

ECOS Transportation, Air Quality & Climate Change Committee Thursday, October 10, 2019, 6:00 p.m. Breathe California conference room, 909 12th St., Sacramento Note special location for this meeting only

Meeting Notes

The meeting was moved to the Sierra Club conference room, 909 12th St., second floor

6:00 p.m. — Welcome, Introductions, Check-Ins, and Changes to Agenda *Attendance: Delphine Cathcart (STAR), Oscar Balaguer (350 Sac, Sierra Club), May-Lin Chang (HGA, 350 Sac), Dan Allison, Walt Seifert (Sac Trail Net), Lynne Goldsmith (ECOS, 350 Sac), Mike Garabedian (Placer Co. Tomorrow), Alex Reagan (ECOS staff), Ralph Propper (ECOS Pres.), Jon Ellison (co-chair), John Deeter (co-chair).*

6:05 p.m. – Metropolitan Transportation Plan / Sustainable Communities Strategy

ECOS comment letter on the Draft 2020 MTP/SCS and Draft EIR, due Nov. 7

Deeter: The Draft MTP/SCS is only 59 pages long plus several long appendices, but the DEIR runs to nearly two thousand pages divided into 21 chapters.

Discussion: SACOG staff wants to accelerate drafting and adopting documents because of upcoming federal actions, but may be unable to shorten comment period. **Matt Baker** devoted many hours to writing comments on the 2016 Draft MTP/SCS, but he has other commitments and won't be able to help as much this time.

Deeter: Chapter 2 contains the Project Description. The Alternatives Analysis in Chap. 18 considers three scenarios in addition to the proposed Project: Sprawl, No Project (growth per 2016 MTP/SCS), and Infill (slightly more compact than the Project). An all-infill scenario was screened out and not evaluated. The Sprawl scenario would institute price controls on highways, which local jurisdictions would be loathe to adopt.

Discussion: Road pricing sounds like pie in the sky mitigation, and needs state and/or federal action to implement. SACOG is required to provide substantiation but road pricing is just mitigation on paper. **Clint Holtzen** (MTP/SCS Project Manager) has said that SACOG has no authority over Placer Co planning, and that only the northeast third of the Southeast Connector would be funded by this MTP/SCS. Appendix A of the MTP/SCS has 100 pages listing all the projects.

Garabedian: Will ECOS comment on the Placer Parkway? It's 15 miles through vernal pools, which Placer Co. is trying to fund with a half-cent sales tax increase. They also want to widen SR 65 thru Wheatland. There are three bad projects, which proponents want to fund by a vote in only three cities: Lincoln, Roseville, and Rocklin. Placer County Sustainability Plan is not a plan, really just a joke.

Discussion: Some assumptions in MTP/SCS are unlikely, such as neighborhood shuttles and free ranging autonomous vehicles. It is proposing solutions which will never come to pass. There is no over riding goal, such as those proposed by Transportation for America. **Q:** Isn't the overall vision encapsulated in Chapter 4? **A:** It's too vague, and should contain three principles at the top. Entire MTP is vague. **Q:** Does Newsom's Exec. Order on transportation funding and climate change have anything to do with the MTP/SCS? **A:** Streeetsblog had an article on it in its Oct 2 issue. The E.O. is on the Governor's website. It's very broad. It directs state agencies to develop guidelines. Will take a year for actual guidance to be on the street. The E.O. should be reflected in the MTP/SCS.

Allison: He comments on Chapter 4, Policies: pricing (number 13), state of good repair (17), things not paid for by new development (18), set aside specific percentage (e.g.0% for environmental justice) (23), and reduce VMT (25). but this should be listed as the first policy.

Discussion: Region is relying on federal money for improvements. If growth is not limited, transportation money will be withheld. List of projects in MTP is a negotiated list, which is why Southeast Connector is included. SACOG says it has to accept the jurisdictional General Plans as a given. "Green Means Go" proposal for state assistance to help meet regional GHG reduction target got no funding for the current fiscal year, but SACOG will try again next year. If state assistance is not forthcoming, GHG target drops to 18%. All scenarios considered in the Alternatives Analysis achieve 19% reduction, except for the Sprawl scenario which achieves only 12% reduction.

Deeter: Is willing to be the point person in collecting and collating comments on the Draft MTP/SCS, but can't do all the writing. Perhaps we can use Google docs and Google folders for our draft comments. **Reagan:** A Google spreadsheet might work better, with separate cells used by different people.

Discussion: All comments should be submitted by Oct 31, one week before the end of the comment period on Nov. 7. **Q:** Should there be separate letters for the MTP/SCS and the DEIR? Comments on MTP/SCS should be focused on improving language, and on the DEIR on whether the plan meets CEQA requirements **A:** Support for two letters. SACOG staff needs backing from environmental advocates to improve the plan.

