

California Native Plant Society

December 20, 2007

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

RE: Draft Environmental Impact Report
Metropolitan Transportation Plan for 2035

Dear SACOG,

The California Native Plant Society (CNPS) is a statewide non-profit organization of some 10,000 scientists, educators, and laypeople dedicated to the conservation and understanding of the California native flora. As a science-based conservation organization, we believe that good land use decisions must be accompanied by a thorough assessment of the environmental impacts as required by the state and federal Endangered Species Acts, the Clean Water Act, the National Environmental Policy Act, the California Environmental Quality Act, and other resource protection laws.

16-1

The Sacramento Valley Chapter of CNPS has been highly involved in participating in and commenting upon land use decisions at all levels that affect natural ecosystems in the Sacramento Valley. Chapter volunteers serve on the steering committees of several NCCP/HCP planning efforts. Chapter volunteers serve on local land trust boards, steering committees, and management committees. Chapter volunteers have testified at innumerable planning commission, board of supervisors, and city council meetings on projects that impact natural resources.

CNPS thanks SACOG for the opportunity to comment upon the Draft Environmental Impact Report (DEIR) for the Metropolitan Transportation Plan for 2035.

One of our primary concerns with the DEIR is the general lack of specific, implementable and measureable mitigation measures. For example:

16-2

- Mitigation Measure BIO-1 requires surveys for rare plants and Mitigation Measure BIO-2 requires that the projects avoid or minimize impacts to rare plants. But there is nothing measureable in BIO-2 which simply calls for redesign (if feasible), fence off populations, and then coordinate with the resources agencies to transplant (if feasible). There are also no compensatory mitigation measures specified for cases in which avoidance and transplantation are both unfeasible.
- Mitigation Measure BIO-3 requires a noxious weed survey and BIO-4 requires projects to avoid the dispersal of noxious weeds into uninfested areas. While Mitigation Measure BIO-4 calls for BMPs and cleaning of equipment after leaving infestation areas, there are no



Dedicated to the preservation of California native flora

measurable provisions for eradication of weeds that do get introduced as a result of the project.

16-2
cont.

While I provide only two examples, similar deficiencies—lack of specific, implementable and measurable actions—occur throughout the Mitigation Measures for Biological Resources in the DEIR. Without this information, it is impossible for the public to determine whether or not any of the Mitigation Measures will be adequate to address environmental impacts to biological resources.

16-3

Another primary concern is that many of the transportation corridors planned are entirely unnecessary and will open vast areas of agricultural and biological resources to development which would not otherwise occur. Simply stating that there will not be interchanges will not make it so. Once the road goes in, there will be tremendous pressure to construct interchanges and open up adjacent lands to development. For this reason, the Growth Related Impacts section and therefore the Cumulative Impacts section fail to adequately disclose the environmental impacts of the MTP2035.

16-4

We believe that this DEIR is wholly inadequate in addressing the environmental impacts of the MTP2035. You know there will be projects—some short-term and others long-term—but the DEIR does not analyze the impacts on the foreseeable horizon and therefore defers both analyses and mitigation to a later date.

CNPS recommends that a new DEIR be prepared that addresses the deficiencies in the Mitigation Measures and adequately analyzes the environmental impacts of the projects that will occur as a result of adoption of the MTP2035. In preparing the new Mitigation Measures, SACOG should carefully consider the provisions of the various NCCPs & HCPs being prepared in the region, the *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon*, and Critical Habitat Designations for various federally listed species. That new DEIR must then be recirculated for public comments.

Sincerely,



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