Appendix PD – 1
Notice of Preparations and Comment Letters
Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044  (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) EIR
Lead Agency: Sacramento Area Council of Governments (SACOG)  Contact Person: Renee DeVere-Oki
Mailing Address: 1415 L Street, Suite 300
Phone: (916) 340-6219
City: Sacramento Zip: 95814 County: Sacramento

Project Location: City/Nearest Community: Sacramento
Cross Streets: Counties - Yolo, Sutter, Yuba, El Dorado (portion), Placer (portion), Sacramento
Longitude/Latitude (degrees, minutes and seconds): _______° _______' _______" N / _______° _______' _______" W
Total Acres:
Assessor's Parcel No.: Section: Twp.: Range: Base:
Within 2 Miles: State Hwy #: Waterways:
Airports:

Document Type:
CEQA: X NOP □ Draft EIR □ Supplement/Subsequent EIR □ Mit Neg Dec
□ Early Cons □ NOI Other: □ NEPA: □ Other: □ Joint Document
□ Mit Neg Dec Other: □ Final Document
□ Rezone □ Prezone □ EA Draft EIS □ FONSI
□ General Plan Update □ Specific Plan □ Land Use/Compl □ Coastal Permit
□ General Plan Amendment □ Master Plan □ Redevelopment □ Other: MTP/SCS
□ General Plan Element □ Planned Unit Development □ Environmental
□ Community Plan □ Site Plan □ EIR □ Other: MTP/SCS

Local Action Type:

Development Type:
Residential: Units Acres □ Transportation: Type
□ Office: Sq.ft. Acres Employees □ Mining: Mineral
□ Commercial: Sq.ft. Acres Employees □ Power: Type
□ Industrial: Sq.ft. Acres Employees □ Waste Treatment: Type
□ Recreational: □ Hazardous Waste-Type
□ Water Facilities: Type MGD □ Other: Regional transportation and land use strategy

Project Issues Discussed in Document:
□ Aesthetic/Visual □ Flood Plain/Flooding □ Recreational/Parks □ Vegetation
□ Agricultural Land □ Forest Land/Fire Hazard □ Schools/Universities □ Water Quality
□ Air Quality □ Geologic/Seismic □ Septic Systems □ Water Supply/groundwater
□ Archeological/Historical □ Minerals □ Sewer Capacity □ Wetland/Riparian
□ Biological Resources □ Noise □ Soil Erosion/Compaction/Grading □ Growth Inducement
□ Coastal Zone □ Population/Housing Balance □ Solid Waste □ Land Use
□ Drainage/Absorption □ Public Services/Facilities □ Toxic/Hazardous □ Cumulative Effects
□ Economic/Jobs □ Other: _

Present Land Use/Zoning/General Plan Designation:
Various

Project Description: (please use a separate page if necessary)
The MTP/SCS is an integrated land use and transportation strategy for the SACOG region. The MTP is a long-range transportation plan that must be updated every 4 years to receive federal/state transportation dollars. An SCS is a required element of the MTP pursuant to SB 375. Among other requirements the SCS must identify areas within the region sufficient to house all the population, and identify policies and strategies to reduce per-capita passenger vehicle-generated GHG to CARB target levels. If the SCS does not achieve the GHG targets, as Alternative Planning Strategy (APS) must be prepared to show how the GHG targets can be achieved.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2019
Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X". If you have already sent your document to the agency please denote that with an "S".

X Air Resources Board
X Boating & Waterways, Department of
X California Emergency Management Agency
X California Highway Patrol
X Caltrans District #
X Caltrans Division of Aeronautics
X Caltrans Planning
X Central Valley Flood Protection Board
X Coachella Valley Mns. Conservancy
X Coastal Commission
X Colorado River Board
X Conservation, Department of
X Corrections, Department of
X Delta Protection Commission
X Education, Department of
X Energy Commission
X Fish & Game Region #
X Food & Agriculture, Department of
X Forestry and Fire Protection, Department of
X General Services, Department of
X Health Services, Department of
X Housing & Community Development
X Native American Heritage Commission
X Office of Historic Preservation
X Office of Public School Construction
X Parks & Recreation, Department of
X Pesticide Regulation, Department of
X Public Utilities Commission
X Regional WQCB #
X Resources Agency
X Resources Recycling and Recovery, Department of
X S.F. Bay Conservation & Development Comm.
X San Gabriel & Lower L.A. Rivers & Mns. Conservancy
X San Joaquin River Conservancy
X Santa Monica Mns. Conservancy
X State Lands Commission
X SWRCB: Clean Water Grants
X SWRCB: Water Quality
X SWRCB: Water Rights
X Tahoe Regional Planning Agency
X Toxic Substances Control, Department of
X Water Resources, Department of

Other:

Other:

Local Public Review Period (to be filled in by lead agency)

Starting Date: April 25, 2019
Ending Date: May 25, 2019

Lead Agency (Complete if applicable):

Consulting Firm: Ascent Environmental
Address: 455 Capitol Mall Suite 300
City/State/Zip: Sacramento CA 95814
Contact: Andrew Martin
Phone: (916) 417-4218

Applicant: SACOG
Address: 1415 L Street Suite 300
City/State/Zip: Sacramento CA 95814
Phone: (916) 340-6219

Signature of Lead Agency Representative: [Signature]
Date: 4/24/2019

SUMMARY NOTES-

Meeting: MTP/SCS EIR Scoping Meeting

Date: May 9, 2019

Purpose: A public scoping meeting to receive oral comments on the appropriate scope and content of the EIR was held on May 9, 2019 from 1:30 pm to 2:30 pm at the SACOG offices at 1415 L Street, Suite 300, Sacramento, CA 95814.

Attended by:

Renee DeVere-Oki, SACOG EIR Project Manager (Presenter)
Clint Holtzen, SACOG MTP/SCS Project Manager (Presenter)

General Public:
Mike Garabedian, Placer Group Sierra Club

Summary of presentation:

This meeting will not be recorded and SACOG staff will take summary notes of oral comments provided. Individuals are encouraged to send specific comments to the addresses provided on the printed NOP.

The MTP/SCS is an integrated land use and transportation strategy for the six-county region consisting of Sacramento, Sutter, Yolo, Yuba, and portions of Placer and El Dorado Counties (the Lake Tahoe basin in these counties is excluded from the SACOG region).

An MTP, referred to in other regions as a regional transportation plan (RTP) or long-range transportation plan (LRTP), is the mechanism used in California to conduct long-range (at least 20-year) planning in the applicable regional area. The SACOG MTP/SCS has a 2040 planning horizon. SACOG must adopt an MTP and update it every four years, or more frequently, if the region is to receive federal or state transportation dollars for public transit, streets/roads, and bicycle and pedestrian improvements. This is the region’s second update of the MTP/SCS.

An SCS is a required element of the MTP under California’s Sustainable Communities and Climate Protection Act, also known as Senate Bill 375 (SB 375) (Statutes of 2008, Chapter 728). The SCS identifies policies and strategies to reduce per-capita passenger vehicle-generated greenhouse gas (GHG) emissions to target levels set by the California Air Resources Board (CARB). The SCS must address: the general location of land uses, residential densities, and building intensities within the region; areas within the region sufficient to house all the population of the region; areas within the region sufficient to house an 8-year projection of the regional housing need; a transportation network to serve the regional transportation needs; information regarding resource areas and farmland in the region; consideration of state housing goals; a forecasted development pattern for the region; and compliance with the federal Clean Air Act. If the SCS does not achieve the GHG emission targets set by CARB, an additional analysis called an Alternative Planning Strategy (APS) must be prepared to accompany the SCS, demonstrating how the targets could be achieved.
In accordance with the California Environmental Quality Act (CEQA) Guidelines (Section 15082), the purpose of this Notice of Preparation (NOP) scoping meeting is to seek comments about the scope and content of the EIR that will be prepared analyzing this update of the MTP/SCS.

SACOG is particularly interested in learning what information may be helpful for such tiering in connection with your project-specific environmental review (if applicable). In particular, SACOG seeks your views on the following questions:

- Are there potential environmental issues that SACOG has not identified in the list of potential environmental effects listed below under the proposed EIR scope. If so, please identify these potential issues.
- Are there any alternatives you believe SACOG should evaluate?
- What types of mitigation measures do you think would help avoid or minimize potential environmental effects?

Adoption and implementation of the MTP/SCS has the potential to result in environmental effects in all of the environmental impact areas identified in CEQA. For this reason, the EIR will be a “full scope” document that analyzes all of the required CEQA environmental issue areas. These include: aesthetics; agriculture and forestry resources; air quality (including toxic air contaminants); biological resources; cultural resources; energy and global climate change; geology (including paleontological and mineral resources), soils, and seismicity; hazards and hazardous materials; hydrology and water quality; land use and planning; noise and vibration; population and housing; public services and recreation; transportation and traffic; utilities and service systems. The EIR will also address alternatives, growth inducing impacts, cumulative effects, and other issues required by CEQA.

