canyon Creeks, which are tributaries to the North Fork Consumnes River. The service area abuts the Eldorado National Forest. Approximately 1,228 parcels exist in the service area. The district has about 600 residential customers (Grizzly Flats Community Services District, 2011).

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