



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

November 11, 2024

Board Directors and James Corless, Executive Director
Sacramento Area Council of Governments

SUBJECT: Suggested Policy re Performance of Projects included in BLUEPRINT

Dear Board Directors and Executive Director Corless,

ECOS urges the SACOG board to adopt a policy in its 2025 Blueprint that requires agreement on specific project scope descriptions before the regional plan is finalized; agree that the projects, so described, will be alternatives considered in the NEPA/CEQA analyses; and requires the selected alternative to meet or exceed the greenhouse gas emission performance of the project modeled in the regional plan.

Because highway projects have such a large effect on GHG and air pollutant emissions, and because tolling of highway lanes is a key travel demand strategy/GHG strategy, that can make or break the region's ability to meet the State target established by the California Air Resources Board, this suggested policy is particularly important for Caltrans and SACOG.

ECOS is party to a lawsuit against Caltrans for the Yolo-80 Causeway project, in part, because it failed to consider as a NEPA/CEQA alternative the dual toll lanes that are described for the Yolo-80 project in the 2020 SACOG MTP/SCS.

Caltrans has an adopted policy that its managed lane projects must be included in adopted Regional Transportation Plans (RTP). From 2020, it is called the Managed Lane System Plan Guidelines. *"During the development of the MLSP, all appropriate System Planning documents, **particularly the RTP/SCS, DSMP, and corridor plans, shall be reviewed and integrated as appropriate to ensure identified corridor needs and planned improvements are accurately considered in the managed lanes system.**"*¹

Caltrans also has an adopted policy that its proposals for HOV lanes must be consistent with the RTP. From 2020, the High Occupancy Vehicle Guidelines for Planning, Design and Operations, states they must be *"Consistent with district management strategies as identified in the DSMP and the TCR. Consistent with objectives and strategies of the congestion management program. Supportive of regionally adopted Transportation Control Measures (TCMs) and with the approved Air Quality Management Plan (AQMP). **Consistent with the short- and long-term elements of the Regional Transportation Plan (RTP).**"*²

¹ Relationship between the MLSP and other System Planning Documents, page 3, https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/managed-lanes/mlsp-guidelines-102020_a11y.pdf, accessed 11/11/24.

² Section 1.3.1., <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/managed-lanes/hov/hov-guidelines-2020-a11y.pdf>, accessed 11/11/24

Caltrans, in the SACOG Transportation meeting on Nov. 7, 2024, expressed concern that the regional plan, through its specific project description, not lock in a specific alternative for a project prior to NEPA/CEQA analysis. Caltrans said the regional plan should include unspecific scope descriptions for projects, and if this would not be acceptable to SACOG, Caltrans would pull its projects out of the regional plan entirely. This threat is impractical. Being absent from the plan will likely make the projects ineligible for some federal funds and uncompetitive for others, and ineligible for State SB1 funds.

To preserve Caltrans' flexibility and protect SACOG's need to be able to count on a certain level of greenhouse gas emissions performance in its submittal to CARB for SB375 compliance, as well as the performance regarding criteria pollutants regulated under the Federal Clean Act, we propose that you insert performance language like the following into the 2025 Blueprint:

We realize there are a range of alternatives for constructing the managed lanes system.

A specific scope description has been included in the regional plan for estimating greenhouse gas emissions for SB375 compliance.

*Following the environmental analysis, Caltrans will choose the alternative to implement, **but if it differs from the SACOG plan, it must meet or exceed the greenhouse gas emission performance modeled in the regional plan, through its direct impacts and/or mitigation strategy.** It also must meet or exceed Federal Clean Air Act requirements for criteria pollutants.*

To facilitate this, Caltrans will communicate to SACOG in a timely manner regarding any proposed projects that are inconsistent with SACOG's regional plan; and SACOG staff will identify in writing to Caltrans and other relevant entities any inconsistencies between Caltrans' proposed projects and SACOG's regional plan.

Thank you for your consideration of this suggestion.



Susan Herre AIA AICP
President of the Board of Directors