Due to time limits mandated by State law, your response must be received no later than May 25, 2019, using any of the following methods:

<table>
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<tr>
<th>By Mail</th>
<th>By Fax</th>
<th>By E-Mail</th>
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<tr>
<td>SACOG</td>
<td></td>
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</tr>
<tr>
<td>1415 L Street, Suite 300</td>
<td>(916) 321-9551</td>
<td><a href="mailto:eircomments@sacog.org">eircomments@sacog.org</a></td>
</tr>
<tr>
<td>Sacramento, CA 95814</td>
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</table>

Summary of Public Comment:

Oral testimony was provided by Michael Garabedian of the Sierra Club for Placer County:

Mr. Garabedian spoke about the I-80 Interchange at SR65 listing segments in the MTP/SCS draft project list. He noted that what is being prosed would make it difficult to reach 19%. He said what was missing is fixed transit in this location; there is no alternative to widening in any meaningful kind of way. He recommended an analysis of fixed transit to Lincoln. He recommended the review of a 1995 Butte County study on rail particularly phase 1 and phase 2. He recommended the extension of RT. Also, to look at the state rail plan going north. He spoke regarding need for a Lincoln transit system and having transit between Lincoln and Roseville. He noted concern regarding how SB1 corridor projects could be
pulled from this list in the future; specifically, Placer Parkway and other various names of this project. He noted recent developments have made 65 more congested and this should be looked at environmentally. He recommended an analysis be done looking at local roads in Rocklin. He noted that 23% of the SACOG board is being represented by Placer. He spoke to induced growth and how median should be reserved for transit. Also, the need for increased density as an alternative. He recommended looking at the Citizen Alternative Growth plan. The Plan should look at developments coming back to life and the Placer County Preservation Plan.

Prepared by RDO, SACOG, 5/9/19
April 25, 2019

To: Reviewing Agencies

Re: 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) EIR
SCH# 2019049139

Attached for your review and comment is the Notice of Preparation (NOP) for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) EIR draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Renee De Vere-Oki
Sacramento Area Council of Governments
1415 I. Street, Suite 300
Sacramento, CA 95814

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: https://ceqanet.opr.ca.gov/2019049139/2.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Lead Agency
Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044  (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) EIR
Lead Agency: Sacramento Area Council of Governments (SACOG)  Contact Person: Renee DeVere-Oki
Mailing Address: 1415 L Street, Suite 300  Phone: (916) 340-6219
City: Sacramento  County: Multiple
Zip: 95814

Project Location: County: Multiple (listed below)  City/Nearest Community: Sacramento
Cross Streets: Counties - Yolo, Sutter, Yuba, El Dorado (portion), Placer (portion), Sacramento
Longitude/Latitude (degrees, minutes and seconds): ° / ° ° ° "N / ° ° ° W  Total Acres:
Assessor’s Parcel No.:
Section:
Twp.:
Range:
Base:

Within 2 Miles: State Hwy #:
Waterways:
Airports:
Railways:
Schools:

Document Type:
CEQA: [X] NOP  [ ] Early Cons  [ ] Draft EIR  [ ] Supplement/Subsequent EIR
[ ] Neg Dec  [ ] (Prior SCH No.)  [ ] NEPA: [ ] NOI  [ ] Other: [ ] Joint Document
[ ] Mit Neg Dec  [ ] Other: [ ] FONSI
[ ] Other:

Local Action Type:
[ ] General Plan Update  [ ] Specific Plan  [ ] Rezone  [ ] Annexation
[ ] General Plan Amendment  [ ] Master Plan  [ ] Prezone  [ ] Redevelopment
[ ] General Plan Element  [ ] Planned Unit Development  [ ] Use Permit  [ ] Coastal Permit
[ ] Community Plan  [ ] Site Plan  [ ] Site Plan Adjustments  [ ] Other: MTP/SCS

Development Type:
[ ] Residential: Units Acres  [ ] Transportation: Type
[ ] Office: Sq.ft. Acres Employees  [ ] Mining: Mineral
[ ] Commercial: Sq.ft. Acres Employees  [ ] Power: Type
[ ] Industrial: Sq.ft. Acres Employees  [ ] MW
[ ] Educational:
[ ] Recreational:
[ ] Water Facilities: Type MGD  [ ] Waste Treatment: Type MGD

Project Issues Discussed in Document:
[ ] Aesthetic/Visual  [ ] Fiscal  [ ] Recreation/Parks  [ ] Vegetation
[ ] Agricultural Land  [ ] Flood Plain/Flooding  [ ] Schools/Universities  [ ] Water Quality
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[ ] Drainage/Absorption  [ ] Population/Housing Balance  [ ] Toxic/Hazardous  [ ] Cumulative Effects
[ ] Economic/Jobs  [ ] Public Services/Facilities  [ ] Traffic/Circulation  [ ] Other:

Present Land Use/Zoning/General Plan Designation:
Various

Project Description: (please use a separate page if necessary)
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<td>Fish &amp; Wildlife Region 4</td>
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May 29, 2019

Renée DeVere-Oki
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

Re: 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy Environmental Impact Report Notice of Preparation (SCH# 2019049139)

Dear Ms. DeVere-Oki:

Thank you for providing the Delta Protection Commission (Commission) the opportunity to review the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The MTP/SCS is a long-range, integrated land use and transportation strategy for the Sacramento Area Council of Governments (SACOG) region.

The Commission is a State agency charged with ensuring orderly, balanced conservation and development of Delta land resources and improved flood protection. Proposed local government projects within the Primary Zone of the Legal Delta must be consistent with the Commission’s Land Use and Resource Management Plan (LURMP). Portions of Sacramento and Yolo counties are in the Primary Zone. For those portions of Sacramento and Yolo counties that are in the Secondary Zone and outside of the Legal Delta, we submit comments under Public Resource Code Sections 29770(d) and 5852-5855 (The Great California Delta Trail Act). These sections state that the Commission may comment on projects in the Secondary Zone that impact the Primary Zone and direct the Commission to develop and adopt a plan and implementation program for a continuous regional recreational corridor extending throughout the five Delta counties linking to the San Francisco Bay Trail and Sacramento River Trail.

We encourage the Project EIR to consider the LURMP and its policies when assessing the MTP/SCS’s consistency with applicable land use plans, policies, and regulations and to discuss the Delta Trail in the recreation and transportation setting sections. The Commission is currently preparing the Great California Delta Trail Blueprint Report for Sacramento, San Joaquin, and Yolo counties and will soon begin work on the Delta Trail Master Plan.
May 29, 2019
Page 2

Thank you for the opportunity to provide input. Please contact Blake Roberts, Senior Environmental Planner, at (916) 375-4237 for any questions regarding the comments provided.

Sincerely,

Erik Vink
Executive Director

cc: Oscar Villegas, Yolo County Board of Supervisors and Commission Chair
    Don Nottoli, Sacramento County Board of Supervisors and Commission Vice Chair
    Christopher Cabaldon, City of West Sacramento Mayor and Commission Member
June 21, 2019

Renee De Vere-Oki
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

Via email: eircomments@sacog.org

RE: Comments on Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the 2020 MTP/SCS, SCH #2019049139

Dear Ms. De Vere-Oki:

Thank you for the opportunity to review and comment on the Sacramento Area Council of Governments’ (SACOG) Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the 2020 Metropolitan Transportation Plan and Sustainable Communities Strategy (2020 MTP/SCS). The Delta Stewardship Council (Council) recognizes SACOG’s objective to prepare a regional transportation plan that links land use, air quality, and transportation needs to meet federal and state air quality standards. This letter provides the requirements of the Sacramento-San Joaquin Delta Reform Act of 2009 (Delta Reform Act), the Council’s enabling statute, pertaining to the 2020 MTP/SCS, as well as the Council’s comments on the NOP regarding the scope and content of the EIR for the MTP/SCS.

The Council is an independent state agency established by the Delta Reform Act, which is codified in Division 35 of the California Water Code, Sections 85000-85350. The Reform Act charges the Council with furthering California’s coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Sacramento-San Joaquin River Delta (Delta) ecosystem, to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (Cal. Water Code § 85054.) Pursuant to the Delta Reform Act, the Council has adopted the Delta Plan, a legally enforceable management framework for the Delta and Suisun Marsh for achieving the coequal goals. (Cal. Water Code § 85001(c.).)

"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place.”

– CA Water Code §85054
A. Delta Reform Act Requirements concerning Local and Regional Planning Agencies

1. Early Consultation

The Delta Reform Act grants the Council specific authority to review and advise local and regional planning agencies regarding the consistency of local and regional planning documents, including sustainable communities’ strategies and alternative planning strategies, with the Delta Plan. The Delta Plan requires a metropolitan planning organization preparing a regional transportation plan that includes land within the Delta primary or secondary zones to consult with the Council early in the planning process regarding the issues and policy choices relating to the Council’s advice. (Cal. Water Code § 85212 (Section 85212)).

Thank you for meeting with Council staff on January 15 and April 2, 2019 to describe the growth forecast and preferred scenario framework that will form the basis of the 2020 MTP/SCS. This early engagement will enable the Council to offer timely advice on the consistency of the 2020 MTP/SCS with the Delta Plan. The Council looks forward to continued consultations with SACOG as the preparation of the draft EIR and 2020 MTP/SCS process continues.

2. Council’s Review of the Draft Sustainable Communities Strategy

SACOG’s 2020 MTP/SCS is a regional transportation plan and sustainable community strategy that includes land within the Delta. In addition to early consultation (described above), Section 85212 requires SACOG to provide to the Council:

- a draft sustainable communities strategy and an alternative planning strategy, if any, no later than 60 days prior to the adoption of the final 2020 MTP/SCS; and

- concurrent notice of its submission of the strategy(ies) via electronic mail to coveredactions@deltacouncil.ca.gov.

