



ECOS Transportation, Air Quality & Climate Change Committee
Thursday, March 7, 2019, 6:00 p.m.
Mogavero Architects, 2012 K Street, Sacramento

Meeting Notes

6:00 p.m. – Welcome, Introductions, Check-Ins, and Changes to Agenda

Attendance: Susan Herre, Briana Moland (City of Sac), Beilul Naizghi, Dan Allison (STAR), Jeffery Tardaguila (Dogfite), Ralph Propper (ECOS Pres.), Jon Ellison (co-chair), John Deeter (co-chair).

6:05 p.m. – Commenting on Draft Environmental Impact Reports

- **Jon Ellison** (TAQCC co-chair)
 - Purpose for commenting on environmental documents (5 min.)
 - Timeline for comments (5 min.)
 - Tips on making effective comments (15 min)
 - Reviewing past and/or drafting actual comments to current EIRs (20 min.)

Ellison: Emphasizes the need to comment on draft environmental documents for controversial projects, in order to provide the basis for legal challenges later. Provides an outline of his presentation, which is appended below. Other useful information is available at the Planning and Conservation League Website:

- [California Environmental Quality Act.](#)
- [CEQA Frequently Asked Questions.](#)
- [CEQA Public Participation.](#)

6:50 p.m. – Update of ECOS's Transportation Vision

- **John Deeter** (TAQCC co-chair)

Deeter: The ECOS Transportation Vision was developed over fifteen years ago, as a combination of a list of transportation policies developed by a working group and modeling akin to a Metropolitan Transportation Plan by Prof. Bob Johnston and his students at UC Davis. The modeling explored the effect of transit improvements, auto pricing (gasoline price), and limiting sprawl on mode splits (e.g., proportions of auto and transit use). It had a 50-year horizon, but frontloaded implementation to achieve rapid benefits. An effort to update the Transportation Vision has been underway for over three years, and needs to be completed as soon as possible.

Discussion: A fifty year horizon is too long, and should be much shorter such as the twenty year horizon for the MYP. The vision should emphasize reduced auto usage. It should be succinct with

only about five goals, and provide the basis for ECOS's position on issues such as the MTP/SCS and Measure A-plus (Sacramento County transportation sales tax).

Allison: *Circulated some suggestions prior to this meeting, and proposes several ideas that should be included in the Vision:*

- *No roadway expansion*
- *Economic vitality (infrastructure maintenance)*
- *Reduce parking requirements*
- *Transportation pricing*

Suggests forming a subcommittee to write a draft of the Vision update. Most work to be done via the internet, with provision for sharing documents.

Action: *Allison, Herre, Deeter, and Ellison volunteer to be on the Vision subcommittee. Deeter will set up a Google group to facilitate communications, and a Google folder for sharing documents.*

7:30 p.m. – Updates, reports and discussion of other current topics

- Metropolitan Transportation Plan / Sustainable Communities Strategy
- Mayors' Climate Commission
- Sacramento declaration of Climate emergency (proposed resolution)
- Coalition to support a better Measure B (transportation tax for Sac. County)
- “Electrify America” program in Sacramento
- Sacramento City and Elk Grove Climate Action Plans
- Discussions with Cal trans about its role in regional transportation planning

Sac Rt Forward: *The Sac Rt Board adopted the staff recommendations for bus route optimization at its meeting on Feb. 4th. Sac Rt would like to implement the new bus system this summer, but September is more likely.*

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

7:45 p.m. (approx.) – Adjourn

Next TAQCC meeting: Thurs., April 4, 6:00 p.m., Mogavero Architects, 2012 K St.

Other upcoming events of interest:

Mar. 9, 1 pm -- [Sacramento Transit Riders Union](#) (Sac TRU), 1714 Broadway

Printable TAQCC agendas and minutes are available on the ECOS [Web site](#).

Commenting on Environmental Documents

Jon Ellison, TAQCC committee co-chair

Purpose for commenting on environmental documents (6:00-6:05)

CEQA, or the California Environmental Quality Act, is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible.

The purpose of CEQA is to: Disclose to the public the significant environmental effects of a proposed discretionary project, through the preparation of an Initial Study (IS), Negative Declaration (ND), or Environmental Impact Report (EIR).

The Lead Agency must provide public notice of the availability of a draft EIR at the same time as it sends a Notice of Completion to Office of Planning and Research. Notice must also be given to all organizations and individuals who have previously requested such notice. Notice must be filed for posting with the County Clerk of the county in which the project is to be located. ([Public Resources Code §21092.3](#))

Notice will also be given by at least one of the following procedures:

- Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project.
- Posting of notices by the public agency on and off the site in the area where the project is to be located.
- Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.

My purpose: developing a cadre of people willing and able to review portions of environmental reports and draft comments for use by ECOS, especially regarding circulation elements, air quality and climate change

Division of labor – usually one person from ECOS is the lead person drafting comments, so the rest of us will provide our draft comments to that ECOS person who will compile a cogent comment to be submitted on ECOS letterhead

Frequently Asked Questions Handout

Timeline for comments (6:05-6:10)

Review periods for draft EIRs should not be less than 30 days nor longer than 60 days from the date of the notice except in unusual situations. The review period for draft EIRs for which a state agency is the Lead Agency or a Responsible Agency is at least 45 days unless the State Clearinghouse approves a shorter period.

Tips on making effective comments (6:10-6:20)

The written response must describe the disposition of significant environmental issues raised. In particular, the major environmental issues must be addressed in detail giving reasons why specific comments and suggestions were not accepted if a public agency

disagrees with the draft EIR. There must be good faith, reasoned analysis in response and conclusory statements unsupported by factual information is not sufficient.

Cannot screw up by making an “ineffective” comment, but some sort of comment must have been made by some entity regarding an issue before it can be challenged under CEQA; failure to comment on an issue will preclude a CEQA challenge regarding that issue.

It is perfectly OK to raise an issue in a comment with no support, since the burden of proof is on the project proponent to show why they dealt with it the way they did in their environmental report. Even you can provide evidence or facts in support of your comment, so much the better, but they can be provided later. Most important thing is that the issue is raised in comments.

Please do not let your “lack of expertise” prevent you from trying to comment on the environmental impact concerns you have.

- Objectively evaluate the project and be VERY specific; generalities can be dismissed with generalities
- Consider ways to avoid the impacts that concern you and enforceable ways to reduce the severity of those impacts (mitigation)
- Include suggestions for making the project better – goal should be to write something that forces them to respond to concerns in your comment in a future environmental document
- Point out inconsistencies in the document or data, including outdated information or errors in logic

PCL handouts, Formulating Comments on Environmental Impacts

Reviewing past and/or drafting actual comments to current EIR (6:20-6:40)

TAQCC Casino comments

Handout: Examples of Effective & Ineffective EIR Comments