Although SACOG is unlikely to make major changes based on comments, there is a opportunity to make this another outstanding document like the Blueprint. Lawsuits are usually addressed to the Final EIR, since CEQA requirements are quite specific, and there is no similar legal challenge on the plan itself. But we need to comment in order to provide basis for a lawsuit.

7:15 p.m. – Jackson Township Specific Plan Draft EIR

ECOS comment letter, due October 31

Balaguer: Proposes guidelines for reviewing the climate change element of the Draft EIR for the Jackson Township Specific Plan by 350 Sacramento, ECOS, and the Sierra Club. We must first consider Sacramento County's past greenhouse gas (GHG) reduction commitments going back to 2011. This DEIR is better than others in the past, but it still has three problems:

- 1. It inappropriately claims applicability of the County's Phase I Climate Action Plan
- 2. It inappropriately uses GHG reduction targets of general applicability
- 3. It is inconsistent with the County General Plan FEIR

We also have some project-specific concerns, and we have preliminarily concluded that

- 1. The Jackson Township DEIR fails its legal standards because it uses inappropriate targets, is inconsistent with the GP FEIR, presents piecemealed mitigation, presents deferred mitigation, and fails its informational function
- 2. The County's failure to provide its promised GHG mitigation impugns the validity of the GP The Administrative Process includes these steps:
 - a) Comments on the DEIR are due Oct. 31, we need to have a preliminary draft by Oct. 17.
 - b) *Final EIR is issued*, including responses to comments. If our comments are detailed and specific, detailed response is required. We can then assess the FEIR, and prepare rebuttals as appropriate.
 - c) County Review by Planning Commission and Board of Supervisors, and we testify as appropriate
 - d) **County adoption** and certification of the FEIR
 - e) 30-day statute of limitation to challenge FEIR

Our comments on the DEIR should include technical issues, such as electric vehicles, building energy, etc. We should **integrate our comments** with other ECOS committees, such as Land Use and Habitat 2020.

Should we sue? Assess at every step in the process.

Discussion: Many counties have climate action plans, but not Sacramento which obfuscates the issue by claiming part I of the General Plan is a CAP. Specific plans such as this need to show a specific climate element because Sac. Co. doesn't have a CAP. If action is taken against this specific plan, it might make the county adopt a climate plan.

Balaguer: Primary interest in this EIR is that it is an opportunity to demonstrate the nexus between Sac. Co.'s current development plans and its failure to take action 8 or 9 years ago. In 2011 the county updated its 2035 GP, and addressed GHG with growth authorized under the GP. It's a big deal to update a GP, Sac. City does it every 5 yrs, but not the county.

Q: What connection does this DEIR have to the MTP? **A:** Plans have to be consistent, and MTP forecasts a 19% reduction in GHG. **Balaguer:** But 19% is not incumbent on county, only entire region.

Discussion: Sprawl requires transportation infrastructure. But many expansion projects are not included in the MTP.

Balaguer: Requests that TAQCC get involved in commenting on the Jackson Township DEIR. **Ellison:** People should volunteer for commenting on a specific section of the DEIR. Somebody has to comment on the Final EIR so we can sue. **Discussion:** Someone should comment on the Southeast Connector. 350 Sacramento is involved in preparing comments.

Balaguer: Who should get initial draft mailed out on Oct 19? **Discussion:** Should comments go to ECOS Ex. Com.? Is this EIR worthy of legal challenge? Jackson Township should be high priority because of its overarching scope.

Propper: Volunteers to help with drafting comments. Habitat 2020 and Land Use committees are interested as well. **Balaguer:** Would be nice to have a joint comment letter with 350 Sac. and Sierra Club.

7:35 p.m. – Updates, reports and discussion of other current topics

- Mayors' Commission on Climate Change
- Proposed Electric Transportation Vision (Guy Hall)
- SacMoves Coalition to support a transportation tax for Sacramento County

Propper: Discussed Measure A-plus with **David Mogavero** earlier this week. yesterday, who advocates a major effort at the Sacramento Transportation Board meeting on Nov. 14 to promote a ballot measure heavily focused on transit and active modes (minimum 65%). **Deeter:** Suggests making this issue the main topic of the next TAQCC meeting on Nov. 7.

- Sacramento Valley Station Master Plan
- Elk Grove City and Sacramento County Climate Action Plans

7:40 p.m. – Other business and announcements / Topics for future meetings

7:45 p.m. (approx.) – Adjourn

Next TAQCC meeting: Thurs., Nov. 7, 6:00 p.m., Mogavero Architects, 1331 T St.

Other upcoming events of interest:

Oct. 12, 1 pm -- Sacramento Transit Riders Union (Sac TRU), 1714 Broadway
Oct. 17, 2 pm -- "Vehicle Miles Traveled in the Age of Amazon and Uber", UC Center
Sacramento Speaker Series, 1130 K Street, Room LL3.

Printable TAQCC agendas and minutes are available on the ECOS Web site.