If the Council concludes that the submitted draft sustainable communities strategy (or alternative planning strategy) is inconsistent with the Delta Plan, it will provide to SACOG a written notice of the claimed inconsistency no later than 30 days prior to the adoption of the final MTP/SCS. If SACOG receives a timely written notice of inconsistency from the Council, SACOG’s adoption of the final MTP/SCS must include a detailed response to the Council’s notice. (Cal. Water Code § 85212).

Please notify the Council via electronic mail when the adoption hearing for the final MTP/SCS is scheduled to Harriet Ross (harriet.ross@deltacouncil.ca.gov).
B. Comment on Scope and Content of EIR for 2020 MTP/SCS

1. Urban Expansion within the Delta

The Council exercises its authority through regulatory policies (set forth in Title 23 of the California Code of Regulations, Sections 5001 through 5016) and recommendations incorporated into the Delta Plan. One of these policies, Delta Plan Policy DP P1 (23 Cal. Code Regs. § 5010) places certain limits on new urban development within the Delta. New residential, commercial, or industrial development must be limited to areas that city or county general plans designate for such development as of the date of the Delta Plan’s adoption. This policy is intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk.

State and local agencies are required to demonstrate consistency with this policy, as well as the other regulatory policies contained in the Delta Plan, when carrying out, approving, or funding a covered action. However, the Delta Reform Act exempts actions within the Secondary Zone of the Delta that a metropolitan planning organization determines are consistent with its sustainable community strategy (or alternative planning strategy) and that the State Air Resources Board has determined would achieve regional greenhouse gas emission reduction targets. Such proposed actions are not covered actions regulated by the Council (Cal Water Code § 85057.5(b)(4)). This statute provides SACOG with a significant role in shaping the State’s Delta policy in urban areas.

Consequently, the EIR should analyze the 2020 MTP/SCS’s impacts on new residential, commercial, and industrial development in the Delta, and particularly, whether it induces new residential, commercial, or industrial development in the Delta Secondary Zone that was not accounted for at the time of the Delta Plan’s adoption (May 16, 2013).

The Council also has an interest in recommended transportation projects in the 2020 MTP/SCS that may have an impact on urban expansion, connections with rural areas, or that may otherwise impact the Delta. The EIR should describe what infrastructure beside the recommended transportation projects are necessary to support the strategy or the plans, programs, projects, or activities encompassed within it.

2. Consistency with Ecosystem Restoration Needs

The Delta Plan designates six priority habitat restoration areas that have the greatest potential for large-scale habitat restoration (Delta Plan, Chapter 4, p.136-138). Delta Plan Policy ER P3 (23 Cal. Code Regs. § 5007) states that significant adverse impacts to the opportunity to restore habitat must be avoided or mitigated in these areas (depicted in Appendix 5: http://deltacouncil.ca.gov/sites/default/files/2015/09/Appendix%205.pdf). The EIR should analyze whether the proposed project induces growth in any of the areas that the Delta Plan has designated to meet the Delta’s ecosystem restoration needs.
Closing Comments

As SACOG proceeds with development and environmental impact analysis for the 2020 MTP/SCS, we invite you to continue to engage Council staff in early consultation to ensure consistency between the 2020 MTP/SCS and the Delta Plan, to ensure that the two plans are complementary in nature and serve to protect the Delta while promoting sustainable growth and economic vitality in the broader region. Please contact Harriet Ross at (916) 445-5825 or Harriet.Ross@deltacouncil.ca.gov with any questions.

Sincerely,

Jeff Henderson, AICP
Deputy Executive Officer
Delta Stewardship Council

CC: Clint Holtzen, Jennifer Hargrove, Lynnea Ormiston
Central Valley Regional Water Quality Control Board

17 May 2019

Renee Devere-Oki  
Sacramento Area Council of Governments  
1415 L Street, Suite 300  
Sacramento, CA 95814

CERTIFIED MAIL  
7017 2620 0001 1359 2226

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, 2020 METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY (MTP/SCS) PROJECT, SCH#2019049139, YOLO, SUTTER, YUBA, EL DORADO, PLACER, AND SACRAMENTO COUNTIES

Pursuant to the State Clearinghouse’s 25 April 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Notice of Preparation for the Draft Environmental Impact Report for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) Project, located in Yolo, Sutter, Yuba, El Dorado, Placer, and Sacramento Counties.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

**Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State’s water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.
The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

**Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.
II. Permitting Requirements

Construction Storm Water General Permit
Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

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1 Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.
Industrial Storm Water General Permit
Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State
If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by
Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.


For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

**Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.

There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board’s website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/for_growers/coalition_groups/ or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.

2. Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100. Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 11-100 acres are currently $1,277 + $8.53/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

**Limited Threat General NPDES Permit**
If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order.

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

**NPDES Permit**
If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/
If you have questions regarding these comments, please contact me at (916) 464-4812 or Jordan.Hensley@waterboards.ca.gov.

Jordan Hensley
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento
May 25, 2019

Honorable Members of the SACOG Board of Directors
Executive Director James Corless
1415 L Street, Suite 300
Sacramento, CA 95814

Via e-mail to eircomments@sacog.org

Re: Comments on scope and content of the environmental impact assessment for the Draft Environmental Impact Report (DEIR) for the 2020 Metropolitan Transportation Plan/ Sustainable Communities Strategy (MTP/SCS) for the Sacramento Region

Dear SACOG board members and Mr. Corless:

These comments are submitted on behalf of the Environmental Council of Sacramento (ECOS) and Habitat 2020, which are coalitions of organizations working for social equity, public health and environmental sustainability in the Sacramento region, through land use planning, transportation planning, and habitat and agricultural preservation. Member organizations include: 350 Sacramento, Breathe California Sacramento Region, Citizens Climate Lobby Sacramento Chapter, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Sacramento Housing Alliance, Sacramento Natural Foods Co-op, Sacramento Vegetarian Society, Service Employees International Union Local 1000 Environmental Committee, Sacramento Environmental Democrats, Resources for Independent Living, Sacramento Electric Vehicle Association, California Native Plant Society Sacramento Valley Chapter, Sacramento Vegetarian Society, Friends of Stone Lakes National Wildlife Refuge, Friends of Swainson’s Hawk, Sacramento Area Creeks Council, Sacramento Audubon Society, Save Our Sandhill Cranes, Save the American River Association, and Sierra Club Sacramento Group.

SCS implementation can create a path to healthy, socially equitable, economically thriving, and environmentally sustainable communities. ECOS believes that implementation of the Draft 2020 MTP/SCS will provide more equitable choices for housing and transportation, better protection of biodiversity and agricultural resources, and a reduction of vehicle miles traveled (VMT) to help achieve the greenhouse gas (GHG) reduction target for the SACOG region. However, ECOS notes disparities between SACOG’s MTP/SCS and the adopted growth plans of the region's individual jurisdictions. Many of the jurisdictions in the region appear unwilling to implement the strategies proposed by SACOG. ECOS asks SACOG to find ways to motivate the 28 jurisdictions to commit to implementation of the MTP/SCS.
ECOS favors complete streets to provide the best bicycle and pedestrian access that can be funded, especially safe routes to schools. Therefore, ECOS urges SACOG to increase the funding proposed for active transportation projects. SACOG’s Travel Demand Forecast Modeling allows for more accurate forecasting based on activities and series of trips. This model allows for equity and environmental justice analysis as well as smart growth analysis. SACOG should continue to share this tool to help local jurisdictions evaluate their plans and development projects to determine the best smart growth scenarios to be utilized in the 2020 update.

Progress in development of a sophisticated phasing and cost-benefit analysis protocol for review of projects is a significant achievement that SACOG should continue to use in the 2020 Update. ECOS applauds SACOG board members and their respective jurisdictions that participated in negotiations to identify, delay, or cut poorly performing projects to bring the plan into conformity with the GHG reduction targets. ECOS appreciates that SACOG staff is providing the capability to make these negotiations possible; this should help with successful MTP/SCS implementation.

SACOG’s Rural Urban Connections Strategy (RUCS) provides valuable analysis of the complex dynamics of our agricultural economy and operations, and should help improve the region’s rural communities. Continued development and inclusion of SACOG’s climate adaptation analysis is a significant step toward anticipating the challenges posed to our infrastructure. This analysis should serve as a model for our jurisdictions in planning for community resilience to changing climatic conditions. SACOG should encourage local jurisdictions to make their Climate Action Plans congruent.

ECOS commends two achievements and progress in the 2020 MTP/SCS: (1) substantial projected increases in transit service, ridership and access; and (2) improved access to transit in disadvantaged communities. However, SACOG’s Draft Preferred Scenario Transportation Project List allocates more funds for increased roadway capacity as opposed to roadway rehabilitation. SACOG should continue the "fix-it-first" initiative to allocate more funding towards road maintenance as opposed to new road construction. Furthermore, SACOG should specify criteria used for mitigation, considering the induced demand resulting from increased roadway capacity. Also, SACOG should revise its Project List to provide additional funds for active transportation.

