



Post Office Box 1526 • Sacramento, CA • 95812 • (916) 444-0022

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