



**Community Development**

311 Vernon Street  
Roseville, California 95678-2649

December 20, 2007

MTP Comments  
1415 L Street, Suite 300  
Sacramento, CA 95814

Via: *Fax and Email*

Fax No. (916) 321-9551  
Page 1 of 2

**Subject: 2035 MTP DEIR COMMENTS**

Dear Sirs:

Thank you for the opportunity to review and comment on the 2035 MTP Draft EIR. The Draft EIR was routed to various City Departments for review. The following comments are provided for consideration and response in the 2035 MTP Final EIR:

- 2-1 [ 1. The Transportation Control Measures (TCM's) adopted in the SIP are legally binding and cannot be removed. As such, 2035 MTP EIR mitigation measures should be consistent with the SIP measures.
- 2-2 [ 2. Are the proposed TCMs actually "reasonably available control measures" according to Section 172 of the Clean Air Act?
- 2-3 [ 3. The document should identify and summarize the USEPA project substitution process, in case an adopted TCM is ultimately found to be infeasible.
- 2-4 [ 4. What happens in the case of a conflict between the adoption of TCMs in the SIP and CEQA requirements for public review of proposed mitigation measures as part of SACOG's EIR on the draft MTP (note: the proposed TCMs are listed in the draft EIR and the SIP as proposed mitigation measures).
- 2-5 [ 5. Under the Complete Streets Policy, the lack of inclusion of all modes of transportation on one project where it is not feasible (in the infill area for example) should not affect funding of other projects where complete streets consideration and design has been obtained. The document should be clear as to where and what programs this applies to, including feasibility. The measure references the Caltrans Directive 64 and the United States Department of Transportation Policy Statement on "Accommodating Bicycles and Pedestrians in Transportation Projects". The document should state what applies in the case of a conflict between these documents.
- 2-6 [ 6. The complete streets technical Assistance Program should take advantage of existing programs through ITE, TRB, TCRP, Dan Burton, etc.

- 2-7 [ 7. Several of the measures call out specific funding amounts, such as \$554 million in replacement buses thru 2018, and \$160 million per year in transit operations. While we support these goals, we don't want to be locked into the dollar amounts if federal and/or state funding is cut and no alternative funding source is available. This applies to the regional funding programs such as Air Quality (\$180 million), Bicycle and Pedestrian (\$350 million), Transportation Demand Management (\$44 million) and Community Design (\$500 million) as well.
- 2-8 [ 8. The MOU between SACOG and PCTPA provides that PCTPA and cities within PCTPA's jurisdiction are able to choose their own projects for which to use federal transportation funding, separate from the SACOG process. The EIR and mitigation measures therein, including measures ENE-15 & LU-2 regarding Complete Streets and LU-6 regarding Blueprint Implementation, need to reflect this fact.
- 2-9 [ 9. The Transportation Pricing Policy should address congestion pricing and funding sources for free or reduced transit fares during "spare the air" days, especially if they last for most or all of the summer.
- 2-10 [ 10. Considering the limited availability of funding, the measures should clearly emphasize funding being directed more toward projects than programs in order to maximize the efficient use of those funds.
- 2-11 [ 11. The City of Roseville request that SACOG ensure that the EIR mitigation measures requiring adoption of these policies be consistent with the recently modified SIP control measures, which requires research and development of the policies, rather than outright adoption of the policies (except in the case of "complete streets").

Thank you for the opportunity to comment on the DEIR. If you have questions on the comments provided, please feel free to contact me at 916-774-5507.

Sincerely,



Derek Ogden  
Associate Environmental Specialist