ECOS commends SACOG for development of a plan that attempts to meet State GHG reduction goals in the transportation/land-use sector. SACOG proposes a growth scenario that projects VMT reduction performance through land use and transportation behavior change. Considering the political and fiscal realities within which SACOG operates, and given the general plans of local jurisdictions, ECOS understands that the preferred scenario SACOG has put forth in the 2020 Update is a compromise between what should be done and what the jurisdictions are actually likely to do to meet regional goals and the SB 375 reduction target.

Given political realities within the region, ECOS fears the compromise that the MTP/SCS preferred scenario presents will not be achievable. Land use alternative scenarios 1 and 3 of the 2020 MTP/SCS provide a reasonable analysis of what could "feasibly" be altered from scenario 2, but they do not adequately represent the full range of possibilities for the region. The performance outcomes for Scenario 3 show the greatest long-term positive.
returns for the region, in terms of access to jobs, economic growth, enhanced equity, improved public safety, improved public health, preservation of agriculture and biodiversity, and air quality. However, if costly scenarios are deemed fiscally/politically infeasible, due to the projected high rate of transit fare box recovery, they may not be realistic. Political will is needed to make different choices about how we assemble and invest public resources to achieve regional goals.

ECOS asks for a VMT/GHG performance comparison between the preferred scenario and a "business-as-usual" scenario, that fully represents the currently adopted growth plans of the region's cumulative general plans. ECOS also asks how VMT/GHG performance could be achieved by a land use scenario in which twenty-year growth was constrained solely to existing "Established Communities" (no sprawl development) with the same fiscal constraints as in the current preferred scenario. These alternative analyses could provide reference points to guide decision making in the region. ECOS notes that the existing urbanized area of the Sacramento region has much lower density than is needed to achieve needed GHG reductions. Given the tremendous capacity for growth in existing urban areas, an all-infill scenario should be developed. ECOS is concerned that jurisdictional growth is not currently proceeding in a direction that will make it possible to meaningfully implement this strategy (note recent efforts to add Spheres of Influence).

While market analyses in Sacramento demonstrate the growing demand for infill and transit-oriented development (TOD) with more small lot and attached housing options, current and planned development in the Sacramento region is focused on peripheral, automobile-oriented, greenfield development. Too much planned development is outside of the SCS footprint, such as major potential expansion areas that are being pursued, including proposals such as Cordova Hills, the Natomas Vision, and continued applications to expand the Sphere of Influence of the City of Elk Grove. All three of these proposals are out of the SCS footprint for Developing Communities, and the latter two would require substantial expansions of Sacramento County's Urban Services Boundary (USB). The USB, adopted in 1993, was envisioned as the ultimate permanent growth boundary for the County. Further, these peripheral pressures continue while major infill proposals are not capitalizing on their potential. For example, the Sacramento Railyards (one of the largest contiguous infill opportunities in the nation) proposes to halve previously planned residential capacity. ECOS expects that regional population and housing numbers in twenty years will be closer to SACOG's projections than to the aggregate general plans of the individual jurisdictions. Projected reductions in VMT, and GHG emissions, cannot be achieved with current regional development trends, and with build-out of general plans in regional jurisdictions.

The region is only a few peripheral projects away from making the proposed plan impossible to implement. The transportation plan proposed by the 2020 MTP/SCS Update to meet emission reductions relies on significantly increased residential densities. By 2036, the SACOG strategy projects very ambitious and commendable increases in transit system expansion, access, and service. However, this system can only be built if jurisdictions commit to constrain their growth patterns to meet these densities. These major transit improvements proposed in the later years of the plan, without significant additional funding from new sources, will necessarily rely on the land use density increases proposed in the plan to obtain the ridership and fare box recovery needed to justify and sustain the system. Peripheral low-density greenfield growth threatens the regional plan in these ways: 1) It
directly increases VMT and GHG emissions; 2) regional government must then allocate funding to more roads to service those communities, further limiting funding that could be used for transit; and 3) peripheral growth inhibits the ability to achieve the density needed to provide the ridership and fare recovery to maintain the transit system.

Sacramento area transit has higher fares than elsewhere in the state. To avoid exclusion of low-income residents, increases in fare box recovery must focus on increased ridership. However, the region is not on track to achieve the densities required to make this kind of ridership a reality. Even if the required densities were achieved, such a dramatic increase in service cannot be maintained without new sources of funding, or further allocation of existing funds, for transit maintenance and operations. Significantly more funding will be required for transit operations earlier in the plan to realize these goals. It is imperative to allocate a greater proportion of funding to transit earlier in the plan for three reasons: 1) to combat peripheral growth pressures by capacitating and stimulating transit-oriented infill development to induce change in the housing market and travel behaviors; 2) for the transit system to have the capacity to handle higher density when it comes, before it comes, or at least concurrently (if housing and commercial growth occurs before the improved transit service, then that growth will be car-oriented, after which, travel behavior is less likely to change); and 3) to ensure that disadvantaged communities retain increased access to needed transit regardless of how growth eventually occurs.

ECOS recognizes that the implementation challenges of the 2020 Update are not entirely within SACOG’s control. Local, state and federal actions must be taken to find new sources of funding for public transit operations. Without new sources of transit funding, SACOG would need to substantially reallocate existing funding from road construction to realize the 2036 transportation system as envisioned in the plan. The current growth patterns of the region inhibit the ability of SACOG to make such a reallocation responsibly. Without higher densities, the amount of new transit funding sources needed to fill the void left by a lack of ridership is unlikely to materialize. For the region to realize the proposed 2036 transportation plan, with many resulting co-benefits, the region’s jurisdictions must alter their current growth plans and policies to be in alignment with the proposed SCS.

The SACOG board must work collaboratively with the jurisdictions, staff, and regional stakeholders to establish stronger policies and mechanisms to incentivize SCS compliance beyond the CEQA streamlining benefits afforded by SB 375. ECOS suggests an expansion of SACOG’s discretionary funding conditioned strictly to SCS compliance. Protocols should be established with the jurisdictions that require demonstration of performance in accordance with SCS goals for funding awards. The metrics to measure this performance include VMT, GHG, and air quality; but should also include costs and benefits to equity, and public and ecological health. SACOG has been a leader in developing innovative tools that inform the decision-making of its jurisdictions. This must continue, and SACOG’s analyses, tool development, and guidance should be improved.

SACOG has developed a plan that provides a strategy for the region that approaches the SB 375 GHG reductions targets imposed by the California Air Resources Board. Total VMT is projected to grow significantly with expected population growth in the region; ECOS is pleased to see projected VMT per capita declining in the plan. As VMT is the primary metric by which GHG reductions under SB 375 are measured, SACOG should better illustrate how per capita reduction in VMT translates to per capita GHG emission.
reduction. SACOG should also explain what other factors affect GHG calculations. Travel modeling should incorporate presumptions about electric vehicle use, as well as fuel and vehicle efficiency. SACOG should also explain its non-VMT related presumptions, and how these affect the plan’s GHG performance.

SACOG’s board and the region should act urgently to give SACOG staff the resources to develop this modeling capability. SACOG should use other tools in development, such as the UC Davis Center for Regional Change's Urban Footprint "Equity Module," to further develop and employ in ensuing MTP/SCS updates. These tools will be essential for the region to meet its regional GHG reductions targets, because lower income residents will use transit more if it is available. When lower income households can afford to live in communities served by transit, they drive fewer miles and use transit at a higher rate than higher income households. Currently, lower income groups are poorly served by transit and would use transit in much larger numbers if the fixed-route system were more than the lifeline service offered by the region’s transportation agencies. Successful SCS implementation requires an understanding of where low-income residents live (and where they are moving to) to ensure they have increased access to adequate transit service.

Focusing growth towards transit-oriented infill development conflicts with rising property values and preserving affordable housing. This conflict is particularly occurring in Sacramento’s urban core, where property values and rental pricing have been rising very rapidly. Necessarily there is a data delay in the MTP/SCS, but ECOS fears that gentrification and displacement is happening in the region's most transit-oriented areas at a rate faster than the data captures. When lower income households are displaced from areas served by transit, they are replaced by higher income households who drive far more miles and own more far more vehicles than lower income households that live within ¼ mile of transit (California Housing Partnership Corporation & TransForm, 2014). Higher income households are less likely to take advantage of available transit services when living in transit-rich neighborhoods.

Unless homes in transit-rich areas are made affordable, the compact housing development patterns and increased transit service detailed in the SCS cannot realize their full potential for VMT reduction, the primary driver of GHG reduction and fare box recovery. SACOG should provide regional analysis and leadership by better tracking trends in displacement and illustrating the repercussions of these trends. However, the greater responsibility lies with the jurisdictions to ensure that the residents and communities that have the most need for housing and transportation options are not excluded from the benefits in health and economy that the SCS could provide. Housing products that tend to be smaller and naturally lower cost are no substitute for affordable housing, particularly in our region’s tightening rental market. All jurisdictions must adopt strict mixed-income housing ordinances and anti-displacement measures that ensure the preservation of existing affordable work-force housing and better enforce expansion of affordable housing stock. Further, SACOG should adopt policies that make demonstration of meeting these housing goals a condition for transportation funding.

The progress of the RUCS project provides valuable analysis and tools, particularly for the regional agricultural sector. Progress is also being made in integrating ecosystem service considerations, such as flood control, groundwater recharge, and carbon sequestration, across the plan and environmental analysis. Yet, continued progress is needed. The
acreages of impact are important, but the location of these impacts is also crucial. Mapping the distribution of anticipated impacts in the proposed project would inform how the growth pattern would affect regional level connectivity and ecosystem viability, as well as localized species needs. Such spatial analysis would be an invaluable resource for the region’s agencies to integrate consideration of the need for both human and ecological health in planning decisions. SB 375 offers a holistic regulatory paradigm to incorporate broad interests of public health, equity and natural resource conservation into our planning for regional growth. However, although water is the greatest growth-constricting factor, it is not adequately part of this framework for SCS development.

Rapidly declining health of aquatic species populations in the Delta and our rivers, and the unprecedented water conservation measures enacted in the recent drought, indicate that the region is approaching the threshold of water supply capacity to meet municipal and ecological needs. SACOG has attempted to consider the potential impacts of the project to water supply and quality, and has offered worthwhile guidance for mitigation of these potential impacts, without authority to implement these mitigation strategies. While the region’s agencies are working to manage our surface and ground water supplies under difficult conditions, a more sophisticated regional coordination of water considerations is needed to responsibly guide our long-range growth pattern. The SCS offers an appropriate vehicle for this coordination, and the region’s agencies should continue to work collaboratively with each other and SACOG to provide this capability. Considering impacts to agriculture, biodiversity, ecosystem services, and water in general, SACOG should further develop strategies that would consume fewer acres of wild or agricultural lands, as compared to the acreage consumed in the previous 20 years. ECOS applauds SACOG’s progress in development of the 2020 MTP/SCS update, and we call on all of the region’s jurisdictions to make the serious changes to their growth patterns and policies that will be necessary to make this SCS a reality. ECOS appreciates the attention that SACOG has provided us in addressing our concerns and suggestions to date.

Respectfully submitted,

Ralph Propper, President
ECOS Board of Directors
May 17, 2019

Renee De Vere-Oki
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

RE: SCH# 2019049139 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) EIR, Yolo, Sutter, Yuba, El Dorado, Placer, & Sacramento Counties

Dear Ms. Vere-Oki:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064(a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, “tribal cultural resources” (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC’s recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.
AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
   d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe’s Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
   a. For purposes of AB 52, “consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project’s impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency’s environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).
7. **Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
   a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
   b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. **Recommend Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
    a. Avoidance and preservation of the resources in place, including, but not limited to:
       i. Planning and construction to avoid the resources and protect the cultural and natural context.
       ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
       i. Protecting the cultural character and integrity of the resource.
       ii. Protecting the traditional use of the resource.
       iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. **Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)
SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor’s Office of Planning and Research’s “Tribal Consultation Guidelines,” which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18’s provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a “Tribal Consultation List.” If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).

2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.

3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city’s or county’s jurisdiction. (Gov. Code §65352.3 (b)).

4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
   a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
   b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and “Sacred Lands File” searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

**NAHC Recommendations for Cultural Resources Assessments**

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. **Contact the appropriate regional California Historical Research Information System (CHRIS) Center** (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
   a. If part or all of the APE has been previously surveyed for cultural resources.
   b. If any known cultural resources have already been recorded on or adjacent to the APE.
   c. If the probability is low, moderate, or high that cultural resources are located in the APE.
   d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
   a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
   b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Katy.Sanchez@nahc.ca.gov.

Sincerely,

[Signature]

Katy Sanchez
Associate Environmental Planner

cc: State Clearinghouse
May 25, 2019

Renee Devere-Oki, Senior Analyst
Sacramento Area Council of Governments
1415 L Street, Suite 300, Sacramento, CA 95814

RE: Notice of Preparation for the Environmental Impact Report for the Sacramento Region 2020 Metropolitan Transportation Plan / Sustainable Communities Strategy Update

Dear Ms. Devere-Oki:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the Sacramento Area Council of Governments (SACOG) for the opportunity to evaluate the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the Sacramento region’s 2020 Metropolitan Transportation Plan / Sustainable Communities Strategy (MTP / SCS) Update. We have reviewed the project in a manner consistent with the California Health and Safety Code Section 40961 requirement that the District “represent all the citizens of the Sacramento District in influencing the decisions of other public and private agencies whose actions may have an adverse impact on air quality.” We offer the following comments.

**Induced Vehicle Miles Traveled**

The transportation analysis in the EIR should address all vehicle miles traveled (VMT) impacts, including impacts from induced VMT, which occurs when the addition of roadway capacity induces VMT by changing travel behavior such as trip length and mode use.\(^1\,^2\) In discussion draft project lists presented to date, almost 30% of expenditures were for road and highway capacity projects, and any associated induced VMT may affect the Sacramento region’s ability to meet California Air Resources Board (CARB) targets for VMT emissions reductions, to achieve climate and air quality goals and standards.

These impacts should be properly measured, disclosed and mitigated, consistent with the most current state guidance on assessing VMT in environmental review. The California Governor’s Office of Planning and Research (OPR) December 2018 Technical Advisory on Evaluating


Transportation Impacts in CEQA provides guidance on assessing VMT, including induced VMT, and mitigating impacts.

We recommend discussing, identifying and quantifying potential mitigation measures for induced VMT so that if individual projects are later determined to induce VMT, feasible options will be readily available during project-level analysis. Such measures would support CARB targets for VMT reductions, such as those called for by SB 375. Such measures could include funding active transportation projects such as in corridor system management plans, congestion pricing, additional transit, implementing corridor system management plans, and funding transportation demand management.

Managed Lanes
In assessing VMT reductions associated from managed lane projects, any managed lane project should include study of an alternative using a configuration of at least two lanes in the same direction. Previous studies in the region have assessed High-Occupancy Toll (HOT) lanes with only one lane. Efficiency is maximized where there are at least two lanes in the same direction.³

Construction
SACOG should recommend that all projects in the MTP / SCS comply with SMAQMD thresholds and mitigation, as applicable. While construction emissions on an individual project may have a limited duration, the construction sector represents an on-going cumulative source of emissions in the air basin. Implementing SMAQMD’s standard mitigation measures can achieve emission reductions that are an integral part of our compliance with the California Clean Air Act. Caltrans does not use SMAQMD thresholds and mitigations, although OPR recommends that lead agencies “harmonize thresholds with those of other agencies to the extent possible, particularly the technical thresholds of regulatory agencies such as an air quality management district …”⁴

Toxics
The EIR should assess and disclose potential health impacts from MTP projects and programs that could increase exposure to toxic motor vehicle and locomotive emissions. In particular, the EIR should assess the health effects of diesel particulate matter generated from high volume roadways, locomotive railways and the construction of transportation projects.

We recommend that SACOG encourage its member jurisdictions to use existing guidance to assess and reduce toxic impacts from MTP projects. This includes CARB’s 2017 Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways, and within Sacramento County, the Mobile Sources Air Toxics Protocol.

Finally, we recommend that the EIR, or related documents, address health impacts from MTP projects and programs region-wide, instead of simply on a project-by-project basis. One approach


would be a plan for regional greening near highways, to reduce exposure for nearby sensitive populations.

Ample guidance exists to create such a plan. In July 2016, the United States Environmental Protection Agency released **Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality**, summarizing the current research findings and best practices. SMAQMD in turn released **Landscaping Guidance for Improving Air Quality near Roadways**, which focuses on the Sacramento region and aims to translate information from the EPA Recommendations for use by the region’s land use planners and developers.

**Friant Ranch**
Analysis must include a discussion of the California Supreme Court’s holdings in **Sierra Club v. County of Fresno (2018)** regarding the Friant Ranch Specific Plan in Fresno County. The Court held, among other holdings, that an EIR must show reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.

**Conclusion**
Thank you for your attention to our comments. If you have questions about them, please contact SMAQMD staff member Molly Wright at mwright@airquality.org or 916-874-4207.

Sincerely,

Paul Philley, AICP
Program Supervisor, CEQA & Land Use Section
Sacramento Metropolitan Air Quality Management District
Sent Via E-Mail

May 28, 2019

Renee De Vere-Oki
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814
rdevere-oki@sacog.org

Subject: / NOP / 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy

Dear Ms. De Vere-Oki,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD’s vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

SMUD facilities and infrastructure are a common presence along major transportation corridors throughout the Notice of Preparation (NOP) area, including most major roads, interstates and other transportation mediums. Consequently, SMUD has numerous facilities that may border, cross or potentially conflict with any major planned transportation project. These facilities and infrastructure include (but are not limited to):

- Overhead poles of varying voltages (up to 230 kV).
- Underground lines of varying voltages (up to 230 kV).
- Underground gas pipelines.
- Pad-mounted equipment of varying voltages (up to 21 kV).
- Substations of varying voltages and size.

Impacts will depend on the scope and scale of any potential conflict.
It is our desire that the Project NOP will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- The potential need to relocate and or remove any SMUD infrastructure that may be affected in or around the project area

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NOP. If you have any questions regarding this letter, please contact SMUD’s Environmental Management Specialist, Rob Ferrera, at Rob.Ferrera@smud.org or 916.732.6676.

Sincerely,

Nicole Goi  
Regional & Local Government Affairs  
Sacramento Municipal Utility District  
6301 S Street, Mail Stop A313  
Sacramento, CA 95817  
nicole.goi@smud.org

Cc: Rob Ferrera
May 23, 2019

James Corless  
Chief Executive Officer  
Sacramento Area Council of Governments  
1415 L Street, Suite 300  
Sacramento, CA 95814

Dear Mr. Corless,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) Sacramento 2020 Metropolitan Transportation Plan/ Sustainable Communities Strategy (MTP/SCS). The UC Davis appreciates SACOG’s leadership role in advancing planning and transportation for the Sacramento region.

The MTP/SCS EIR should consider the anticipated growth as outlined in the University of California Davis campus’ Long Range Development Plans. The UC Davis main campus is located in Yolo and Solano Counties and includes more than 5,000 acres, most of which is dedicated to agricultural research. The 900-acre central campus, the area located between State Route 113, Interstate 80 and the City of Davis, is where the vast majority of teaching and research activities are located. The growth plan for the main Davis campus is the UC Davis 2018 Long Range Development Plan (LRDP). The 2018 LRDP is intended to support the teaching, research, and public service missions of the UC. The plan’s growth assumptions are based on campus population projections and an understanding of campus needs and goals.

The 2018 LRDP anticipates that the on-campus student population could grow from approximately 33,825 (2016–2017 academic year) to approximately 39,000 by the 2030–2031 academic year. In response to this potential increase in the student population and anticipated increases in mission-based activities, UC Davis anticipates that its faculty and staff population could increase from approximately 12,365 to approximately 14,500 in the same time frame. To accommodate the increased population and respond to evolving higher education needs at UC Davis, the 2018 LRDP proposes the development of construction of an additional 2 million square feet of academic and administrative building space. Substantial additional on-campus housing will also be developed to accommodate 100 percent of the new students as well as a portion of the existing campus population. More information about the 2018 LRDP and the 2018 LRDP EIR is available at the following website: https://campusplanning.ucdavis.edu/campus-planning/2018-ucdavis-lrdp.

The UC Davis Health System (Sacramento campus), approximately 142-acres, is located in the City of Sacramento, approximately 2.5 miles southeast of downtown Sacramento, and 17 miles east of the UC Davis main campus. The adopted growth plan for the Sacramento Campus is the UC Davis Sacramento Campus 2010 Long Range Development Plan (LRDP). The 2010 LRDP is a land use plan that will guide the physical development of the campus. The plan proposes general types of development and land uses to facilitate expanded and new program initiatives through 2025. The plan has been designed to accommodate an increase in building space at the Sacramento campus to 6.57 million gsf and growth in the on-site daily population (including patients, patient attendants, visitors, staff, faculty and other academic personnel, students, interns, residents and fellows) from 12,499 persons to 19,719 persons at full development under
the 2010 LRDP. As part of recent planning for the proposed UC Davis Aggie Square project, one potential change to the 2010 LRDP includes consideration for UC Davis to provide approximately 200 units of residential housing. More information about the 2010 LRDP is available at the following website: https://health.ucdavis.edu/facilities/contractors/LRDP.html.

The UC Davis transportation policies and actions promote healthier transportation system, expanded active transportation infrastructure and enhanced transit services. Unitrans, a local fixed route bus service to the UC Davis campus with support from the City of Davis, continues to celebrate its successes as a leader in regional public transit. Unitrans offers 19 routes serving campus and Davis neighborhoods, shopping centers, schools, and medical centers. Unitrans continues to be a shining star in this regard with higher ridership in FY2018 than in FY2017 and strong demand. Unitrans is largely a student-run system and is a national model of successful campus-based transit.

The University has made major progress on its ambitious Transportation Demand Management efforts by encouraging and rewarding people to carpool, bike, walk, bus or train to campus as an alternative to driving alone. Per the University of California Sustainable Practices Policy, the University continues to strive to reduce the percentage of employees and students commuting by Single Occupancy Vehicle (SOV) in 2025 by 10 percent relative to 2015-16 SOV commute rate. And, the policy states that UC Davis will strive to have no more than 40 percent of employees and no more than 30 percent of all employees and students commuting by SOV by 2050.

UC Davis looks forward to working with SACOG to find ways to collaborate on the MTP/SCS and other regional efforts. For any further questions or follow up, please contact me at 530-752-9795 or masalon@ucdavis.edu.

Sincerely,

Mabel Salon
Interim Lead, Government and Community Relations

cc: Matt Dulcich, UC Davis Director of Environmental Planning
Cliff Contreras, UC Davis Director of Transportation Services
Jeff Flynn, Unitrans General Manager
Mike Godfrey, UCDH Parking and Transportation Services
May 23, 2019

Renee DeVere-Oki, EIR Project Manager
SACOG
1415 L Street, Suite 300
Sacramento, CA 95814

Re: Notice of Preparation for the 2020 Metropolitan Transportation Plan/ Sustainable Communities Strategy (MTP/SCS) EIR

Dear Ms. DeVere:

Thank you for the opportunity to comment on the Notice of Preparation for the 2020 Metropolitan Transportation Plan/ Sustainable Communities Strategy (MTP/SCS) DEIR. Yolo LAFCo is likely not a Responsible Agency under CEQA for this project, however as the keeper of the urban-rural interface, the MTP/SCS has significant implications for LAFCo’s boundaries. Therefore, Yolo LAFCo offers these comments for SACOG consideration and to the extent they affect the DEIR project description, project alternatives and mitigation measures.

Any future growth areas identified in the MTP/SCS for Yolo County should be located within the existing city and community service district (CSD) boundaries and spheres of influence (SOI). The cities and CSDs are the local agencies best equipped to handle growth and able to provide municipal water services. For reference, our CSDs are located in the towns of Esparto, Knights Landing, Madison and Yolo.

As you are likely aware, the State Water Resources Control Board is severely curtailing any new public water systems and forcing connections to municipal systems across the state where critically needed and feasible. Yolo County Environmental Health is correspondingly trying to avoid new water systems in rural areas wherever possible.

Therefore, any new development should be directed to our cities as land availability allows and our four unincorporated communities noted above with municipal water systems.

Thank you again for consulting with Yolo LAFCo. If you have any questions, please feel free to contact me.

Best regards,

Christine M. Crawford, AICP
May 21, 2019

Renee Devere-Oki
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA  95614

Subject: Notice of Preparation of an Environmental Impact Report for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, Sacramento Region

Dear Renee Devere-Oki,

Thank you for providing additional information regarding the above mentioned project. Your letter requests feedback from agencies regarding the following items:

- Are there potential environmental issues that the Sacramento Area Council of Governments (SACOG) has not identified in the list of potential environmental effects listed below under the proposed Environmental Impact Report (EIR) scope. If so, please identify these potential issues.
  - **UAIC Comment** – Your proposed EIR scope referenced cultural resources, but did not reference Tribal Cultural Resources, which are a separate category of cultural resources. We recommend that the EIR analyze Tribal Cultural Resources.

- Are there any alternatives you believe SACOG should evaluate?
  - **UAIC Comment** – The proposed CEQA document has a large scope, and it is likely that future projects will tier off of the proposed EIR. For that reason, we do have a recommendation about best practices for developing alternatives:
    - When Tribal Cultural Resources are present within or near a project area, then one or more alternatives that avoid impacts to Tribal Cultural Resources should be evaluated in the CEQA document.

- What types of mitigation measures do you think would help avoid or minimize potential environmental effects?
  - **UAIC Comment** – In general, mitigation measures for Tribal Cultural Resources should be separate from mitigation measures for cultural resources because the significance associated with this category of resources (Native American cultural and religious significance) is different than the significance that is associated with Cultural Resources (for example, archaeological data potential). Often a cultural
site might be both an archaeological cultural resource and a Tribal Cultural Resource. For example, a grinding rock site is often considered to be both a cultural resource and a Tribal Cultural Resource. From our perspective, we are concerned with the cultural and religious significance and integrity of that Tribal Cultural Resource. Curation of artifacts from a Tribal Cultural Resource (which is a common mitigation measure for cultural sites) would adversely affect the significance and integrity of the site as a Tribal Cultural Resource, because tribal cultural and religious values assert that components of a cultural site should stay together at their original location. This example illustrates why Tribal Cultural Resources should be considered separately from archaeological cultural resources.

- **Post Review Discovery Mitigation Measures for Tribal Cultural Resources** – Because Tribal Cultural Resources are a unique cultural resource, consultation with Native American tribes to determine whether a post-review discovery is a Tribal Cultural Resource is a critical component of any post review discovery mitigation measures. UAIC’s preferred post-review discovery mitigation measure is attached for reference.

- **Worker Awareness Training** - UAIC’s preferred worker awareness training mitigation measure is attached for reference. While many consultants also prepare such educational materials, their education materials address archaeological identification and significance. It is important that Tribes have the ability to include information regarding tribal cultural and religious significance.

- **Avoidance** – Avoidance and preservation in place is the preferred manner of mitigating impacts to Tribal Cultural Resources. The attached mitigation measure includes best practices for how to avoid impacting Tribal Cultural Resources during the planning stage and during construction.

Thank you again for taking these matters into consideration, and for involving the UAIC in the planning process. Please contact Melodi McAdams, Cultural Resources Supervisor, at (530) 328-1109 or email at mmcadams@auburnrancheria.com if you have any questions.

Sincerely,

[Signature]

Gene Whitehouse,  
Chairman

CC: Matthew Moore, UAIC Tribal Historic Preservation Officer
From: Melodi McAdams <mmcadams@auburnrancheria.com>
Sent: Monday, May 20, 2019 2:23 PM
To: EIR Comments <eircomments@sacog.org>
Cc: Cherilyn Neider <cneider@auburnrancheria.com>; Steven Hutchason <shutchason@auburnrancheria.com>; Matthew Moore <mmoore@auburnrancheria.com>
Subject: Notice of Preparation of an Environmental Impact Report for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, Sacramento Region

Dear Project Manager Renee DeVere-Oki,

Thank you for your recent letter regarding the Notice of Preparation of an Environmental Impact Report for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, Sacramento Region. Your letter requests feedback from agencies regarding the following items:

- Are there potential environmental issues that SACOG has not identified in the list of potential environmental effects listed below under the proposed EIR scope. If so, please identify these potential issues.
  - **UAIC Comment** – Your proposed EIR scope referenced cultural resources, but did not reference Tribal Cultural Resources, which are a separate category of cultural resources. We recommend that the EIR analyze Tribal Cultural Resources.

- Are there any alternatives you believe SACOG should evaluate?
  - **UAIC Comment** – The proposed CEQA document has a large scope, and it is likely that future projects will tier off of the proposed EIR. For that reason, we do have a recommendation about best practices for developing alternatives:
    - When Tribal Cultural Resources are present within or near a project area, then one or more alternatives that avoid impacts to Tribal Cultural Resources should be evaluated in the CEQA document.

- What types of mitigation measures do you think would help avoid or minimize potential environmental effects?
  - **UAIC Comment** – in general, mitigation measures for Tribal Cultural Resources should be separate from mitigation measures for cultural resources because the significance associated with this category of resources (Native American cultural and religious significance) is different than the significance that is associated with Cultural Resources (for example, archaeological data potential). Often a cultural site might be both an archaeological cultural resource and a tribal cultural resource. For example, a grinding rock site is often considered to be both a cultural resource and a tribal cultural resource. From our perspective, we are concerned with the cultural and religious significance and integrity of that Tribal Cultural Resource. Curation of artifacts from a Tribal Cultural Resource (which is a common mitigation measure for cultural sites) would adversely affect the significance and integrity of the site as a Tribal...
Cultural Resource, because tribal cultural and religious values assert that components of a cultural site should stay together at their original location. This example illustrates why tribal cultural resources should be considered separately from archaeological cultural resources.

- **Post Review Discovery Mitigation Measures for Tribal Cultural Resources** – Because Tribal Cultural Resources are a separate type of resource, consultation with Native American tribes to determine whether a post-review discovery is a Tribal Cultural Resource is a critical component of any post review discovery mitigation measures. UAIC’s preferred post-review discovery mitigation measure is attached for reference.

- **Worker Awareness Training** - UAIC’s preferred worker awareness training mitigation measure is attached for reference. While many consultants also prepare such educational materials, their education materials address archaeological identification and significance. It is important that Tribes have the ability to include information regarding tribal cultural and religious significance.

- **Avoidance** – Avoidance and preservation in place is the preferred manner of mitigating impacts to Tribal Cultural Resources. The attached mitigation measure includes best practices for how to avoid impacting Tribal Cultural Resources during the planning stage and during construction.

Thank you for involving UAIC in the planning process at an early stage. We ask that you make this correspondence a part of the project record and we look forward to working with you to ensure that tribal cultural resources are protected.

Sincerely,
Melodi McAdams
Cultural Resources Supervisor
Tribal Historic Preservation Department
United Auburn Indian Community of the Auburn Rancheria
10720 Indian Hill Road
Auburn, CA 95603
(530) 328-1109 - office
(530) 401-7470 - cell

Nothing in this e-mail is intended to constitute an electronic signature for purposes of the Electronic Signatures in Global and National Commerce Act (E-Sign Act), 15, U.S.C. §§ 7001 to 7006 or the Uniform Electronic Transactions Act of any state or the federal government unless a specific statement to the contrary is included in this e-mail.
NOTICE OF PREPARATION (NOP)

To: Interested Agencies, Organizations, and Individuals

Project: Environmental Impact Report (EIR) for the 2020 Metropolitan Transportation Plan/ Sustainable Communities Strategy (MTP/SCS) for the Sacramento Region

Lead Agency: Sacramento Area Council of Governments (SACOG)

Comment Period: April 25, 2019 to May 25, 2019 (30 days)

OVERVIEW
You are invited by the Sacramento Area Council of Governments (SACOG) to comment on the scope and content of the environmental impact assessment that will be prepared for the update of the regional MTP/SCS. You may do so electronically, in person, or by mail – instructions are provided below.

The MTP/SCS is an integrated land use and transportation strategy for the six-county region consisting of Sacramento, Sutter, Yolo, Yuba, and portions of Placer and El Dorado Counties (the Lake Tahoe basin in these counties is excluded from the SACOG region). The attached map depicts the Sacramento metropolitan planning area which is the area covered by the MTP/SCS. More information about the MTP/SCS and the update process is available at the following web site: https://www.sacog.org/2020-metropolitan-transportation-plansustainable-communities-strategy-update

BACKGROUND
An MTP, referred to in other regions as a regional transportation plan (RTP) or long-range transportation plan (LRTP), is the mechanism used in California to conduct long-range (at least 20-year) planning in the applicable regional area. The SACOG MTP/SCS has a 2040 planning horizon. SACOG must adopt an MTP and update it every four years, or more frequently, if the region is to receive federal or state transportation dollars for public transit, streets/roads, and bicycle and pedestrian improvements. This is the region’s second update of the MTP/SCS.

An SCS is a required element of the MTP under California’s Sustainable Communities and Climate Protection Act, also known as Senate Bill 375 (SB 375) (Statutes of 2008, Chapter 728). The SCS identifies policies and strategies to reduce per-capita passenger vehicle-generated greenhouse gas (GHG) emissions to target levels set by the California Air Resources Board (CARB). The SCS must address: the general location of land uses, residential densities, and building intensities within the region; areas within the region sufficient to house all the population of the region; areas within the region sufficient to house an 8-year projection of the regional housing need; a transportation network to serve the regional transportation needs; information regarding resource areas and farmland in the region; consideration of state housing goals; a forecasted development pattern for the region; and compliance with the federal Clean Air Act. If the SCS does not achieve the GHG emission targets set by CARB, an additional analysis called an Alternative Planning Strategy (APS) must be prepared to accompany the SCS, demonstrating how the targets could be achieved.

MORE INFORMATION
In accordance with the California Environmental Quality Act (CEQA) Guidelines (Section 15082), the purpose of this Notice of Preparation (NOP) is to seek comments about the scope and content of the EIR that will be prepared analyzing this update of the MTP/SCS. If you represent an agency that may use the EIR for tiering purposes, SACOG is particularly interested in learning what information may be helpful for such tiering in connection with your project-specific environmental review.
In particular, SACOG seeks your views on the following questions:

- Are there potential environmental issues that SACOG has not identified in the list of potential environmental effects listed below under the proposed EIR scope. If so, please identify these potential issues.
- Are there any alternatives you believe SACOG should evaluate?
- What types of mitigation measures do you think would help avoid or minimize potential environmental effects?

**PROPOSED EIR SCOPE**

Adoption and implementation of the MTP/SCS has the potential to result in environmental effects in all of the environmental impact areas identified in CEQA. For this reason, the EIR will be a “full scope” document that analyzes all of the required CEQA environmental issue areas. These include: aesthetics; agriculture and forestry resources; air quality (including toxic air contaminants); biological resources; cultural resources; energy and global climate change; geology (including paleontological and mineral resources), soils, and seismicity; hazards and hazardous materials; hydrology and water quality; land use and planning; noise and vibration; population and housing; public services and recreation; transportation and traffic; utilities and service systems. The EIR will also address alternatives, growth inducing impacts, cumulative effects, and other issues required by CEQA.

Due to time limits mandated by State law, your response must be received no later than May 25, 2019, using any of the following methods:

<table>
<thead>
<tr>
<th>By Mail</th>
<th>By Fax</th>
<th>By E-Mail</th>
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</thead>
<tbody>
<tr>
<td>SACOG</td>
<td></td>
<td><a href="mailto:eircomments@sacog.org">eircomments@sacog.org</a></td>
</tr>
<tr>
<td>1415 L Street, Suite 300, Sacramento, CA 95814</td>
<td>(916) 321-9551</td>
<td></td>
</tr>
</tbody>
</table>

A public scoping meeting to receive oral comments on the appropriate scope and content of the EIR will be held on May 9, 2019 from 1:30 pm to 2:30 pm at the SACOG offices at 1415 L Street, Suite 300, Sacramento, CA 95814.

If you have any questions or need help finding or understanding available materials, please let us know. The name and contact information for the SACOG project manager is provided below.

**Date:** April 25, 2019  
**Signature:**  
**Project Manager:** Renee DeVere-Oki  
**Title:** EIR Project Manager  
**Telephone:** (916) 340-6219  
**Email:** rdevere-oki@sacog.org

Attachment – Map of SACOG Region
Inadvertent Discoveries Mitigation Measure

If potential tribal cultural resources (TCRs), archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered by Native American Representatives or Monitors from interested Native American Tribes, qualified cultural resources specialists or other Project personnel during construction activities, work will cease within 100 feet of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from a traditionally and culturally affiliated Native American Tribe is present. A qualified cultural resources specialist and Native American Representatives and Monitors from traditionally and culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, returning objects to a location within the project area where they will not be subject to future impacts. The Tribe does not consider curation of TCR’s to be appropriate or respectful and request that materials not be permanently curated, unless requested by the Tribe.

Treatment that preserves or restores the cultural character and integrity of a Tribal Cultural Resource may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. These recommendations will be documented in the project record. For any recommendations made by traditionally and culturally affiliated Native American Tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If adverse impacts to tribal cultural resources, unique archeology, or other cultural resources occurs, then consultation with UAIC and other traditionally and culturally affiliated Native American Tribes regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 should occur, in order to coordinate for compensation for the impact by replacing or providing substitute resources or environments.
Tribal Cultural Resource Avoidance Mitigation Measure

1. Avoidance and preservation in place is the preferred manner of mitigating impacts to tribal cultural resources and will be accomplished by several means, including:

   a. Planning construction to avoid archaeological sites; incorporating sites within parks, green-space, or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity. Recommendations for avoidance of cultural resources will be reviewed by the CEQA lead agency representative, interested Native American Tribes, and the appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology, and social, cultural, and environmental considerations and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources, or modification or realignment to avoid highly significant features within a cultural resource. Native American Representatives from interested Native American Tribes will be allowed to review and comment on these analyses and shall have the opportunity to meet with the CEQA lead agency representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.

   b. If the resource can be avoided, the construction contractor(s), with paid Native American Monitors from culturally affiliated Native American Tribes present, will install protective fencing outside the site boundary, including a buffer area, before construction restarts. The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an “Environmentally Sensitive Area.” Native American Representatives from interested Native American Tribes and the CEQA lead agency representative will also consult to develop measures for long term management of the resource and routine operation and maintenance within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional Cultural Properties, and cultural landscapes, in accordance with state and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties);
Tribal Cultural Resource Avoidance Mitigation Measure

National Park Service Preservation Brief 36 (Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes) and using the Advisory Council on Historic Preservation (ACHP) Native American Traditional Cultural Landscapes Action Plan for further guidance. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American Representatives from interested Native American Tribes.
In coordination with traditionally and culturally affiliated Native American Tribes, the project proponent will develop and administer a consultant and construction worker tribal cultural resources awareness brochure and training program for all personnel involved in project construction and implementation. The project proponent will distribute the brochure and ensure that the training is conducted in coordination with qualified cultural resources specialists and Native American Representatives and Monitors from traditionally and culturally affiliated Native American Tribes before any stages of project implementation and construction activities begin on the project site.

The program will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The worker cultural resources awareness program will also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and will outline what to do and whom to contact if any potential tribal cultural resources, resources or artifacts are encountered. The program will also underscore the requirement for confidentiality and culturally-appropriate treatment of any find of significance to Native Americans and appropriate behaviors to use onsite, consistent with Native American Tribal values.
This is the MTP/SCS EIR scoping comment submitted last night at midnight March 26 Memorial Day Weekend with some corrections and clarifications in black ink and deletions not shown.

Mike Garabedian
Placer Group Sierra Club

Begin forwarded message:

From: Michael Garabedian <michaelgarabedian@earthlink.net>
Subject: Placer Group Sierra Club SACOG 2020 MTP/SCS EIR Scoping Comments
Date: May 26, 2019 at 12:00:15 AM PDT
To: eircomments@sacog.org

These are needed concepts for inclusion in the MTP/SCS EIR.

1. A guided fixed rail-centric transit system alternative is needed for the Potential Future Growth Area of the pending proposed PCCP.

   a. PCCP development includes PCCP participant Lincoln. Roseville, Rocklin, and Loomis are not part of the PCCP but could annex into its area. Placer Parkway is a preferred SACOG project and is part of the proposed PCCP. Placer Parkway sponsor South Placer Regional Transportation Authority (SPRTA) and the Placer Regional Transportation Planning Agency (PCTPA) are PCCP participants. SPRTA has fewer of the same PCTPA board members. The PCCP map is used in this comment to define an area of analysis for purposes of the EIR. The Sierra Club is a long term participant in the PCCP stakeholder process.

      aa. All past and current transit and transit related studies and institutional arrangements affecting the area from Downtown Sacramento, from and to Oakland on the AMTRAK corridor, and in the six county SACOG region plus Butte County, need to be assembled and reviewed as part of developing this alternative.

   b. This fixed guideway alternative should be defined as the core of local transit systems.

   c. This would not include adding lanes for bus only, HOV or other vehicular use.

2. In addition to the fixed transit alternative above, an alternative that relies on handling vehicles and local transit on boulevards independently and together without the these three SACOG Preferred projects: (a) I-80/SR 65 interchange
improvements (with current related and proposed projects, the cost for this is more than the $500 million Major Project threshold and should be considered as such), (b) Placer Parkway, and (c) SR 65 lane widening.

a. Adding capacity will not relieve congestion as proponents are asserting.


b. The local boulevards now function quite well and demonstrate that our boulevards are well located, effective and make the use of widening SR 65 unnecessary for the vast number of existing residents.

c. SR 65 goes to Wheatland which gets about 20,000 vehicles per day maximum.

3. Develop surface connector roads instead of initiating the preferred highway improvements.


4. With Placer Parkway as the first leg of a Sacramento Belt Loop. Therefore, with Sacramento-Lincoln-Auburn downtown to rural Placer County transit a congested corridor, and with north-south rail passenger and transit needs, the future of Placer, Yuba, Sacramento, Sutter, and Butte Counties are joined for the foreseeable transportation future. Butte County is not in SACOG, but its COG wrote the 1995 preliminary study of rail passenger service to Butte County through Lincoln).

a. If Placer Parkway is built, Folsom and Elk Grove will want highway connections to it.

aa. Local connectors can substitute for this. East-west roads are now used for airport access.

b. Denver’s highly congested loop has not been completed since it was started perhaps 25 years or so ago, because Boulder County that became sustainably oriented is a slow and responsible growth community, and refuses to build its link. The Denver Belt Loop has fostered massive unsustainable growth and has solved nothing.

5. Assess the major economic expectations and assumptions.

a. The construction of large universities has become financially infeasible.

b. The Placer County Panning Commission in recent days changed the Regional University Specific Plan to allow the eastern Community Development area to proceed before and even without the university. This also indicates financial infeasibility.
6. All income housing needs, density concentration at transit hubs, economic and job opportunity, are among environmental, social and economic factors:

a. The old General and Specific Plans are being changed. The County reduced park and open pace in Placer Vineyards. Regional University is now being combined with Placer Vineyards for some purposes such as the county constructing some public facilities instead of the developers. SACOG must adjust to this.

b. All income housing needs to be assessed as social and economic impacting factors as well as an environmental impact related to and dependent on transit and economic opportunities including jobs.

c. The Placer County Planning Commission just eliminated 1,700 high density and medium density housing units from the Regional University Specific Plan and changed most of this area to low density. To compensate, the plan was changed to add a number of affordable units in the university area, but these may never be built and are for students and faculty, not the community.

d. The Sunset Industrial Area Plan is in the process of becoming the Sunset Area Plan with the Placer Ranch Specific Plan.

e. Development that died because of the near collapse of the world financial system in 2007-2008 may fail and stall again. Among other problems, there are not enough construction workers.

7. The EIR needs to assess the environmental impacts of what will happen if the PCCP is not implemented as planned including if it’s not adopted, including regarding farmland and agriculture.

a. We don’t know what the PCCP has planned for the area set to become its Potential Future Growth Area (PFG—see the attached PCCP map) has planned, including west of PCCP Valley/Foothill Divide. It appears that assessment of property owners to support the PCCP could encourage development.

8. The EIR needs to assess and project what happens during the implementation years of all plans.

a. Since 2007 Placer County been significantly modifying its plans to attract development that might not happen without economic incentives due to changing plans. For example, the Board of Supervisors changed Placer Vineyards to allow more development near the high voltage transmission lines, reasoning that EMF has not been proved to be harmful.

b. The Sierra Cub supports the original mitigation measures adopted for Placer Vineyards as well as specified Regional University mitigation.

c. Housing density also needs to be increased to enable housing affordability and to facilitate rail transit feasibility. Concentrated development would protect agricultural and open spaces, and managed grazing has been compatible with
vernal pools.

c. County plan modifications and housing needs need to be developed as trends and to be considered for environmental, sustainability, and other factors.

9. Fire prevention including the location and design of new development require re-analysis of current and proposed development plans. The growing rate and severity of both wild fire in the WUI, and fire in the Urban Interface, require this analysis now for the EIR and sustainability purposes.

10. The SACOG EIR process requires use of Envision Tomorrow, Urban Footprint or other appropriate models to assess both the environmental impacts and sustainability of different transportation, transit including hubs, housing including affordable housing and density changes, agriculture and open space, economic opportunity, VMT, GHG, and other factors in this comment.

Michael Garabedian
Placer Group Sierra Club
916-719-7296

PCCP map:

https://www.placer.ca.gov/DocumentCenter/View/9222/Placer-County-Conservation-Program-Designations-Map-PDF

Area sketch map: