

2014



Madera County Transportation Commission

Final Program Environmental Impact Report
for the 2014 Regional Transportation Plan &
Sustainable Communities Strategy

July 11, 2014

Final Program Environmental Impact Report
for the
**MCTC 2011 Regional Transportation Plan and
Sustainable Communities Strategy**

July 11, 2014

Prepared For:



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SECTION 1.0 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a Final Program Environmental Impact Report (Final PEIR) must be prepared, certified, and considered by decision-makers prior to taking action on a project. The Final PEIR provides the Madera County Transportation Commission (MCTC) with an opportunity to respond to comments received on the Draft PEIR and to incorporate any changes or additions necessary to clarify and/or supplement the information contained in that document. This Final PEIR, therefore, represents the culmination of all environmental related issues raised during the comment period on the Draft PEIR for the MCTC 2014 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). In addition, this Final PEIR contains the Statement of Overriding Considerations (Appendix A), which identifies the significant, adverse, and unavoidable impacts in the Draft PEIR. Finalize a Mitigation Monitoring and Reporting Program (Appendix B) is included that identifies the necessary processes that are required to ensure that the mitigation measures recommended in the Draft PEIR are implemented. The MCTC Board of Directors is required to balance the benefits of the proposed Project (2014 RTP and SCS) against its unavoidable environmental risks in determining whether to approve the project.

1.1 FORMAT AND SCOPE

This document has been prepared by VRPA Technologies, Inc. (VRPA) to address the required components described above. The fifty-five day Draft PEIR review and comment period began on March 21, 2014 and ended on May 15, 2014. Comments received and staff response to those comments are contained in Section 2 of this Final PEIR. Section 3 provides a listing of changes, additions, and corrections to the Draft PEIR recommended by VRPA. Such changes, additions, and corrections are necessary to address revisions resulting from written comments on the Draft PEIR. In addition, this document also includes a Statement of Overriding Considerations (Appendix A), and the Mitigation Monitoring and Reporting Program (reference Appendix B).

The Final PEIR is composed of the following documents:

- ✓ MCTC 2014 Regional Transportation Plan and Sustainable Communities Strategy, Draft Program Environmental Impact Report, May 1, 2014
- ✓ MCTC 2014 Regional Transportation Plan and Sustainable Communities Strategy, July 11, 2014
- ✓ Madera County Conformity Analysis, July 11, 2014
- ✓ MCTC Regional Transportation Plan and Sustainable Communities Strategy, Final Program Environmental Impact Report, July 11, 2014

1.2 PROJECT DESCRIPTION

The Project, as defined by CEQA Statutes, Section 21065, is the preparation of the 2014 RTP and SCS. MCTC has prepared the RTP and SCS as required by Section 65080 et seq., of Chapter 2.5 of the California Government Code as well as federal guidelines pursuant to the requirements of the Moving Ahead for Progress in the 21st Century (MAP 21), and the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). The RPT and SCS must also meet Transportation Conformity for the Air Quality Attainment Plan per 40 CFR Part 51 and 40 CFR Part 93. In addition, the RTP and SCS must address requirements set forth in Assembly Bill 32, The California Global Warming Solutions Act of 2006. Finally, the California Transportation Commission has prepared guidelines (most recently revised in April 2010 including an Addendum addressing Climate Change and Greenhouse Gas Emissions adopted by the Commission on May 29, 2008) to assist in the preparation of the RTPs pursuant to Section 14522 of the Government Code.

As the designated Regional Transportation Planning Agency (RTPA), MCTC is mandated by state and federal law to update the RTP every four years. The last comprehensive EIR on the RTP was completed in July 2010, which addressed transportation improvement projects, programs, and funding from federal, State, and local sources including additional funding from the ½ Cent Sales Tax measure (Measure “T” Extension). Measure “T” did receive the 2/3rds voter approval required in order to pass in the November 2006 election. The 2014 RTP PEIR has been prepared to address possible environmental impacts resulting from implementation of the 2014 RTP and SCS and to incorporate for the first time, the Sustainable Communities Strategy (SCS).

The RTP is used to guide the development of the Regional Transportation Improvement Program (RTIP). The RTIP is the programming document used to plan the construction of regional transportation projects and requires State Department of Transportation (Caltrans) approval. No project-level assessments of environmental impacts are addressed by this PEIR. The RTP is also used as a transportation planning document by each of the sixteen member jurisdictions of MCTC. Member jurisdictions include the County of Madera and the cities of Chowchilla and Madera.

The RTP and SCS identifies the region’s transportation needs and issues, sets forth an action plan of projects and programs to address the needs consistent with the adopted policies and documents the financial resources needed to implement the plan. Additional areas of emphasis and policy initiatives in the 2014 RTP and SCS includes the SCS. In addition, the 2014 RTP and SCS includes updated project lists and updated performance measures.

The 2014 RTP and SCS consists of required elements referenced in the enabling legislation and is organized into various sections noted below.

- ✓ [*Chapter 1: The 2014 RTP and SCS – A Summary*](#) – provides a brief summary of the RTP and SCS reflecting the major findings and recommendations found in each chapter of the Plan
- ✓ [*Chapter 2: Requirements, Trends & Contents*](#) – describes the purpose of the RTP and SCS process, associated mandates, the existing transportation system in Madera County, and the contents of the Plan itself
- ✓ [*Chapter 3: The Madera Region: Past, Present, & Future*](#) – provides a comprehensive overview of the Region including growth and development, and planning forecasts and assumptions
- ✓ [*Chapter 4: A Shared Vision*](#) - provides a comprehensive listing of goals, objectives, and strategies that address the short- and long-term mobility and accessibility needs and planning requirements for the County
- ✓ [*Chapter 5: Delivering the Plan*](#) - provides a comprehensive assessment of needs and issues considering the goals and objectives contained in Chapter 4 – “A Shared Vision”, describes the air quality conformity requirements and issues, includes a multimodal element addressing the needs and issues, inventory, accomplishments, and an assessment of future demand for all modes of transportation including highways and arterials, mass transportation, aviation, non-motorized systems, goods movement, TDM, and ITS needs and analysis. The Element also contains the actions necessary to support the goals and objectives referenced in the Policy Element and in the needs assessment
- ✓ [*Chapter 6: Creating a Sustainable Future*](#) - Involves working with our partners, local governments, and stakeholders to identify a transportation system supported by a land use pattern that reduces vehicle trips, vehicle miles traveled (VMT), and greenhouse gas emissions and addresses requirements set forth in SB 375
- ✓ [*Chapter 7: Investing In Change*](#) - provides a thorough assessment of project costs and revenue assumptions for each mode of transportation. The RTP must be financially constrained in accordance with air quality conformity requirements. As such, this chapter must ensure that projects, which are needed to enhance mobility and accessibility throughout the County, are also financed within the timeframe of the Plan (year 2040) and reduce air emissions consistent with reduction targets. This chapter also includes a description of unmet transportation needs, maintenance and operation needs, and the potential for new financing strategies/sources of funding to address revenue shortfalls, if applicable
- ✓ [*Chapter 8: Public Involvement for Change*](#) – includes a thorough review of the public involvement and community outreach program for the Project
- ✓ [*Chapter 9: Environmental Compliance*](#) – Describes the environmental review process followed to environmental assess impacts associated with the 2014 RTP and SCS.

- ✓ [Chapter 10: Addressing Environmental Justice](#) – Reviews potential impacts and strategies to avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations resulting from implementation of the RTP and SCS. This Chapter also discusses efforts by MCTC to ensure the full and fair participation by all potentially affected communities in the transportation decision making process.
- ✓ [Chapter 11: Measuring Up](#) - provides a description of the various monitoring programs that will be used by MCTC to monitor the performance of the regional transportation system
- ✓ [Chapter 12: San Joaquin Valley Regional Transportation Overview](#) - included to document and facilitate coordination of interregional transportation planning and air quality attainment
- ✓ [Appendices](#) - includes the technical and other appendices detailing the methodologies applied, a glossary of terms, and other supportive information

SECTION 2.0 WRITTEN COMMENTS AND FINAL RESPONSES TO COMMENTS

(Comment letters received are provided beginning on Page 2-160)

Comment Letter (Email) #1

FROM: Debra Mahnke, Water Resource Control Engineer, Central Valley Regional Water Quality Control Board, Debra.Mahnke@waterboards.ca.gov

DATED: May 7, 2014

RESPONSE #A Thank you for your comments. The Mitigation Measure number referenced in the comment letter is incorrect. The Mitigation Measure intended to be referenced is Mitigation Measure 3.11.1 in the Draft PEIR. Referencing Chapter 3 of the Draft PEIR, Section 3.11, Page 3-261, Mitigation Measure 3.11.1: the Draft PEIR has been revised to add the following paragraphs to Mitigation Measure 3.11.1:

Recent court rulings and U.S. EPA rulings have diminished which water bodies are recognized as waters of the U.S. Because of this, many projects impact water bodies, including wetlands, considered non-jurisdictional; and therefore, not regulated by the Clean Water Act. These water bodies, however, are considered waters of the State, and are regulated by the California Water Resources Control Board under the Porter-Cologne Water Quality Control Act.

Additionally, any project that requires a discretionary permit from a state agency requires compliance with the California Environmental Quality Act.

Comment Letter (Email) #2

FROM: Debra Mahnke, Water Resource Control Engineer, Central Valley Regional Water Quality Control Board, Debra.Mahnke@waterboards.ca.gov

DATED: May 8, 2014

RESPONSE #A Thank you for your comment. Comment noted.

Comment Letter #3

FROM: Diana Gomez, Central Valley Regional Director, California High-Speed Rail Authority, 2550 Mariposa Mall, Suite 3015, Fresno, CA 93721

DATED: May 29, 2014

This comment letter and the following response apply only to the 2014 RTP/SCS and are not related to the Draft or Final PEIR.

RESPONSE #A Thank you for your comments. Chapter 5 of the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) - Delivering the Plan for Change, has been revised to reflect the following statements related to high-speed rail:

The Authority's 2014 Business Plan and the 2013 California State Rail Plan state that high-speed rail passenger service from Merced to the San Fernando Valley will begin in 2022. Therefore, construction of high-speed rail through Madera County is scheduled for completion by the end of 2022.

The Final Environmental Impact Report/Environmental Impact Statement for the Merced to Fresno high-speed rail service was certified by the Authority's Board of Directors on May 3, 2012. The Final EIR/EIS is available at <http://www.hsr.ca.gov>.

RESPONSE #B RTP and SCS, Chapter 5 or Chapter 6 (Creating a Sustainable Future) has not been revised to reflect reductions in greenhouse gas emissions (GHG) for Madera County since the high-speed train will not be stopping in Madera County to load and unload passengers. High-speed train patrons will still drive or take transit to the Fresno or Merced high-speed train stations to access trains. It is not expected that a significant number of passengers will take transit or carpool to those stations from Madera County. Therefore, vehicle trip and vehicle miles traveled (VMT) reductions, as a result of the high-speed train running through Madera County, are not expected.

Comment Letter #4

FROM: Jennifer Bryan-Sanchez, Transportation Planning North Branch, District 6, State of California - Department of Transportation, 1352 West Olive Avenue, P.O. Box 12616, Fresno, CA 93778-2616

DATED: June 9, 2014

This comment letter and the following response apply only to the 2014 RTP/SCS and are not related to the Draft or Final PEIR.

RESPONSE #A Thank you for your comments. Chapter 1, The 2014 RTP and SCS – A Summary, Page 1-21, Environmental Justice Communities has been added to the list of efforts to achieve consultation and coordination.

RESPONSE #B Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS), Chapter 5, Delivering the Plan for Change, Page 5-6 under Highway Arterial Performance - MCTC received the comments as a request from Madera County Transportation Commission (MCTC) staff to Roundtable Committee members to provide comments on draft criteria. Based upon the comments received from Caltrans and other Roundtable members, MCTC staff and its consultant prepared revised criteria and presented the criteria to the Roundtable for approval. The criteria was approved by the Roundtable as presented. No further action was taken. The criteria were then applied to the list of candidate improvement projects as reflected in the RTP.

RESPONSE #C Chapter 5 has been amended to include the following acknowledgement of the findings of the Yosemite, Sequoia and Kings Canyon National Park Transit Market Assessment and Feasibility Study:

The results of the feasibility assessment indicate that substantial amounts of demand exist for both the Fresno-Yosemite route and the Fresno-Sequoia/Kings Canyon route.

RESPONSE #D Chapter 5 has been amended to include the following discussion regarding when the next Short Range Transit Plan update will take place:

MCTC has indicated the Short Range Transit Plan will be updated as part of the 2014/2015 fiscal year Overall Work Program.

RESPONSE #E Chapter 5 has been amended to include a discussion pertaining to an Active Transportation Plan. The following has been added to Chapter 5, Section 5.7 - Non-Motorized Transportation on page 5-98 as a proposed action for future planning activities:

“Bikeways and pedestrian facilities, including trails, have become increasingly important to the Madera County region over the past several years largely because of air quality, economic development and quality of life (health) considerations. Consequently, MCTC has become more involved in integrating active transportation into the regional transportation planning processes. Recognizing walking and bicycling as healthy, accessible and sustainable forms of transportation, MCTC will embark on a new effort to develop a Regional Active Transportation Plan (ATP), which will integrate member agency complete Bicycle Master Plans combined with targeted pedestrian and safe routes to school planning efforts. The Regional ATP will guide efforts to improve bicycling and walking conditions at the local level throughout the Madera County region and will serve as a blueprint for the future of walking and bicycling in the region. The Plan will provide a countywide understanding of existing conditions and countywide priority bicycle and pedestrian networks as well as existing conditions analysis and recommended network for the unincorporated areas in Madera County and each of the MCTC member agencies. Developing an ATP will require coordination and collaboration with a variety of active transportation stakeholders and elected officials that will essentially form an Active Transportation Subcommittee. The Regional ATP will be the roadmap for developing pedestrian and bicycle infrastructure in the region, with an emphasis on promoting walking and bicycling as viable transportation options and fostering a practical, safe, and enjoyable environment that will encourage walking and bicycling for recreational and commuter trips with the goal to establish specific policies and programs.”

RESPONSE #F RTP and SCS, Chapter 5, Page 5-42, the following goal has been added as recommended:

Prepare an Active Transportation Plan (ATP) to define strategies to secure Active Transportation Program funding.

This goal has also been added as a mitigation measure to Chapter 3, Section 3.17.

RESPONSE #G RTP and SCS, Chapter 10 (Addressing Environmental Justice), Introduction - MCTC has added the following sentence at the end of the section:

MCTC will continue to consult and coordinate with the various Native American Tribes within Madera County. It is crucial that MCTC and these organizations work together to identify transportation needs including the provision of transit services, necessary highway and road improvements, and improvements that address known safety issues. MCTC will examine the future necessity of forming an Environmental Justice Committee to further build upon current community collaboration to enhance anticipated planning efforts.

MCTC does, and will continue to consider and address the impacts of its planning activities on environmental justice (EJ) communities within Madera County and to request and seek input from these communities. All major planning efforts include outreach to EJ communities including the provision of workshops and presence at events in their neighborhoods while working with and through local representative Community Based Organizations (CBOs).

MCTC is committed to conducting transportation planning activities that are mindful of EJ topics and communities. MCTC further understands that addressing the needs and concerns of EJ communities requires multiple strategies and efforts. To this end, MCTC has made significant efforts to provide for inclusion and participation from individuals and groups within EJ communities.

MCTC adheres to all directives regarding EJ and will work closely with regional partners/stakeholders to identify ways to improve our EJ analysis, as feasible and appropriate. An environmental justice analysis was completed and is included in Chapter 10 of the RTP and SCS.

RESPONSE #H

RTP and SCS, Chapter 10 (Addressing Environmental Justice), Multiple Modes of Transportation, Page 10-2 - the following paragraph has been added as recommended:

In addition to transit services conducted by public transit providers, Native American Tribes are also planning for the provision of transit services including development of the North Fork Rancheria's transportation center and transit services program. In addition, the Picayune Rancheria of the Chukchansi Indians provide transit services to and from the Chukchansi Casino and Resort from Fresno, other central California regions, and from Modesto, stopping in Madera and continuing to the Casino.

CalVans is also available to provide commute vanpooling within Madera County and to employment centers in other counties throughout the Valley.

RESPONSE #I RTP and SCS, Chapter 10 (Equity Analysis), Page 10-5, American Indian and Alaskan Native - the definition has been revised as recommended:

A person having origins in any of the original people of North, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition.

RESPONSE #J RTP and SCS, Chapter 5, RTP/SCS Project Evaluation Criteria - reference Response to Comment #4B above. In addition, the list of prioritized projects has been included in the Final RTP and SCS as Appendix A and is referenced in Chapter 5, Page 5-6. Interchange projects were included with the capacity increasing projects. Only projects funded using funding sources other than local funds were evaluated.

RESPONSE #K Project evaluation criteria already contained criteria that provided higher point scores to improvement projects that directly provided access to employment centers and to essential services. Additional criteria related to a job/housing balance was not necessary.

RESPONSE #L Referencing the RTP and SCS, Chapter 2, Page 2-10 - the Traffic Model was applied to identify segment level of service (LOS). The model results do provide a general sense of segment LOS along the “regional” network and the model LOS methodology does consider various parameters referenced in Chapter 2 of the RTP and SCS. The reference to the number of segments at LOS E or F has been changed from two (2) to three (3) on Page 2-10.

RESPONSE #M Subsequent analysis of segment LOS is always required beyond the general LOS results shown in the RTP and SCS. Detailed analysis of each improvement project referenced in the RTP and SCS will be required [as noted in the Draft Program Environmental Impact Report (PEIR)]. In addition, various corridor studies and traffic impact assessments will be conducted to further detail traffic impacts and to provide input into the design process.

RESPONSE #N Referencing the RTP and SCS, Chapter 5, Exhibits 5-5 through 5-8 - these exhibits identify remaining deficiencies “after” the improvement projects noted in Table 5-2 are applied or reflected in the traffic model. The corridor improvements referenced beginning on Page 5-17 include projects listed in Table 5-2, as well as other improvements necessary to address corridor deficiencies and/or safety issues over the next twenty-six (26) years.

- RESPONSE #O** MCTC is currently in the process of reviewing the regional traffic model. The deficiencies reflected in the 2014 RTP and SCS are not and should not be as great as the number of deficiencies referenced in the 2011 RTP. This result was expected because the 2014 RTP and SCS 2040 traffic model socioeconomic data is reflective of State Department of Finance population projections (265,161 - 2040) that are considerably lower (approximately 78,877 people lower) than the population projections utilized for development of the 2011 RTP (344,028 for 2040). The resulting population reduction between the 2011 and 2014 RTPs has had a significant effect on trip making within Madera County, resulting in lower future traffic volumes and fewer LOS deficiencies.
- RESPONSE #P** Agree that the statement regarding ramp metering in Chapter 5, Page 5-20 of the RTP and SCS should be removed.
- RESPONSE #Q** Reference Response to Comment #4O.
- RESPONSE #R** The RTP Checklist has been updated to include final page numbers and content locations, where applicable.
- RESPONSE #S** MCTC has identified a number of projects that will reduce greenhouse gas (GHG) emissions including bike and pedestrian improvements, increased densities Countywide, even higher densities within the City of Madera and the Southeast Madera County New Growth Area, and enhanced transit service. Compared to the 2011 RTP, funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent. As an example, MCTC has earmarked funding to SCS Funding Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips. It is expected that once the traffic model is reviewed, that MCTC will be closer to meeting the GHG emissions reduction targets established by the California Air Resources Board (CARB). Once the model is reviewed, MCTC will continue to work with CARB to develop the Alternative Planning Strategy (APS) consistent with Senate Bill (SB) 375.
- RESPONSE #T** A statement to the effect that the RTP is consistent with the Public Transit-Human Services Plan has been added to Chapter 5, Page 5-26 of the RTP and SCS.
- RESPONSE #U** While the RTP reflects the effective date of the legislation, the RTP and SCS, Chapters 1 (Page 1-17) and 6 (Page 6-2) has been revised to reflect the actual date that SB 375 was signed into law or September 30, 2008.

RESPONSE #V The following paragraph has been added to the RTP and SCS, Chapter 1, Page 1-19 and Chapter 7, Page 7-2 regarding the extension of Measure T:

It is acceptable practice to identify funding sources that are reasonably expected to be available during the planning period. Measure T is the second transportation sales tax measure passed in Madera County that provides ½ percent sales tax proceeds for transportation projects and programs. It is therefore expected that Measure T will be renewed by or prior to the year 2026. Financial assumptions are always based on uncertainty and the federal and state funding sources used to develop the financial constrained revenue projections are all also based on assumptions that Congress and the State of California will continue to appropriate funds. When funding sources or programs are eliminated, or when Congress passes new transportation reauthorization legislation, the RTP is updated to reflect those changes.

RESPONSE #W There are currently no major steps being taken to ensure that Measure T will be extended or renewed. The current measure does not sunset until Fiscal Year 2026/27. As a result, the focus now is to ensure that projects and programs included in the Measure T Investment Plan are funded and constructed over the next twelve (12) years as promised to the voters in Madera County.

RESPONSE #X Agree. MCTC is complying with SB 375 with development of the 2014 RTP and SCS and the Alternative Planning Strategy (APS). Following adoption of the RTP and SCS, MCTC will continue to review the traffic model and coordinate with CARB to develop the APS.

RESPONSE #Y RTP and SCS, Chapter 1, Page 1-6 - the reference to the number of fixed-based operators (FBOs) has been corrected to reflect 18 FBOs.

RESPONSE #Z RTP and SCS, Chapter 1, Page 1-14 - the last sentence under Goods Movement Needs and Actions, has been revised as follows:

Air cargo operations at the Chowchilla and Madera Municipal Airports are desirable.

RESPONSE #AA RTP and SCS, Chapter 5, Page 5-34 - the date associated with the Regional Aviation System Plan has been changed to 2011.

RESPONSE #BB RTP and SCS, Chapter 5, Page 5-34 - thank you for the comments.

RESPONSE #CC RTP and SCS, Chapter 5, Page 5-36 - reference to the Madera County Comprehensive Airport Land Use Plan – the reference has been revised to reflect the year the Plan was approved or 1993 and that the County of Madera is currently in the process of updating the plan.

Comment Letter #5

FROM: Christopher L. Campbell, Attorney at Law, Baker Manock & Jensen, Client Liberty Groves LLC, Fig Garden Financial Center, 5260 North Palm Avenue, Fourth Floor, Fresno, CA 93704

DATED: June 23, 2014

This comment letter and the following response apply only to the 2014 RTP/SCS and are not related to the Draft or Final PEIR.

RESPONSE #A

Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS), Chapter 5, Page 5-20, Private Development Improvements – the section in the RTP and SCS only refers to developer contributions as conditions of approval and does not include traffic impact fee contributions. To clarify that development should not pay twice for the same improvements, the following sentence has been added at the end of the paragraph:

Local agencies shall ensure that new development does not pay traffic impact fees for the same facilities that it is designing and constructing as conditions of project approval.

It is not possible for MCTC to identify the specific source of local funding for transportation improvement projects without reflecting the entire impact fee program approved by each of the three (3) local agencies (cities of Chowchilla and Madera, and Madera County). There are a number of local funding sources that can be allocated to individual improvement projects.

RESPONSE #B

MCTC is currently in the process of reviewing the regional traffic model. The deficiencies reflected in the 2014 RTP and SCS are not and should not be as great as the number of deficiencies referenced in the 2011 RTP. This result was expected because the 2014 RTP and SCS 2040 traffic model socioeconomic data is reflective of State Department of Finance population projections (265,161 - 2040) that are considerably lower (approximately 78,877 people lower) than the population projections utilized for development of the 2011 RTP (344,028 for 2040). The resulting population reduction between the 2011 and 2014 RTPs has had a significant effect on trip making within Madera County, resulting in lower future traffic volumes and fewer LOS deficiencies along the major corridors listed in the comment letter.

RESPONSE #C

RTP and SCS, Chapter 6, Sustainable Communities Strategy - MCTC has identified a number of projects that will reduce greenhouse gas (GHG) emissions including bike and pedestrian improvements, increased densities Countywide, even higher

densities within the City of Madera and the Southeast Madera County New Growth Area, and enhanced transit service. Compared to the 2011 RTP, funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent. As an example, MCTC has earmarked funding to SCS Funding Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips. It is expected that once the traffic model is reviewed, that MCTC will be closer to meeting the GHG emissions reduction targets established by the California Air Resources Board (CARB). Once the model is reviewed, MCTC will continue to work with CARB to develop the Alternative Planning Strategy (APS) consistent with Senate Bill (SB) 375.

Growth (population and employment) allocated as part of the RTP and SCS modeling process was accomplished in consultation with each of the local agencies (Madera County, and the cities of Chowchilla and Madera) and consistent with the adopted general plans of each of the local agencies. Growth and development is expected to occur in the foothill portion of Madera County in accordance with the adopted general plans and approved land use development agreements. Growth to the foothill area has not been allocated to areas not designated or zoned for development. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out such entitled projects, MCTC would not be properly recognizing the County's land use authority.

RESPONSE #D

RTP and SCS, Chapter 7, Measure T - it is an acceptable practice to identify funding sources that are reasonably expected to be available during the planning period. Measure T is the second transportation sales tax measure passed in Madera County that provides ½ percent sales tax proceeds for transportation projects and programs. The current Measure passed with a success rate of over 70% as voters strongly believe that promises made are promises kept. It is therefore expected that Measure T will be renewed by or prior to the year 2026. Financial assumptions are always based on uncertainty and the federal and state funding sources used to develop the financially constrained revenue projections are all also based on assumptions that Congress and the State of California will continue to appropriate funds. When funding sources or programs are eliminated, or when Congress passes new transportation reauthorization legislation, the RTP is updated to reflect those changes.

There are currently no major steps being taken to ensure that Measure T will be extended or renewed. The current measure does not sunset until Fiscal Year 2026/27. As a result, the current focus is to ensure that projects and programs

included in the Measure T Implementation Plan are funded and constructed over the next twelve (12) years as promised to the voters in Madera County.

RESPONSE #E RTP and SCS, Chapter 7, Coordination of Development – A delivery schedule of street and highway projects has been added to Chapter 7.

RESPONSE #F MCTC has and continues to coordinate with Fresno Council of Governments (COG), Fresno County, and the City of Fresno regarding transportation issues that affect both counties. MCTC and Fresno COG have or are currently working together and/or with other Valley agencies on the following studies or planning efforts:

- ✓ Fresno-Madera East-West Corridor Study – Phase 1 and 2
- ✓ San Joaquin Valley Goods Movement Action Plan
- ✓ San Joaquin Valley Interregional Goods Movement Plan
- ✓ San Joaquin Valley Regional Blueprint
- ✓ San Joaquin Valley Intelligent Transportation System Strategic Plan
- ✓ Route 99 Corridor Business Plan
- ✓ Yosemite, Sequoia and Kings Canyon National Park Transit Market Assessment and Feasibility Study
- ✓ Fresno-Madera Origin Destination Study (proposed)

Comment Letter #6

FROM: Vincent P. Mammano, Division Administrator, U.S. Department of Transportation, Federal Highway Administration

DATED: June 23, 2014

This comment letter and the following response apply only to the 2014 RTP/SCS and are not related to the Draft or Final PEIR.

RESPONSE #A Thank you for your interest in the MCTC 2014 RTP and SCS. MCTC appreciates your time and will be sure to keep you updated throughout the regional transportation planning process.

Comment Letter #7

FROM: Arnaud Marjollet, Director of Permit Services for Chay Thao, Program Manager, Central Region (Main Office), San Joaquin Valley Air Pollution Control District, 1990 E. Gettysburg Avenue, Fresno, CA 93726-0244

DATED: June 23, 2014

Thank you for your comments.

RESPONSE #A Draft PEIR, Chapter 3, Section 3.4, Pages 3-49 through 3-50 - the references to the 2007 Ozone Plan and 2008 PM_{2.5} Plan were corrected to reference the District's 2013 Ozone Plan and the 2012 PM_{2.5} Plan.

RESPONSE #B Draft PEIR, Chapter 3, Section 3.4, Page 3-54 - the statement that mobile sources (on-road and off-road) contribute to 64% of all NO_x and 53% of all ROG emitted from anthropogenic sources in the valley has been revised to reflect data from Appendix I of the District's 2013 Ozone Plan, which states that in 2015, mobile source (on-road and off-road) will contribute to 83% of the Valley's NO_x and 22% of the Valley's ROG emissions.

RESPONSE #C Draft PEIR, Chapter 3, Section 3.4, Page 3-60, Table 3-13 - the Madera County Attainment Status was corrected to show designations/classifications available on the District's website at: valleyair.org/aqinfo/attainment.htm.

RESPONSE #D Draft PEIR, Chapter 3, Section 3.4, Page 3-85 - the PM₁₀ designation associated with Madera County was corrected to state that Madera County is a maintenance area for PM₁₀.

RESPONSE #E Draft PEIR, Chapter 3, Section 3.4, Page 3-76 - the statement that the attainment year for both the 1997 and 2006 PM_{2.5} NAAQS is 2014 has been revised to correctly state that for PM_{2.5}, the attainment year for the 1997 NAAQS is 2015 based on data from 2012-2014. The attainment year for the 2006 NAAQS is 2015 based on data from 2013-2015.

RESPONSE #F Draft PEIR, Chapter 3, Section 3.4, Page 3-43, Table 3-4, was revised to include the source of the data provided, which is the California Air Resources Board (6/4/2013).

RESPONSE #G Draft PEIR, Chapter 3, Section 3.4, Pages 3-50 through 3-51, Tables 3-5 through 3-7 were revised to include the source of the data provided, which is the Conformity Analysis 2015 FTIP/2014 RTP.

RESPONSE #H Draft PEIR, Chapter 3, Section 3.4, Pages 3-54 through 3-55 – The percentages of CO and **PM₁₀** emissions contributed by mobile sources were revised and included as reference to the Air Resources Board (CARB).

RESPONSE #I Draft PEIR, Chapter 3, Section 3.4, Page 3-82 - the statement that PM10 reductions will be minimal when comparing 2010 emissions to the 2040 Build Option has been revised to state that PM₁₀ emissions will slightly increase from 0.35 tons per day to 0.36 tons per day.

RESPONSE #J Draft PEIR, Chapter 3, Section 3.4, Page 3-77, Table 3-17 - the 2014 emissions budget for the 1997 and 2006 PM_{2.5} NAAQS were corrected to reference 8.1 tons per day as the emissions budget for the years 2017, 2025, 2035, and 2040.

RESPONSE #K Draft PEIR, Chapter 3, Section 3.4, Page 3-64 - the statement “The CARB 2008 PM_{2.5} Plan...” has been corrected to state “The District’s 2008 PM_{2.5} Plan.”

RESPONSE #L Draft PEIR, Chapter 3, Section 3.4, Page 3-80 – the reference to the “2014 FTIP” was corrected to reference the “2015 FTIP.”

Comment Letter (Email) #8

FROM: Barbara River at rivbar44@yahoo.com

DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions requires subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS. The Madera County Transportation Authority (MCTA) has the option of managing Measure T Regional Transportation Program projects should Caltrans or local agencies decide to not implement the projects themselves or if they are found to not be in compliance with Measure T requirements including the schedule for project implementation. Such a change in responsibilities would require approval of the MCTA Governing Board, which is composed of the County Board of Supervisors, and Madera and Chowchilla City Council representatives.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with the California Air Resources Board (CARB).

Comment Letter (Email) #9

FROM: Ellen Williams at ellenjanw@gmail.com

DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the Regional Transportation Planning Agency (RTPA) is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate

mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with the California Air Resources Board (CARB).

Comment Letter (Email) #10

FROM: Marc Agabashian and Veronica Agabashian at purpleasphodeleye@gmail.com
DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the Regional Transportation Planning Agency (RTPA) is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future

population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Comment Letter (Email) #11

FROM: Michaela Agabashian at purpleasphodeleye@gmail.com

DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the Regional Transportation Planning Agency (RTPA) is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

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population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Comment Letter (Email) #12

FROM: Samuel Molina at 100stm001@gmail.com

DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

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The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future

population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Comment Letter (Email) #13

FROM: Ed Estes at edwardestes@aol.com

DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future

population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

It should be noted that many of the developments proposed in the Rio Mesa area include both residential and non-residential land uses. Retail shopping centers as well as employment generating land uses are currently proposed. Therefore, a significant amount of tax revenues are expected to remain in Madera County.

While traffic is expected to increase along SR-41 through Madera County whether or not Rio Mesa developments are constructed, Caltrans is considering options for increasing capacity along SR-41 in the future. Potential options include widening of the existing SR-41 as well as alternative freeway alignments to be funded through developer contributions and/or traffic impact fees through Madera County's Traffic Impact Fee Program. These SR-41 improvements would be designed to provide mobility for recreational travel, as well as travel to/from the foothills, Fresno, Madera Ranchos, City of Madera, and the Southeast Madera County New Growth Area developments.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Comment Letter (Email) #14

FROM: Jean Hays at skyhorse3593@sbcglobal.net

DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Comment Letter (Email) #15

FROM: Berl Hubbell at jayhubbell@comcast.net

DATED: June 24, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

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Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality

conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with the California Air Resources Board (CARB).

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans.

Public transportation is currently provided in many areas of Madera County. In addition, there are transportation improvements included in the proposed 2014 RTP and SCS including proposed transit improvements that would encourage optimized use of public transportation, and enhanced transit programs with new routes that would operate at higher speeds. Growth patterns that promote alternatives to the automobile by creating mixed-use developments, which would include residences, shops, parks, and civic institutions, linked to pedestrian and-bicycle friendly public transportation centers, are also discussed in the RTP and SCS. Section 3.17 of the Draft PEIR contains mitigation strategies that encourage local agencies to encourage alternative modes of travel and public transportation and to consider these in their land use approvals.

Comment Letter (Email) #16

FROM: Blaine Graybill at blainegrays@aol.com

DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with the California Air Resources Board (CARB).

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

With traffic expected to increase in the future given the population and employment forecasts, Madera County, the cities, and Caltrans are considering a variety of options to accommodate future travel, including roadway widening. However, many of the roadway projects proposed in the currently rural parts of the County (Rio Mesa area) would be funded through developer contributions and/or traffic impact fees through Madera County's Traffic Impact Fee Program. These projects would be designed to provide mobility for recreational travel, as well as travel to/from the foothills, Fresno, Madera Ranchos, City of Madera, and the Southeast Madera County New Growth Area developments.

Public transportation is currently provided in many areas of Madera County. In addition, there are transportation improvements included in the proposed 2014 RTP and SCS including proposed transit improvements that would encourage optimized use of public transportation, and enhanced transit programs with new routes that would operate at higher speeds. Growth patterns that promote alternatives to the automobile by creating mixed-use developments, which would include residences, shops, parks, and civic institutions, linked to pedestrian and-bicycle friendly public transportation centers, are also discussed in the RTP and SCS. Section 3.17 of the Draft PEIR contains mitigation strategies that encourage local agencies to encourage alternative modes of travel and public transportation and to consider these in their land use approvals.

Comment Letter (Email) #17

FROM: Don Manro at tulerue@gmail.com

DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the Regional Transportation Planning Agency (RTPA) is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Comment Letter (Email) #18

FROM: Paul O'Bara at yo_wutzup@yahoo.com

DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Public transportation is currently provided in many areas of Madera County. In addition, there are transportation improvements included in the proposed 2014 RTP and SCS including proposed transit improvements that would encourage optimized use of public transportation, and enhanced transit programs with new routes that would operate at higher speeds. Growth patterns that promote alternatives to the automobile by creating mixed-use developments, which would include residences, shops, parks, and civic institutions, linked to pedestrian and-bicycle friendly public transportation centers, are also discussed in the RTP and SCS. Section 3.17 of the Draft PEIR contains mitigation strategies that encourage local agencies to encourage alternative modes of travel and public transportation and to consider these in their land use approvals.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Comment Letter #19

FROM: Ron Martin at martinrj93638@yahoo.com

DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Comment Letter (Email) #20

FROM: Ruth Afifi at ruth37@gmail.com

DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Comment Letter (Email) #21

FROM: Tressa Prael at taiharurutressa@gmail.com

DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

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required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Comment Letter (Email) #22

FROM: Unsigned at anaandjoe@comcast.net

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

It should be noted that many of the developments proposed in the Rio Mesa area include both residential and non-residential land uses. Retail shopping centers as well as employment generating land uses are currently proposed. Therefore, a significant amount of tax revenues are expected to remain in Madera County.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

While traffic is expected to increase along SR-41 through Madera County whether or not Rio Mesa developments are constructed, Caltrans is considering options for increasing capacity along SR-41 in the future. Potential options include widening of the existing SR-41 as well as alternative freeway alignments to be funded through developer contributions and/or traffic impact fees through Madera County's Traffic Impact Fee Program. These SR-41 improvements would be designed to provide mobility for recreational travel, as well as travel to/from the foothills, Fresno, Madera Ranchos, City of Madera, and the Southeast Madera County New Growth Area developments.

Comment Letter (Email) #23

FROM: Andreas Markle at cougarncouzinx@sbcglobal.net

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

It should be noted that many of the developments proposed in the Rio Mesa area include both residential and non-residential land uses. Retail shopping centers as well as employment generating land uses are currently proposed. Therefore, a significant amount of tax revenues are expected to remain in Madera County.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Section 3.3 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to agricultural resources. A mitigation strategy identified on Page 3-33 states, "As part of the RTP and SCS formulation process; following approval of the 2014 RTP and SCS, the MCTC Policy Board will discuss directing MCTC staff to form a subcommittee to analyze, discuss and provide recommendations on possible policies aimed at the preservation of agricultural, natural and working lands; sustainable planning and infrastructure programs; and needs assessment activities, for inclusion into the transportation planning process at MCTC."

Comment Letter (Email) #24

FROM: Carla J. Neal
DATED: Not dated, received via email dated June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future

population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

It should be noted that many of the developments proposed in the Rio Mesa area include both residential and non-residential land uses. Retail shopping centers as well as employment generating land uses are currently proposed. Therefore, a significant amount of tax revenues are expected to remain in Madera County.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. Potential health risks associated with each type of air contaminant have been identified and mitigation strategies recommended. Tables 3-33 through 3-38 of the Draft PEIR show the estimated emissions for the diesel operated vehicles that travel along SR 41, SR 145, and SR 152. For purposes of this analysis, a half-mile segment of each freeway was evaluated for health risk impacts to sensitive receptors located 500 feet from the freeway segment. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the projects passed for all conformity tests.

Public transportation is currently provided in many areas of Madera County. In addition, there are transportation improvements included in the proposed 2014 RTP and SCS including proposed transit improvements that would encourage optimized use of public transportation, and enhanced transit programs with new routes that would operate at higher speeds. Growth patterns that promote alternatives to the automobile by creating mixed-use developments, which would include residences, shops, parks, and civic institutions, linked to pedestrian- and bicycle-friendly public transportation centers, are also discussed in the RTP and SCS. Section 3.17 of the Draft PEIR contains mitigation strategies that encourage local agencies to encourage alternative modes of travel and public transportation and to consider these in their land use approvals.

Section 3.8 of the Draft PEIR identifies impacts and appropriate mitigation measures related to energy and energy conservation. Although energy consumption would increase under the proposed 2014 RTP and SCS, the transportation improvements are designed to improve energy efficiency of the regional transportation system by increasing use of more fuel-efficient public transit, carpools, and vanpools, and improving circulation system levels of service.

As it relates to future growth areas, specifics such as employment, utilities, public services, and circulation would be determined at the time of each project submittal and approval process. The appropriate agency would require each project to meet all current standards, codes, and regulations. The 2014 RTP and SCS is not a project-specific document, but rather considers development for the County as a whole.

Comment Letter (Email) #25

FROM: Carla J. Neal
DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The project prioritization process is one of several processes utilized to determine placement and timing of capacity increasing projects for funding allocation. There are many aspects considered by MCTC as it develops the planned list of improvement projects submitted to MCTC by local agencies during development of the RTP and SCS. The evaluation criteria applied for purposes of this RTP and SCS was reviewed and commented on by the Roundtable and amended by MCTC staff and its consultant as they applied the criteria and prioritized the projects. Once the projects were prioritized, MCTC staff reviewed the available funding streams and the eligibility requirements for such funding on a project by project basis. This results in the most appropriate allocation of scarce federal and state funding to projects. Response to Comment #43C, D, and E provide additional detail and results of this allocation process. Mitigation measures are not deferred as a result of the project prioritization process established to prioritize RTP and SCS improvement projects.

Project prioritization or evaluation criteria was prepared for each mode of transportation. It is not possible to evaluate a bike and pedestrian project against a State Highway capacity increasing project. All other projects, besides the capacity increasing projects, will be funded as the local agencies apply for various funding program revenues through the Federal Transit Administration (FTA), CMAQ competitive application process, through the SCS Funding Program, or through the use of local funds.

Referencing the mitigation measures listed in Chapter 3, Section 3.17, MCTC has identified measures that should be considered by local jurisdictions as they allocate local funding to transportation projects.

It is appropriate for MCTC to identify mitigation measures that local agencies can reference and potentially implement to further the objectives of GHG reductions. The mitigation measures are not at odds with the evaluation criteria but support the evaluation criteria developed for other modes as noted above.

Project prioritization or evaluation criteria for all other modes were also presented to the Roundtable. All other modal projects (bike, pedestrian, and transit projects) submitted by the local agencies were reflected in the lists of

projects by mode that are planned and will be funded over the life of the RTP and SCS. Each of the other lists of modal projects are contained in Chapter 5 of the RTP and SCS. As noted above, the funding is either local, allocated in accordance with FTA requirements, allocated through the CMAQ competitive application process, allocated through the SCS Funding Program, or will be funded through other programs.

It should also be noted that MCTC developed both SCS performance criteria and project prioritization or evaluation criteria. The SCS alternative scenarios were evaluated considering the SCS performance criteria and the individual improvement projects were evaluated utilizing the project prioritization or evaluation criteria. Through the SCS alternative scenario evaluation process, MCTC did apply such criteria. Referencing Table 6-6 in Chapter 6 of the RTP and SCS, MCTC applied similar criteria, as well as others, to each SCS alternative scenario to determine transportation system performance.

Comment Letter (Email) #26

FROM: Diane Merrill at diane.b.merrill@comcast.net

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Public transportation is currently provided in many areas of Madera County. In addition, there are transportation improvements included in the proposed 2014 RTP and SCS including proposed transit improvements that would encourage optimized use of public transportation, and enhanced transit programs with new routes that would operate at higher speeds. Growth patterns that promote alternatives to the automobile by creating mixed-use developments, which would include residences, shops, parks, and civic institutions, linked to pedestrian- and bicycle-friendly public transportation centers, are also discussed in the RTP and SCS. Section 3.17 of the Draft PEIR contains mitigation strategies that encourage local agencies to encourage alternative modes of travel and public transportation and to consider these in their land use approvals.

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It should be noted that many of the developments proposed in the Rio Mesa area include both residential and non-residential land uses. Retail shopping centers as well as employment generating land uses are currently proposed. Therefore, a significant amount of tax revenues are expected to remain in Madera County.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Comment Letter (Email) #27

FROM: Dr. Elizabeth Leone at leonecisne@comcast.net

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

1. The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission

targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

2. Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with the California Air Resources Board (CARB).
3. The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

4. Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific

impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

5. See response to #3 above.
6. Referencing RTP and SCS Chapter 6, Table 6-6 on Page 6-18, the preferred scenario would yield 75.4 percent single family households and 24.6 percent multiple-family households. This percentage of multiple-family housing would be **a doubling** of the expected multi-family percentage of future households under the Status Quo Scenario or 12.9 percent. This 91 percent increase in density from the current trend or Status Quo Scenario is a **very significant increase** in density for Madera County. In fact, the City of Madera's General Plan has one of the highest planned density factors in the Valley. The City is considered a leader in the provision of planned higher density residential development. The City of Madera's planned densities are reflected in the Hybrid Scenario and therefore the RTP and SCS. Higher densities are also planned for the Southeast Madera County New Growth Area consistent with approved development plans and the Madera County General Plan. As noted in the RTP and SCS, higher densities across the remainder of the County are assumed in the Hybrid Scenario.

Finally, the Madera County Regional Housing Needs Allocation (RHNA) Plan is being prepared and reflects housing goals set by the State Department of Housing and Community Development (HCD). HCD has determined that Madera County must plan for at least 12,895 housing units between January 1, 2014 and December 31, 2023. Of the 12,895 housing units required in Madera County by December 31, 2023, 3,040 must be very low-income housing units, 2,155 must be low-income housing unit, 2,314 must be moderate-income housing units, and 5,406 must be above-moderate income housing units.

The land use modeling completed for all scenarios, including the preferred Hybrid Scenario, did consider the various types of housing and employment, transportation facilities and services available to support planned land uses, the spatial shift of housing, and the inventory of land planned for development. The Hybrid Scenario also considered jobs/housing balance objectives in its development and allocation of land uses.

7. There are currently **no indications** from funding agencies **that MCTC will not** be eligible for various funding sources because it adopts an RTP and SCS that

does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #28

FROM: Joe R. Correa at joercorrea@comcast.net

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Tables 2-3 and 2-4 of the Draft PEIR identify various projects along SR-145, Avenue 9, Avenue 12, as well as many other roadways within Madera County that will increase capacity, rehabilitate, or improve safety. These projects are financially-constrained and considered fully funded. These projects will help improve traffic flows and levels of service along these roadways. Any proposed developments (including rock quarries) will be required by the applicable agency to analyze potential impacts and provide appropriate mitigation measures. These may include but are not limited to contributing to the Madera County Traffic Impact Fee Program, constructing roadway improvements, and providing funding to needed improvements.

Comment Letter (Email) #29

FROM: Lloyd Carter at lcarter0i@comcast.net

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

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For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Comment Letter (Email) #30

FROM: Unsigned, Received in conjunction with the letter from Lloyd Carter at lcarter0i@comcast.net

DATED: Not dated, Received via email package June 26, 2014

RESPONSE #A Thank you for your comments.

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Comment Letter (Email) #31

FROM: Joe Correa at joercorrea@comcast.net

DATED: June 26, 2014

RESPONSE #A Duplicate of Comment Letter #28 above.

Comment Letter (Email) #32

FROM: Cathleen Wilson

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

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There are currently ***no indications*** from funding agencies ***that MCTC will not*** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #33

FROM: JD Williams
DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

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There are currently ***no indications*** from funding agencies ***that MCTC will not*** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #34

FROM: ???
DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

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MCTC did consider the results of the on-line survey or web-based tool results as it developed the RTP and SCS. There were a number of strategies incorporated into the RTP and SCS including the following:

- ✓ Focusing growth in existing and emerging centers and along major transportation corridors
- ✓ Creating areas of dense and mixed-use development and walkable communities
- ✓ Higher densities within the City of Madera and the Southeast Madera County Growth Area resulting in a 91 percent increase in density by new growth compared to the Status Quo Scenario or “business as usual”
- ✓ Preserving existing agricultural and open spaces throughout Madera County
- ✓ Funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent as compared to the 2011 RTP funding allocation by mode
- ✓ Enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera.
- ✓ Earmarked funding for SCS Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips
- ✓ Infill development to use land already planned for growth and development in the inner core areas of the cities
- ✓ Additional service, retail, and industrial development in Madera County consistent with adopted general plans, which results in reduced trips and VMT for trips that currently travel to Fresno or Merced for such services or jobs

- ✓ Increased bike and pedestrian facility funding to enhance walkability and reduce trip making

There are currently ***no indications*** from funding agencies ***that MCTC will not*** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #35

FROM: Shayne Seed
DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

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- ✓ Creating areas of dense and mixed-use development and walkable communities
- ✓ Higher densities within the City of Madera and the Southeast Madera County Growth Area resulting in a 91 percent increase in density by new growth compared to the Status Quo Scenario or “business as usual”
- ✓ Preserving existing agricultural and open spaces throughout Madera County
- ✓ Funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent as compared to the 2011 RTP funding allocation by mode
- ✓ Enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera.
- ✓ Earmarked funding for SCS Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips
- ✓ Infill development to use land already planned for growth and development in the inner core areas of the cities

- ✓ Additional service, retail, and industrial development in Madera County consistent with adopted general plans, which results in reduced trips and VMT for trips that currently travel to Fresno or Merced for such services or jobs
- ✓ Increased bike and pedestrian facility funding to enhance walkability and reduce trip making

Comment Letter (Email) #36

FROM: I. Casey
DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with CARB.

MCTC did consider the results of the on-line survey or web-based tool results as it developed the RTP and SCS. There were a number of strategies incorporated into the RTP and SCS including the following:

- ✓ Focusing growth in existing and emerging centers and along major transportation corridors
- ✓ Creating areas of dense and mixed-use development and walkable communities
- ✓ Higher densities within the City of Madera and the Southeast Madera County Growth Area resulting in a 91 percent increase in density by new growth compared to the Status Quo Scenario or “business as usual”
- ✓ Preserving existing agricultural and open spaces throughout Madera County
- ✓ Funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent as compared to the 2011 RTP funding allocation by mode
- ✓ Enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera.
- ✓ Earmarked funding for SCS Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips
- ✓ Infill development to use land already planned for growth and development in the inner core areas of the cities

- ✓ Additional service, retail, and industrial development in Madera County consistent with adopted general plans, which results in reduced trips and VMT for trips that currently travel to Fresno or Merced for such services or jobs
- ✓ Increased bike and pedestrian facility funding to enhance walkability and reduce trip making

There are currently ***no indications*** from funding agencies ***that MCTC will not*** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #37

FROM:

DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

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required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with CARB.

There are currently ***no indications*** from funding agencies ***that MCTC will not*** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #38

FROM: Christi Y. Profer
DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with CARB.

There are currently ***no indications*** from funding agencies ***that MCTC will not*** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #39

FROM: Charles ???
DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with CARB.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Comment Letter (Email) #40

FROM: Carey Wilson
DATED: June 25, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with CARB.

Public transportation is currently provided in many areas of Madera County. In addition, there are transportation improvements included in the proposed 2014 RTP and SCS including proposed transit improvements that would encourage optimized use of public transportation, and enhanced transit programs with new routes that would operate at higher speeds. Growth patterns that promote alternatives to the automobile by creating mixed-use developments, which would include residences, shops, parks, and civic institutions, linked to pedestrian- and bicycle-friendly public transportation centers, are also discussed in the RTP and SCS. Section 3.17 of the Draft PEIR contains mitigation strategies that encourage local agencies to encourage alternative modes of travel and public transportation and to consider these in their land use approvals.

MCTC has planned for enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera. MCTC did create, with the assistance and coordination of the RTP and SCS Roundtable, the Hybrid Scenario, which does significantly increase transit funding (up 73% from the 2011 RTP), and funding for attractive and safe streets (the SCS Program). Planned transit enhancements associated with the RTP and SCS Hybrid Scenario recognize future connection to the planned Fresno BRT system along Blackstone Avenue in Fresno County.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future

population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Comment Letter (Email) #41

FROM: Robert Merrill geolbob@yahoo.com
DATED: June 25, 2014

Thank you for your comments.

RESPONSE #A

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with the California Air Resources Board (CARB).

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Comment Letter #42

FROM: data.nations@gmail.com
Gary Lasky, Sierra Club Tehipite Chapter, Fresno
Chris Acree, Executive Director - Revive the San Joaquin
Keith Bergthold, Executive Director - Fresno Metro Ministry
Cesar Campos, Coordinator - Central California Environmental Justice Network
Gavin Feiger, Senior Program Associate - Sierra Nevada Alliance
Socorro Gaeta, Community Organizer - Latinos United for Clean Air
Veronica Garibay, Co-Director - Leadership Council for Justice and Accountability
Lourdes Herrera, Director - Madera Coalition for Community Justice
Gary Lasky, Conservation Chair and Legal Chair - Sierra Club Tehipite Chapter
Rey Leon, Executive Director - San Joaquin Valley Latino Environmental Advancement Project
Marty Martinez, Northern California Policy Manager - Safe Routes to School National Partnership
Dan O'Connell, San Joaquin Valley Program Manager - American Farmland Trust
Lowell J. Young - as an individual - President, Yosemite Area Audubon Society

DATED: June 26, 2014

Thank you for your comments.

RESPONSE #A **Meet the SB 375 greenhouse reduction targets**

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS), MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB regarding the outcome of the SCS and is in the process of reviewing the traffic model. During development of the APS, MCTC will continue to work with CARB to identify strategies that will help meet the GHG targets. It should be noted that MCTC has coordinated with the local agencies to identify how they intend to reduce GHG emissions. In addition, the City of Madera is preparing a Climate Action Plan.

It should also be noted that MCTC, in consultation with the cities and the County, as well as the RTP and SCS Roundtable, has identified a number of strategies to

reduce GHG emissions during development of the 2014 RTP and SCS including the following:

- ✓ Focusing growth in existing and emerging centers and along major transportation corridors
- ✓ Creating areas of dense and mixed-use development and walkable communities
- ✓ Higher densities within the City of Madera and the Southeast Madera County Growth Area resulting in a 91 percent increase in density by new growth compared to the Status Quo Scenario or “business as usual”
- ✓ Preserving existing agricultural and open spaces throughout Madera County
- ✓ Funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent as compared to the 2011 RTP funding allocation by mode
- ✓ Enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera.
- ✓ Earmarked funding for SCS Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips
- ✓ Infill development to use land already planned for growth and development in the inner core areas of the cities
- ✓ Additional service, retail, and industrial development in Madera County consistent with adopted general plans, which results in reduced trips and VMT for trips that currently travel to Fresno or Merced for such services or jobs
- ✓ Increased bike and pedestrian facility funding to enhance walkability and reduce trip making

There are currently **no indications** from funding agencies **that MCTC will not** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS. Furthermore, many other counties in the state do not have two mid-size urban areas in different geographic areas of a county similar to Madera County.

In addition, Madera County is located relatively close to the largest urban area in the San Joaquin Valley or the Fresno-Clovis Metropolitan Area (FCMA). Both the cities of Madera and Chowchilla and the foothill communities of Oakhurst, Coarsegold and Ahwahnee do not have retail outlets to support community

needs, nor do they have jobs to support their residents. As a result, many retail and other service and employment trips are made to the FCMA on a daily basis; thereby contributing significantly to the VMT and vehicle trips that result in increased GHG emissions. The provision of jobs and retail and service establishments in Madera County, developed consistent with adopted general plans will reduce VMT and vehicle trips currently accessing Fresno County for such services.

State and federal agencies, nor the State legislature have indicated that transportation funding will be allocated to the best performing RTPs/SCSs in the state in terms of their ability to reduce GHG emissions. Based on information received from CARB below, CARB staff is not aware of any issues with receiving federal highway funding, for an MPO lacking an approved SCS, as long as FHWA accepts the RTP.

With respect to the Strategic Growth Council, in the most recent grant guidelines (2013 Prop 84 awards), Threshold Requirement #3 on page 3 states:

“Any proposal from a city or county must demonstrate how its work program supports the region’s goals and plans, aligns with or complements an approved or adopted Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and other existing local government plans and projects that would be affected by the proposal. A letter from the regional agency concurring with this explanation is required. (See *Appendix C, Application Checklist*)”

With respect to Cap and Trade funding, while eligibility requirements are not explicitly stated in the budget expenditure plan, it does state:

“\$130 million to support the implementation of sustainable communities strategies required by Chapter 728, Statutes of 2008 (SB 375), and to provide similar support to other areas with GHG reduction policies, but not subject to SB 375 requirements.”

With respect to Caltrans’ 2014 Active Transportation Program Guidelines:

“Pursuant to statute, the goals of the Active Transportation Program are to: Advance the active transportation efforts of regional agencies to achieve greenhouse gas reduction goals as established pursuant to Senate Bill 375 (Chapter 728, Statutes of 2008) and Senate Bill 391 (Chapter 585, Statutes of 2009).” (Page 1)

“A city, county, transportation commission, regional planning agency, MPO, school district, or transit district may prepare an active transportation plan.... An active transportation plan must include, but not be limited to, the following components or explain why the component is not applicable:

(part m) “A description of how the active transportation plan has been coordinated with neighboring jurisdictions, including school districts within the plan area, and is consistent with other local or regional transportation, air quality, or energy conservation plans, including, but not limited to, general plans and a Sustainable Community Strategy in a Regional Transportation Plan.” (Page 17)

MCTC plans to immediately work with its member agencies and other stakeholders through a task force or committee to identify the purpose and procedures related to the SCS Funding Program. MCTC agrees that this program will reduce GHG emissions and that review of the traffic model and development of the APS will verify this expected outcome:

Mitigation Measure 3.6.1 contained in the Draft PEIR, Chapter 3, Section 3.6, Climate Change and in Table 1.1 in Chapter 1 of the Draft PEIR, has been revised to reflect that MCTC shall immediately form the SCS Funding Program committee or task force to define the program and process for funding allocation. At a minimum, the task force or committee will identify SCS Funding Program project evaluation criteria necessary to evaluate the potential of transportation and other projects to:

- ✓ Reduce GHG and air emissions
- ✓ Reduce VMT
- ✓ Reduce vehicle trips
- ✓ Reduce vehicle hours of delay and idling
- ✓ Increase transit trips
- ✓ Increase walkability
- ✓ Increase bike trips
- ✓ Support alternative modes or active transportation programs and services
- ✓ Other criteria that enables the task force or committee to clearly identify reductions in GHG emissions locally or on a regional basis

The evaluation criteria and funding program process would likely be similar to the current Congestion Mitigation and Air Quality (CMAQ) Funding Program, which gives priority to projects that reduce non-attainment pollutants.

MCTC will initiate the SCS Funding Program once the MCTC Policy Board has approved the 2014 RTP and SCS. MCTC staff does not currently have formal authority to move forward with development of the SCS Funding Program until the Policy Board has taken action on the RTP and SCS.

MCTC works with the local agencies as they update their general plans; specifically utilizing the regional traffic model to provide input into the general plan alternatives analysis.

RESPONSE #B

Prioritize Investment in existing communities throughout Madera County – MCTC is authorized by federal law (23 U.S.C. Subsection 134, which establishes six core functions of a Metropolitan Planning Organization [MPO] such as MCTC):

1. Establish a setting – establish and manage a fair and impartial setting for effective regional decision-making
2. Evaluate alternatives – evaluate transportation alternatives, scaled to realistically available options
3. Maintain a Long-Range Transportation Plan (LRTP) – develop and update a fiscally constrained long-range transportation plan covering a planning horizon of at least twenty years
4. Develop a Transportation Improvement Program – develop a fiscally constrained program based on the long-range transportation plan and designed to serve the region’s goals
5. Protect air quality – transportation plans, programs, and projects must conform with the State Implementation Plan (SIP)
6. Involve the public – involve the general public and all the significantly affected sub-groups in the functions listed above

Each MPO is also required to operate consistent with provisions contained in its Joint Powers Agreement (JPA) with its member agencies (local agencies or the cities and the County). MCTC does not have a JPA with its member agencies. MCTC’s established role is to foster intergovernmental coordination, undertake comprehensive regional planning with an emphasis on transportation issues, provide a forum for citizen input into the planning process, and to provide technical services to its member agencies. In all of these activities, the Commission works to develop a consensus among its members with regards to multi-jurisdictional transportation issues.

To change MCTC’s responsibilities from that of planning and programming by consensus and to not infringe on the political traditions and powers of the individual governments would require that the member agencies form a Joint

Powers Authority (JPA) that would give the MCTC Board the authority to adopt certain policies related to the RTP and SCS. The current membership of the MCTC Board is as follows: three (3) County Board of Supervisors, two (2) City of Madera Councilmembers, and one (1) City of Chowchilla Councilmember.

It is the position of MCTC that the policies contained in the RTP and SCS are advisory to the extent that they are to be followed by MCTC to identify, prioritize, plan, and program candidate transportation improvement projects nominated by its local agencies, other regional agencies, and Caltrans to address state and federal planning and programming requirements.

In addition to its role as an MPO, MCTC also is responsible for administering Measure T funds as the Madera County Transportation Authority (MCTA). In this role, MCTA has limited authority related to how Measure T funds can be programmed and spent. The funds that MCTA can program are controlled by the Measure T Investment Plan (which was approved by the voters), as well as an adopted Measure T Strategic Plan. The Investment Plan lists specific projects to be programmed and funded using Regional Measure T funds. Depending on revenues received during the 20 year life of Measure T (which sunsets in FY 2026/2027), it is the intent of MCTC/MCTA to deliver the maximum number of listed projects approved by the voters. The planned Measure T extension beyond FY 2026/27 assumes that this limited authority would also continue.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

The RTP and SCS is consistent with the adopted general plans of the cities and the County of Madera. Each of the communities will experience growth and development between 2014 and 2040 considering market conditions, planned

land use development, the location of jobs, other amenities, and the provision of adequate and/or enhanced access via a multimodal transportation system. Increased VMT to new towns included in adopted general plans will not be at the expense of existing communities. The cities and the County plan for housing and employment development to address a demand and to ensure that the growth is logical, justified, and enhances the quality of life within the County. The Southeast Madera County New Growth Area will not only include the development of housing but other community amenities and services including shopping, office, light industrial development and public services. These amenities will result in localized trips vs. longer trips to existing communities (such as Fresno and Clovis) for services. For purposes of the 2014 RTP and SCS, the focus of future growth and development consistent with the general plans was also placed on in-fill and increased densities along major corridors.

MCTC does not agree that the RTP and SCS directs significant investment into new growth areas. There are several regional transportation improvements that have been identified along SR 41 that would provide enhanced mobility along the corridor for the Southeast Madera County New Growth Area; however, those same investments in SR 41 will address other mobility needs related to the Madera foothills area, recreational travel needs through Madera County, access to Fresno and Clovis from the existing rural subdivisions in the Madera and Bonadelle Ranchos areas, and even trips from the City of Madera and other communities throughout the County. The **scenarios did not prioritize** growth in the Southeast Madera County New Growth Area. The allocation of socioeconomic data was undertaken in coordination with the local jurisdictions considering their adopted general plans and approved land use developments throughout the County, as well as population and employment projections prepared by DOF and InfoUSA and allocated based upon historic growth rates within each of the communities and growth areas. A majority of the funding for transportation improvements in the Southeast Madera County New Growth Area will come from the County Traffic Impact Fee Program and developer contributions as specified in approved development agreements between new development and the County of Madera. Only approximately \$43.6 million or 13% of \$328.2 million in federal, state and Measure T funding has been identified for improvements along SR 41 and other regional arterials in the Southeast Madera County New Growth Area. Again, these improvements will benefit the Southeast Madera County New Growth area, but they will also benefit the transportation needs of communities located throughout the entire County as noted above.

Again, the investments in the Southeast Madera County New Growth Area will not drain the other urban and rural areas or communities in the County. The RTP and SCS has allocated growth and development to those areas as well, consistent with adopted general plans, based on available land for development, historical population and employment trends reflected in the State DOF population projections, and the employment projections developed from InfoUSA data and projections. MCTC, through the RTP and SCS process, did prioritize growth and development in all communities and all urban and rural areas consistent with adopted general plans.

MCTC staff and its consultant worked with the MCTC RTP and SCS Roundtable to develop scenarios for evaluation. The scenarios presented and unanimously approved for consideration by the Roundtable were the Status Quo, Low Change, and Hybrid Scenarios. The Roundtable was attended by local agency representative, various private individuals, and a number of stakeholders including the Sierra Club, and other agencies listed in this comment letter. There were never any formal requests made by members of the Roundtable to provide additional scenarios for evaluation, including the scenario suggested in this comment letter.

Delaying or eliminating the major investment in the Rio Mesa or Southeast Madera County New Growth Area and redirecting the funds to existing communities as a means of improving the RTP and SCS benefits is stated opinion and not supported by technical analysis. MCTC, upon review of its traffic model, will continue to coordinate with CARB regarding development of the APS to identify strategies that will meet GHG emission reduction targets. Strategies to be considered include potential changes in land use patterns, transportation improvements and investments, and other feasible and achievable strategies.

RESPONSE #C

Meet the housing market demand for more compact and affordable housing types

The comment regarding the San Joaquin Valley Blueprint implementation process study is noted. Referencing RTP and SCS Chapter 6, Table 6-6 on Page 6-18, the preferred scenario would yield 75.4 percent single family households and 24.6 percent multiple-family households. This percentage of multiple-family housing would be **a doubling** of the expected multi-family percentage of future households under the Status Quo Scenario or 12.9 percent. This 91 percent increase in density from the current trend or Status Quo Scenario is a **very significant increase** in density for Madera County. In fact, the City of Madera's General Plan has one of the highest planned density factors in the Valley. The

City is considered a leader in the provision of planned higher density residential development. The City of Madera's planned densities are reflected in the Hybrid Scenario and therefore the RTP and SCS. Higher densities are also planned for the Southeast Madera County New Growth Area consistent with approved development plans and the Madera County General Plan. As noted in the RTP and SCS, higher densities across the remainder of the County are assumed in the Hybrid Scenario.

Finally, the Madera County Regional Housing Needs Allocation (RHNA) Plan is being prepared and reflects housing goals set by the State Department of Housing and Community Development (HCD). HCD has determined that Madera County must plan for at least 12,895 housing units between January 1, 2014 and December 31, 2023. Of the 12,895 housing units required in Madera County by December 31, 2023, 3,040 must be very low-income housing units, 2,155 must be low-income housing unit, 2,314 must be moderate-income housing units, and 5,406 must be above-moderate income housing units.

The land use modeling completed for all scenarios, including the preferred Hybrid Scenario, did consider the various types of housing and employment, transportation facilities and services available to support planned land uses, the spatial shift of housing, and the inventory of land planned for development. The Hybrid Scenario also considered jobs/housing balance objectives in its development and allocation of land uses.

MCTC **will not** revise the RTP and SCS Hybrid Scenario. MCTC will continue to review the traffic model and work with CARB to develop the APS in accordance with SB 375. It should be noted that the Hybrid Scenario percentage of multi-family housing exceeds the percentage of higher density residential development referenced in the approved Blueprint scenario (Low Change) for Madera County, which reflected future high density housing as 20 percent of total future households. The approved Blueprint Scenario (Low Change) provides for much lower housing density and a lower percentage share of multiple-family housing than the RTP and SCS (Hybrid Scenario at 28 percent).

As noted above, MCTC will form an SCS Funding Program task force or committee to begin the process of identifying the purpose and funding program process. Finally, MCTC will develop appropriate alternative scenario development metrics in consultation with the 2018 RTP and SCS Roundtable.

RESPONSE #D **Invest more in creating more walkable and transit-oriented or transit-ready neighborhoods**

MCTC agrees that walkable and transit-oriented neighborhoods have many benefits. MCTC has prepared the 2014 RTP and SCS with an emphasis on creating such neighborhoods. Compared to the 2011 RTP, funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent. As an example, MCTC has earmarked funding to SCS projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips. It is expected that once the traffic model is reviewed, that MCTC will be closer to meeting the GHG emissions reduction targets established by CARB. Once the model review is complete, MCTC will continue to work with CARB to develop the APS consistent with SB 375.

Based upon the above response, MCTC has not prioritized automobile travel at the expense of transit or other multi-modal projects – in fact it has shifted available funding to other modes from streets and highways to develop the SCS. As referenced, under the Hybrid Scenario (RTP and SCS), the percentage of households within 1,000 feet of a transit stop is a large percentage of new growth that would be able to access transit within a relatively short walk distance.

As previously stated, the RTP and SCS does not allocate a significant amount of funding to facilitate growth in the Southeast Madera New Growth Area or in the Ranchos Area. The allocation of state and federal funding for transportation improvements (including transit, streets and highways, bicycle, pedestrian, etc.) has been allocated to those regional facilities across the County that provide for regional mobility. Other local improvements in those two growth areas would be paid for by new development either through traffic impact fees and/or as conditions of development approval.

As noted above, Madera County is decreasing the allocation of funding to street and highway projects and significantly increasing funding to other modes of transportation that reduce GHG and air emissions. MCTC believes that it is very difficult to compare Fresno and San Joaquin Counties to Madera County. Madera's population is considerably more rural, much smaller, and divided between the foothills and the Valley floor area. The other two counties (Fresno and San Joaquin) do not have similar demographics or geographic characteristics. They both have a very significant urban core with less population density found outside those primary urban core areas (the Fresno-Clovis Metropolitan Area or FCMA and the Stockton Metropolitan Area). The statement that the RTP and SCS

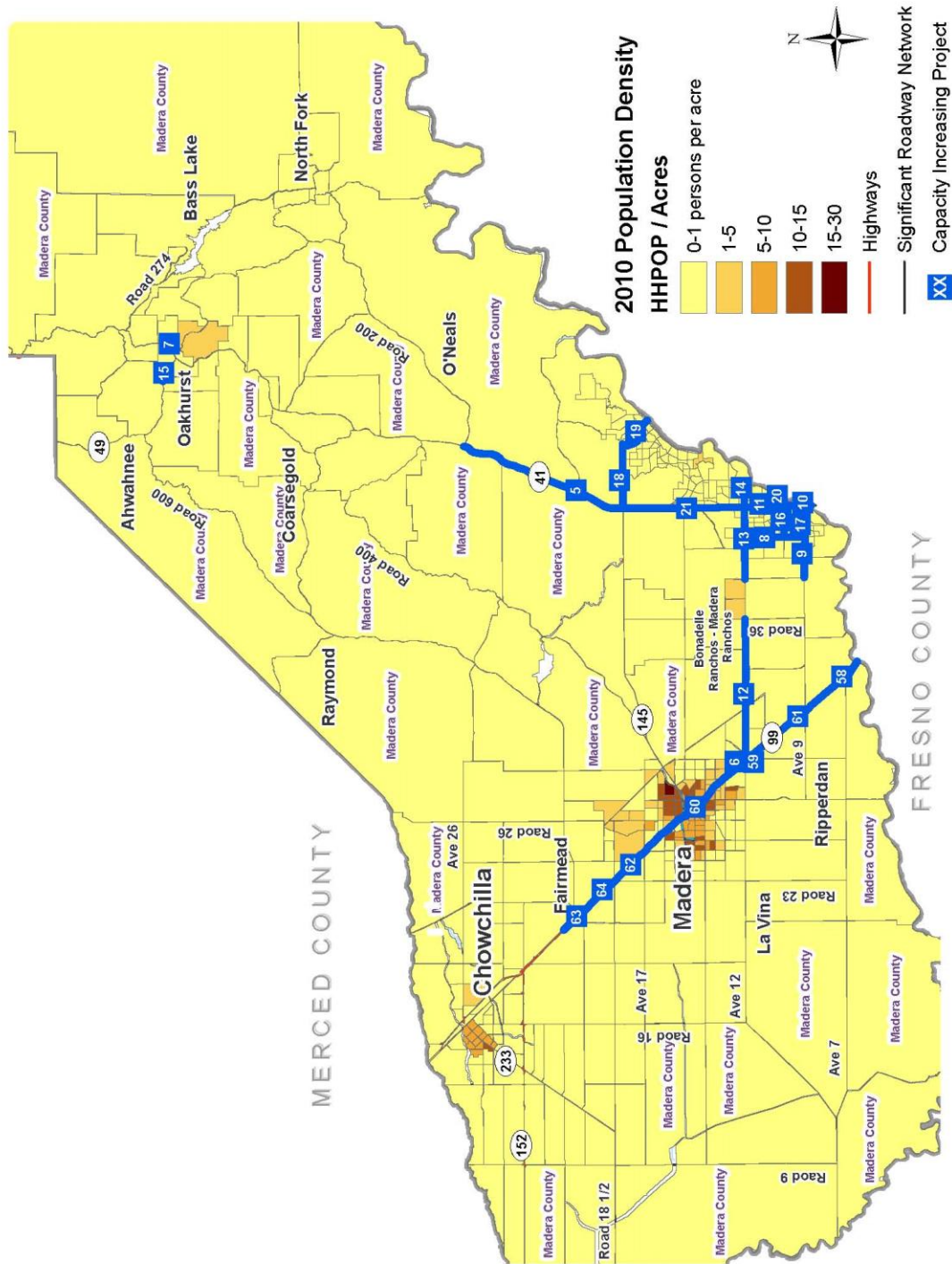
(Hybrid Scenario) has fewer transit, bicycle, and walking trips than the Status Quo Scenario is also not accurate. The RTP and SCS Hybrid Scenario results in decreased single occupant vehicle trips from the Status Quo Scenario or from 37.56 and 36.93 in the AM and PM peak periods under the Status Quo Scenario to 36.54 and 36.92 in the AM and PM peak hours. Percentage increases in multiple-occupant vehicles also occur as a result of the Hybrid Scenario as referenced in Table 6-6 of the RTP and SCS, the transit percentage decreases as noted in the comment letter, walk trips stay the same as the Status Quo Scenario, and bike trips increase with the Hybrid Scenario. It is likely that the transit ridership or trips decreased with the RTP and SCS Hybrid Scenario because jobs and housing was more compact enabling trips to be made by walking and biking.

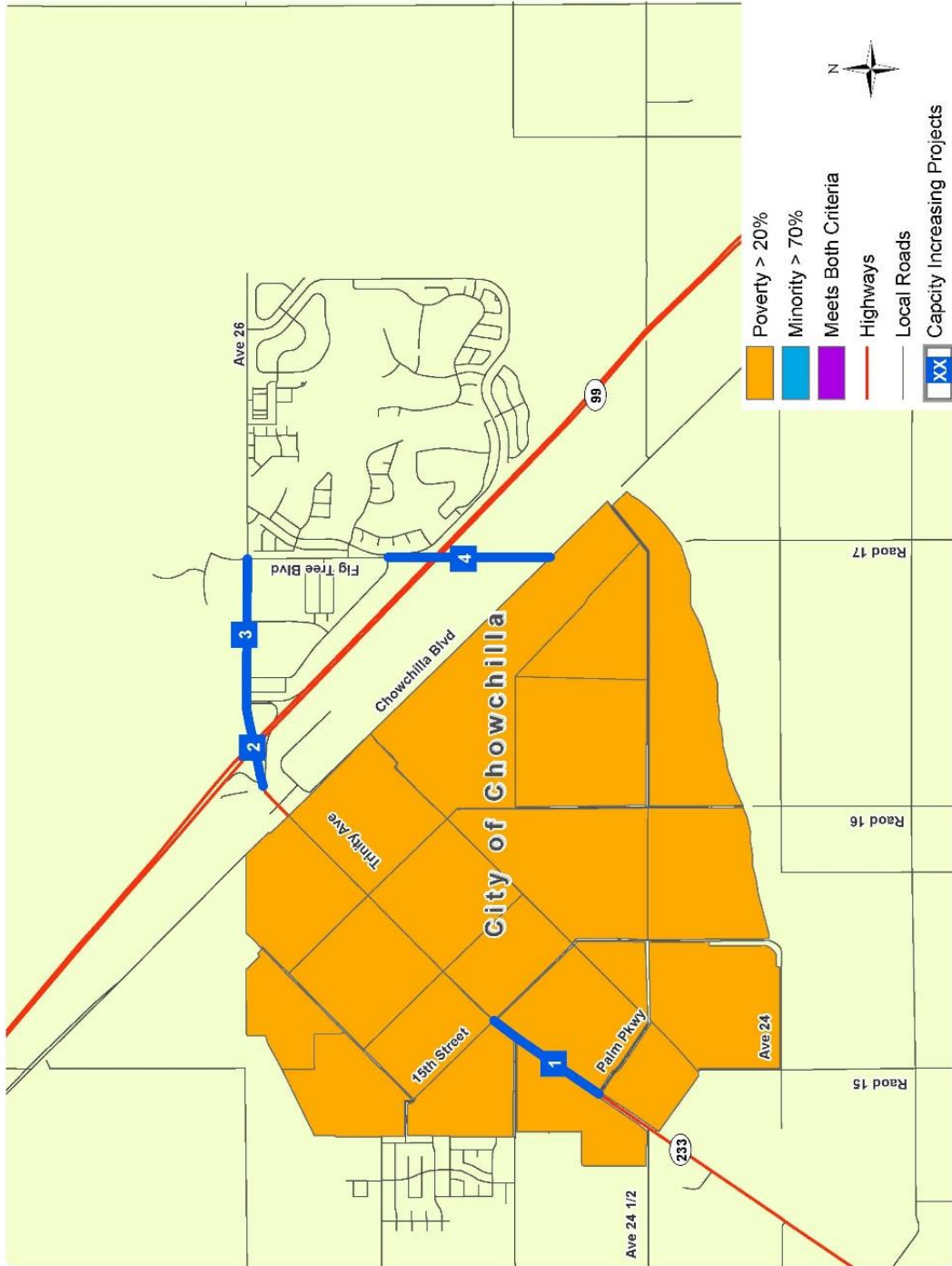
MCTC did create, with the assistance and coordination of the RTP and SCS Roundtable, the Hybrid Scenario, which does significantly increase transit funding (up 73% from the 2011 RTP), and funding for attractive and safe streets (the SCS Program). Planned transit enhancements associated with the RTP and SCS Hybrid Scenario recognize future connection to the planned Fresno BRT system along Blackstone Avenue in Fresno County. As previously noted, MCTC will move forward with development of the SCS Funding Program once the RTP and SCS is approved.

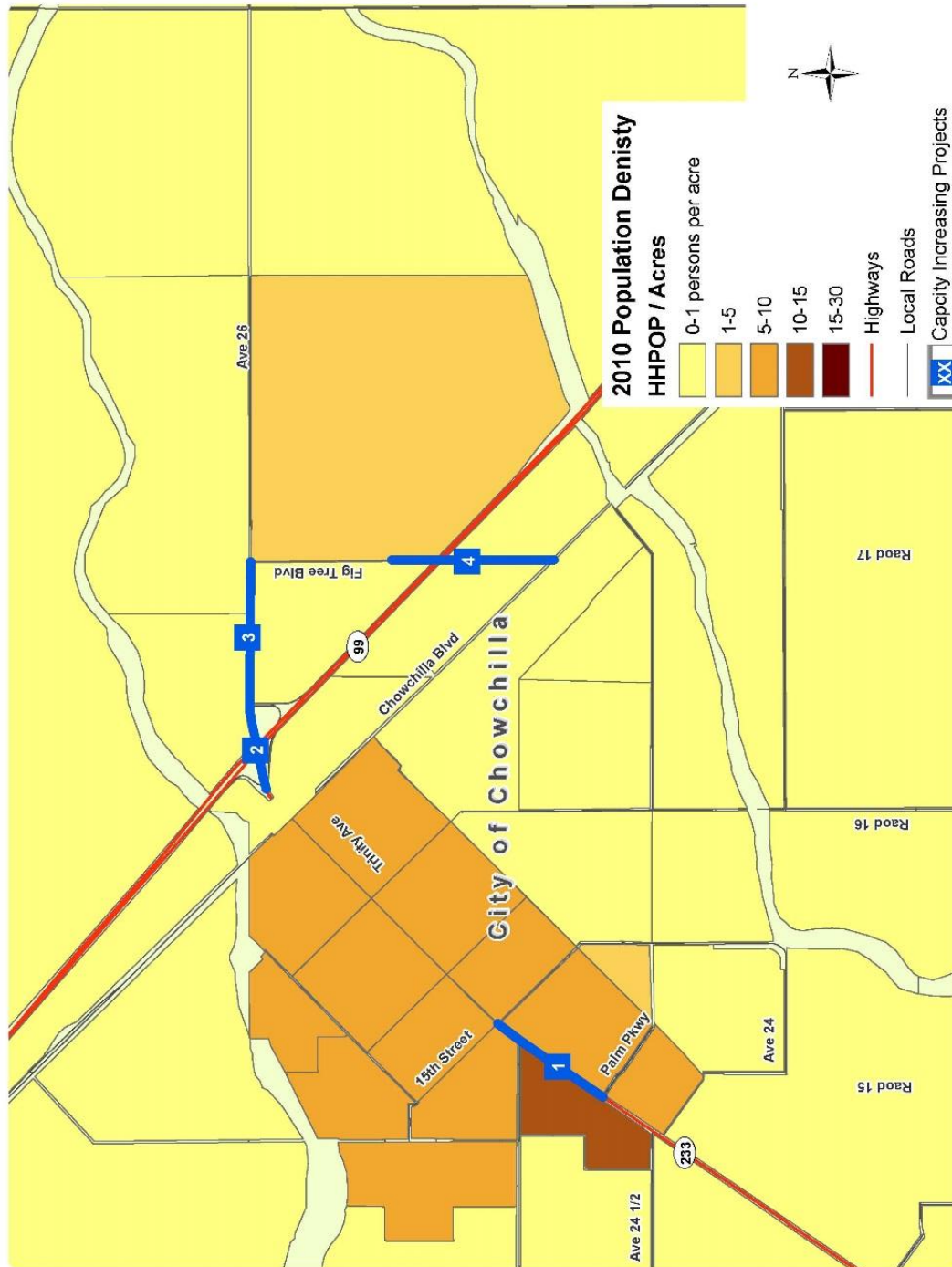
RESPONSE #E

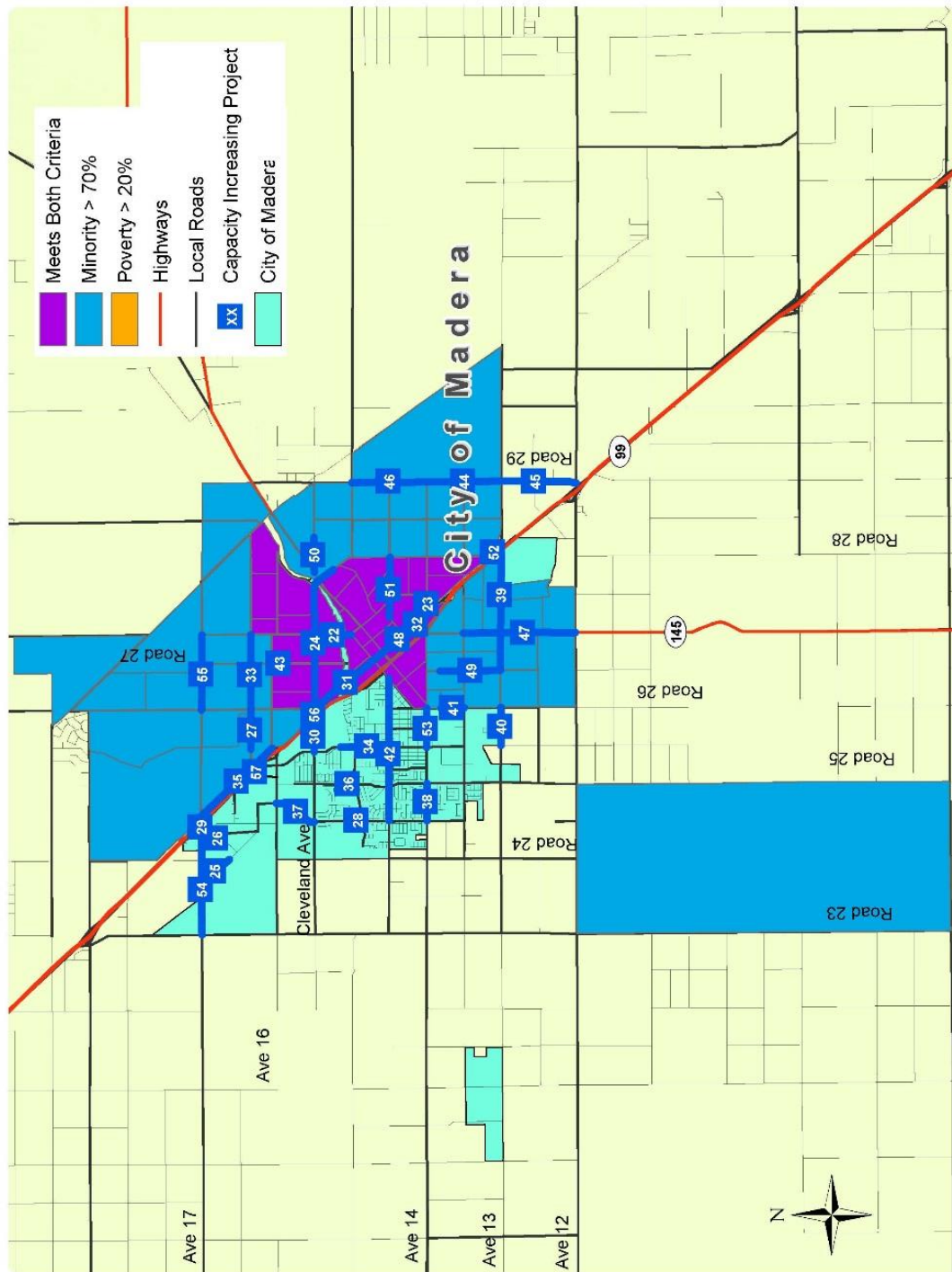
Meet the needs of disadvantaged communities and improve public health

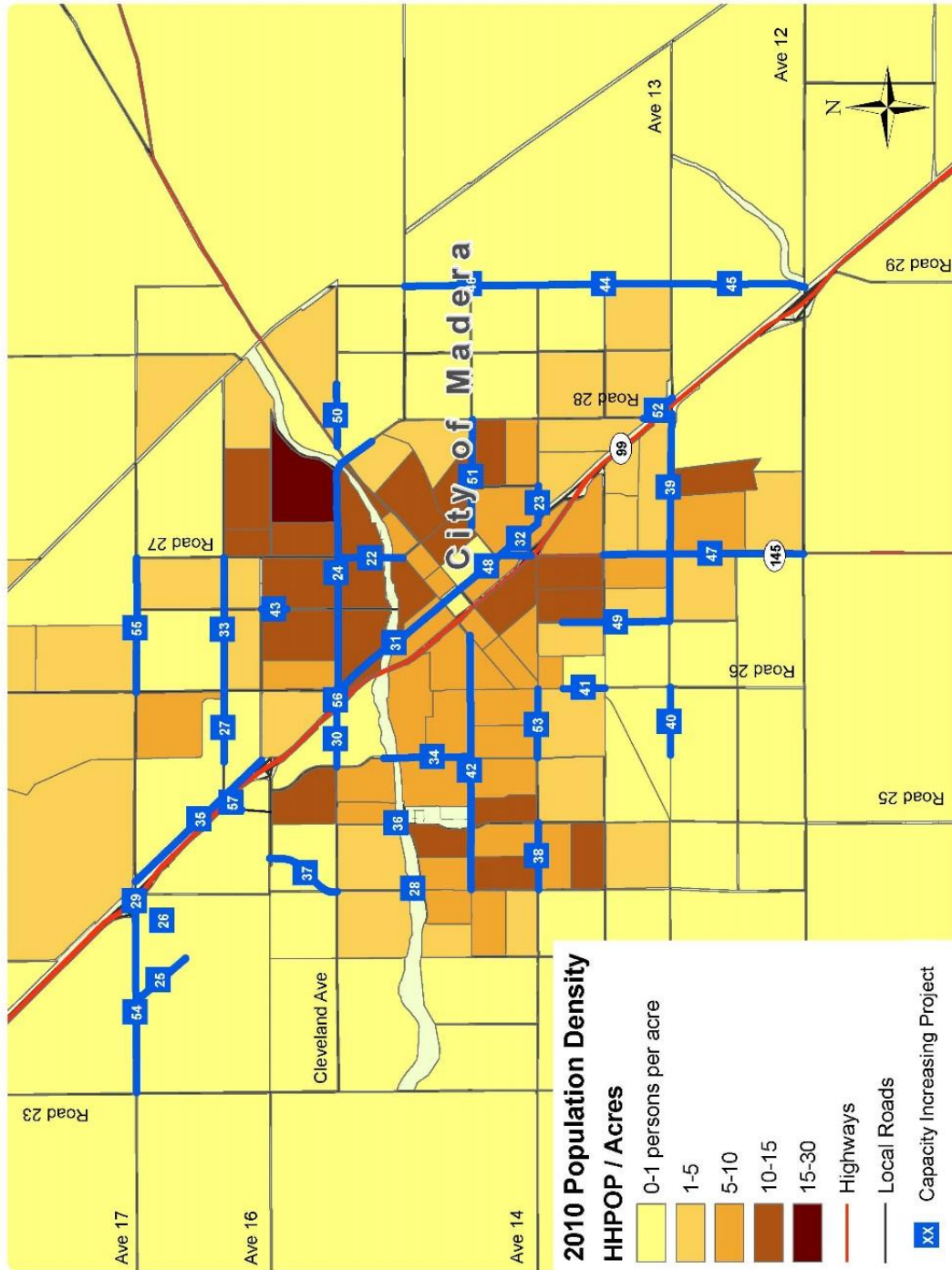
MCTC understands the issues surrounding environmental justice and has included a chapter in the RTP and SCS addressing environmental justice (EJ) needs and impacts of the plan on low income and minority communities. It should be noted, as it does in Chapter 2 of the Draft PEIR, that the California Environmental Quality Act (CEQA) does not require an assessment of social and economic impacts in the PEIR. The information provided in Chapter 3, Section 3.15 of the PEIR is only reflective of the overview of information contained in the 2014 RTP and SCS. MCTC has provided mapping in Chapter 10 of the Final Draft RTP and SCS, as well as on the following pages, which identify the proposed capacity increasing street and highway projects compared to low-income and minority populated areas within the County. The results of these maps continue to support the conclusion that the projects do not negatively impact the low-income or minority populated areas any greater than they do higher income and non-minority populated areas of the County. Furthermore, transportation improvement projects also benefit the low-income and minority populated areas of the County to the same extent as they do the higher-income and non-minority populated communities or areas of the County.











MCTC adheres to all directives regarding EJ and will work closely with regional partners/stakeholders to identify ways to improve our EJ analysis, as feasible and appropriate.

While many of the transportation projects identified in the Draft PEIR are located near minority and low-income communities and households, there are a significant number of projects that are expected to provide a benefit to these communities in the form of increased and improved transit services and other active transportation systems. It should also be noted that the RTP and SCS would provide a better mix of single and multi-family housing units, which would result in increased housing affordability and housing choice that would also benefit these communities.

The EJ analysis evaluates region-wide impacts on low-income and minority populations in Madera County. The RTP and SCS is intended to address all the communities in an equitable manner throughout the region. Project impacts are addressed in detail during subsequent project-level environmental review, based on more precise information regarding project specifications. MCTC will continue to evaluate and monitor EJ impacts at a regional scale.

The RTP and SCS increases congested VMT because the plan provides for higher and more compact development adjacent to transit lines, which also run along streets and highways throughout the County; especially within the City of Madera and along planned facilities within the Southeast Madera County New Growth and Ranchos Growth areas. A better comparison of trip reduction and reduced GHG and other emissions along corridors throughout the County would be total VMT, which is reduced with the Hybrid Scenario (5.2 million VMT) versus the Status Quo Scenario (5.3 million VMT). Finally, MCTC will develop appropriate scenario development metrics and performance measures in consultation with the 2018 RTP and SCS Roundtable.

RESPONSE #F

Protect the county's water quality, water supply, farmland, and natural resources

Referencing the RTP and SCS, Chapter. 6, Page 6-18, Table 6-6, MCTC does not agree that the Hybrid Scenario or RTP and SCS results in more acres of resource lands consumed vs the Status Quo in the Southeast Madera County New Growth Area. Referencing Footnotes 1 through 3, the reasons why the Status Quo Scenario consumed less resource lands is because the land use allocations in the Low Change and Hybrid Scenarios are affected by flood zone and resource lands

located in the ranchos growth area not the Southeast Madera County New Growth Area.

MCTC and Fresno COG have worked on river crossing studies in the past (Fresno-Madera East-West Corridor Studies – Phases 1 and 2) and other regional efforts. The two agencies continue to work on other studies as well including the following:

- ✓ Fresno-Madera East-West Corridor Study – Phase 1 and 2
- ✓ San Joaquin Valley Goods Movement Action Plan
- ✓ San Joaquin Valley Interregional Goods Movement Plan
- ✓ San Joaquin Valley Regional Blueprint
- ✓ San Joaquin Valley Intelligent Transportation System Strategic Plan
- ✓ Route 99 Corridor Business Plan
- ✓ Yosemite, Sequoia and Kings Canyon National Park Transit Market Assessment and Feasibility Study
- ✓ Fresno-Madera Origin Destination Study (proposed)

MCTC has identified mitigation measures in the Draft PEIR that should be addressed by local agencies as they certify project level EIRs and approve new land use developments. MCTC has prepared an SCS that is ambitious and achievable and therefore consistent with adopted land use policies of each of the local agencies.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation as part of project-level environmental review. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

Revision to Mitigation Measure 3.3.1 (related to formation of an agricultural mitigation subcommittee) is not necessary. Following approval of the RTP and SCS, MCTC will convene the subcommittee and it can decide if resource lands should also be considered. MCTC will convene the subcommittee as a means to facilitate discussion among the local agencies to identify appropriate mitigation of agricultural impacts associated with land use developments and implementation of transportation improvement projects. MCTC would welcome working with Fresno COG on the issue of agricultural and open space

preservation. Finally, MCTC has added the following objective to Chapter 4 of the RTP and SCS related to support for the conservation of farmland:

Protect and conserve existing agricultural land, provide broad community access to healthful foods, and promote the environmental and economic benefits of rural agricultural lands.

Comment Letter #43

FROM: data.nations@gmail.com, Craig K. Breon, Conservationist, Attorney at Law
DATED: June 26, 2014

RESPONSE #A: Thank you for your comments and the Sierra Club's participation in the RTP and SCS development process.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the Sustainable Communities Strategy (SCS) prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model and will be working with CARB to identify strategies that will help meet the GHG targets.

MCTC will not revise the RTP and SCS as currently developed and will recommend to its policy board that it certify the Final Program Environmental Impact Report (PEIR) and approve the Final Draft MCTC 2014 RTP and SCS.

RESPONSE #B MCTC provided details regarding the RTP and SCS assumptions to the Roundtable on several occasions. Assumptions were provided regarding demographics, land use model assumptions and parameters, and an overview of the traffic model. When the traffic model was run to estimate trips and VMT, the effect of gas pricing did not make a significant difference to the results. The methodology applied to address gas prices was applied consistent with other Councils of Governments (COGs) in the San Joaquin Valley, with the exception of Kern COG. It is understood that Kern COG applied a different set of assumptions regarding gas pricing. Utilization of Fuel Price assumptions are consistent with published fuel pricing policies established by the California Air Resources Board.

RESPONSE #C MCTC is authorized by federal law (23 U.S.C. Subsection 134, which establishes six core functions of a Metropolitan Planning Organization [MPO] such as MCTC):

1. Establish a setting – establish and manage a fair and impartial setting for effective regional decision-making
2. Evaluate alternatives – evaluate transportation alternatives, scaled to realistically available options

3. Maintain a Long-Range Transportation Plan (LRTP) – develop and update a fiscally constrained long-range transportation plan covering a planning horizon of at least twenty years
4. Develop a Transportation Improvement Program – develop a fiscally constrained program based on the long-range transportation plan and designed to serve the region’s goals
5. Protect air quality – transportation plans, programs, and projects must conform with the State Implementation Plan (SIP)
6. Involve the public – involve the general public and all the significantly affected sub-groups in the functions listed above

Each MPO is also required to operate consistent with provisions contained in its Joint Powers Agreement (JPA) with its member agencies (local agencies or the cities and the County). MCTC does not have a JPA with its member agencies. MCTC’s established role is to foster intergovernmental coordination, undertake comprehensive regional planning with an emphasis on transportation issues, provide a forum for citizen input into the planning process, and to provide technical services to its member agencies. In all of these activities, the Commission works to develop a consensus among its members with regards to multi-jurisdictional transportation issues.

To change MCTC’s responsibilities from that of planning and programming by consensus and to not infringe on the political traditions and powers of the individual governments would require that the member agencies form a Joint Powers Authority (JPA) that would give the MCTC Board the authority to adopt certain policies related to the RTP and SCS. The current membership of the MCTC Board is three (3) County Board of Supervisors, two (2) City of Madera Councilmembers, and one (1) City of Chowchilla Councilmember).

It is the position of MCTC that the policies contained in the RTP and SCS are advisory to the extent that they are to be followed by MCTC to identify, prioritize, plan, and program candidate transportation improvement projects nominated by its local agencies, other regional agencies, and Caltrans to address state and federal planning and programming requirements.

In addition to its role as an MPO, MCTC also is responsible for administering Measure T as the Madera County Transportation Authority (MCTC). In this role, MCTC has limited authority related to how Measure T funds can be programmed and spent. The funds that MCTC can program are controlled by the Measure T Investment Plan (which was approved by the voters), as well as an adopted Measure T Strategic Plan. The Investment Plan lists specific projects to be

programmed and funded using Regional Measure T funds. Depending on revenues received during the 20 year life of Measure T (which sunsets in FY 2026/2027), it is the intent of MCTC/MCTA to deliver the maximum number of listed projects approved by the voters. The planned Measure T extension beyond FY 2026/27 assumes that this limited authority would also continue.

Furthermore, a majority (73% or 30.3 million) of State Transportation Improvement Program (STIP) funds eligible to MCTC for programming capacity increasing street and highway projects have been programmed for major projects along SR 99 to match Proposition 1B funds to widen SR 99 and for the Avenue 12/SR 99 Interchange Improvement Project, which is already underway. The remainder of STIP funds have been allocated for passing lanes along SR 41 between SR 145 and Road 200 to provide for increased capacity and safety improvements for recreational travelers and residents/employees commuting from the foothill communities of Coarsegold, Oakhurst and Ahwahnee to the FCMA. Of the \$138.1 million to be available from Measure T funds, approximately, \$30.1 million (22%) have been allocated in the RTP and SCS to two projects in the Southeast Madera County New Growth Area or along SR 41 between the Avenue 10 and Avenue 12 and along Avenue 12 between Road 38 and SR 41. These projects will not only service the Southeast Growth Area, but also provide significant access to other residents, commuters and travelers, from throughout the County. It should be noted that a majority (\$169.5 million) of the funding planned for allocation to the Southeast Madera County New Growth Area for major street and highway projects is from “local” sources or from the collection of traffic impact fees or development contributions to address the impacts of new development. MCTC has no control over the programming of these local funds.

MCTC agrees that certain development projects exemptions and other streamlined permitting requirements are authorized under SB 375. Such eligibility guidance has not been issued. MCTC will review the guidance once released and work with the local agencies to identify eligible projects.

Finally, MCTC is not “kicking the can down the road” and deferring mitigation it has responsibility for to the local jurisdictions. Reference paragraph 1 above in Response to Comment #43C. MCTC/MCTA developed a significantly progressive Measure T funding program approved by the voters in Madera County. The funding program addresses all transportation modes, not just streets and highways.

RESPONSE #D

It is hoped that Measure T funds will be able to leverage additional state and federal funding for a variety of projects in Madera County; however, MCTC has not assumed such leveraged funding in the 2014 RTP and SCS. MCTC has only identified the availability of known funding sources and has assumed a conservative funding scenario.

Regarding MCTC/MCTA responsibilities, reference Response to Comment #43C above. Only \$138.1 million in Measure T funding has been planned for regional capacity increasing street and highway projects throughout Madera County. The remaining Measure T funding is planned for other modal projects and rehabilitation or safety projects along the regional and local street and highway system. It is true that MCTC/MCTA administer the Measure T program but its authority does not allow it to change the eligible list of projects obtained in the Investment Plan. Furthermore, MCTC/MCTA does have the option of managing the delivery of projects should a local agency or Caltrans not be able to provide such services or they are not delivering the projects in a timely manner. MCTC/MCTA, if it were to take on that responsibility, would not be able to deviate from the list of approved projects contained in the Investment Plan; it could only manage their delivery, just as the local agencies and Caltrans do now.

Reference paragraph 1 above under Response to Comment #41D regarding leveraging Measure T funding.

Only approximately 10.7 percent or \$50.2 million of the total project funding available for capacity increasing street and highway projects or \$486.7 million between 2014 and 2026/27 or within the timeframe of the current Measure T program. Under the extension program or beyond FY 2026/27, approximately \$85.9 million or 33.6 percent of total funding (\$256 million) will be from the future Measure T program.

RESPONSE #E

Please see Table 7-5 included in the Final RTP and SCS document. This table identifies the capacity increasing projects and funding stream. Reference Responses to Comments #43C and D for other clarifications requested.

The following table provides a review of the various funding sources and costs associated with the capacity increasing street and highway projects referenced in the 2014 RTP and SCS. Roughly 19% of the funds in the RTP and SCS are controlled by MCTC including 47% of the Measure T and Future Measure T funding (although changes to the existing Measure T Program would require approvals including voter approval), and 60% of the Congestion Mitigation and Air Quality (CMAQ) funding. The 60% CMAQ funding is set aside for a grant program. The RTP and

SCS proposes to use these funds for the new SCS Grant Funding Program. The remaining 40% of CMAQ funds are allocated to the local agencies based upon population. MCTC does receive TDA funds that are based on population following a public hearing process for Unmet Transit Needs. It should be noted that the funds go to transit first based on unmet needs that are reasonable to meet and then are available for streets and roads.

MCTC 2014 RTP and SCS Capacity Increasing Project Costs and Funding			
Thru 2026			
	Amount	%	Comments
Total Project Costs	\$308,606,603		
Measure T	\$46,073,000	14.93%	Changes require approvals and voter approval
Leveraged-State	\$33,870,000	10.98%	(not controlled by MCTC)
Leveraged-Prop 1B Bond	\$51,100,000	16.56%	(not controlled by MCTC)
Other Local/State Funds	\$177,563,603	57.54%	(not controlled by MCTC)
	\$308,606,603		
Thru 2040			
	Amount	%	Comments
Total Project Costs	\$742,710,687		
Measure T	\$138,098,620	18.59%	(Includes planning projections for Future Measure T after 2027; subject to change, contingent on passage of extension)
Leveraged-State	\$163,514,225	22.02%	(not controlled by MCTC)
Leveraged-Prop 1B Bond	\$51,100,000	6.88%	(not controlled by MCTC)
Other Local/State Funds	\$389,997,842	52.51%	(not controlled by MCTC)
	\$742,710,687		

Funding sources identified in RTP and SCS available for funding transportation improvements include the following:

- ✓ **State Transportation Improvement Program (STIP)** – The STIP is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the state Transportation Investment Fund and other funding sources. It is administered by the California Transportation Commission
- ✓ **Regional Surface Transportation Program (RSTP)** – The RSTP program is a federal program that provides funds to be used by local agencies on road projects. MCTC has no control over these funds

- ✓ **Measure T** – ½% sales tax in Madera County. Sunsets in 2027. MCTC has control over the Regional Program funds and Impounded Flexible funds. The majority of funds are a pass through to local agencies
- ✓ **Future Measure T** – Future sales tax for transportation. Assumed that MCTC will control a similar % of Regional Program funds as current Measure T
- ✓ **Congestion Management & Air Quality (CMAQ)** – CMAQ is a federal program that supports surface transportation projects and other related efforts that contribute air quality improvements and provide congestion relief. MCTC has some authority over these funds. The CMAQ Grant portion (60%) is proposed to be used for the new SCS Program
- ✓ **Section 5307** – Is a federal program that provides funding for transit capital and operating assistance in urbanized areas and for transportation related planning. Not controlled by MCTC
- ✓ **Section 5311** – Is a federal program that provides funding for public transit in non-urbanized areas with a population under 50,000. Not controlled by MCTC
- ✓ **Local Transportation Fund** – ¼% sales tax from state sales tax to be used for transit and non-transit related purposes that comply with regional transportation plans. (subject to transit needs assessment) Fiscally administered by MCTC; spent by local agencies
- ✓ **State Transit Assistance** – derived from state sales tax on diesel fuel to be used for transit purposes. Fiscally administered by MCTC; spent by local agencies
- ✓ **Impact Fees** – Fees collected by local agencies to use on transportation projects. Controlled by local agencies
- ✓ **Fare box Revenue** – Revenue generated from public transit services

Financial information and assumptions that were applied to allocate available funding included the following:

- ✓ **STIP Funds** – Committed to 41 Passing Lanes & SR 99 Corridor for duration of planned horizon (through 2040)

- ✓ **Measure T** – Regional portion has all been programmed for projects
- ✓ **Future Measure T** – Regional program, Local program, SCS Funding Program (Mix to be determined)
- ✓ **CMAQ** – Proposal to use Grant portion for SCS Funding Program

Finally, MCTC does receive RSTP funds that are exchanged for State funds. These funds are allocated to the agencies based upon population for improvement projects that the local agencies determine.

RESPONSE #F

Flexible funding is committed to regional projects and the opportunity does exist for the public to weigh in at the MCTC and MCTA board meetings. The Measure T flexible funds have been impounded by MCTC in place of adequate fair share of impact fees as dictated by the Measure T Investment Plan.

RESPONSE #G

Measure T does include an amendment policy and procedure (Administrative Code of the Madera County Transportation Authority – Ordinance No. 2006-01), which states the following:

103.1 Amendments to the Investment Plan. The Board may annually review and propose amendments to the Investment Plan to provide for the use of Federal, State, and local funds; to account for unexpected revenues; or to take into consideration unforeseen circumstances. The Investment Plan may be amended as follows:

- (a) Adoption of the proposed amendment may require the affirmative vote of two-thirds of the Commissioners following a noticed public hearing and a 45-day public comment period.
- (b) The proposed amendment adopted by the Board shall require the approval of the Board of Supervisors and the majority of the City Councils representing a majority of the population in the incorporated areas of the County.
- (c) If the Board of Supervisors and the majority of the City Councils representing a majority of the population in the incorporated areas of the County approve the proposed amendment, then the Authority shall request the Board of Supervisors to call for a special election and submit the matter to the Madera electorate, which shall require a two-thirds vote of the electorate to enact the amendment.

In order for MCTC to change the list of projects and funding programs contained in the Investment Plan the procedure noted above would need to be implemented and approved as noted.

RESPONSE #H The project prioritization process is one of several processes utilized to determine placement and timing of capacity increasing projects for funding allocation. There are many aspects considered by MCTC as it develops the planned list of improvement projects submitted to MCTC by local agencies during development of the RTP and SCS. The evaluation criteria applied or purposes of this RTP and SCS was reviewed and commented on by the Roundtable and amended by MCTC staff and its consultant as they applied the criteria and prioritized the projects. Once the projects were prioritized, MCTC staff reviewed the available funding streams and the eligibility requirements for such funding on a project by project basis. This results in the most appropriate allocation of scarce federal and state funding to projects. Responses to Comments #43C, D, and E provide additional detail and results of this allocation process. Mitigation measures are not deferred as a result of the project prioritization process established to prioritize RTP and SCS improvement projects.

RESPONSE #I The RTP and SCS does utilize a minimum level of service (LOS) policy of D. LOS D is also the minimum LOS policy established by each of the local jurisdictions. As a result, there are no conflicts with the regional or local LOS policy.

RESPONSE #J Project prioritization or evaluation criteria was prepared for each mode of transportation. It is not possible to evaluate a bike and pedestrian project against a State Highway capacity increasing project. All other projects, besides the capacity increasing projects, will be funded as the local agencies apply for various funding program revenues through the Federal Transit Administration (FTA), CMAQ competitive application process, through the SCS Funding Program, or through the use of local funds.

Referencing the mitigation measures listed in Chapter 3, Section 3.17, MCTC has identified measures that should be considered by local jurisdictions as they allocate local funding to transportation projects.

It is appropriate for MCTC to identify mitigation measures that local agencies can reference and potentially implement to further the objectives of GHG reductions. The mitigation measures are not at odds with the evaluation criteria but support the evaluation criteria developed for other modes as noted above.

Project prioritization or evaluation criteria for all other modes were also presented to the Roundtable. All other modal projects (bike, pedestrian, and transit projects) submitted by the local agencies were reflected in the lists of projects by mode that are planned and will be funded over the life of the RTP and SCS. Each of the other lists of modal projects are contained in Chapter 5 of the

RTP and SCS. As noted above, the funding is either local, allocated in accordance with FTA requirements, allocated through the CMAQ competitive application process, allocated through the SCS Funding Program, or will be funded through other programs.

RESPONSE #K Reference Response to Comment #43J.

RESPONSE #L MCTC developed both SCS performance criteria and project prioritization or evaluation criteria. The SCS alternative scenarios were evaluated considering the SCS performance criteria and the individual improvement projects were evaluated utilizing the project prioritization or evaluation criteria. The reference to the Victoria Transport Policy Institute excerpt relates to criteria applied to evaluate the performance of the transportation system as a whole. Through the SCS alternative scenario evaluation process, MCTC did apply such criteria. Referencing Table 6-6 in Chapter 6 of the RTP and SCS, MCTC applied similar criteria, as well as others, to each SCS alternative scenario to determine transportation system performance.

RESPONSE #M MCTC does not believe that additional mitigation measures are required or necessary to enhance the project prioritization evaluation criteria process or to enhance the SCS alternative scenario evaluation process. MCTC will work with the 2018 RTP and SCS Roundtable to review the criteria for both the project prioritization and evaluation process as well as the SCS alternative scenario evaluation process.

RESPONSE #N MCTC has amended the referenced mitigation measures to add the following additional language:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.

RESPONSE #O MCTC will continue to encourage local agencies to implement mitigation measures contained in the RTP and SCS PEIR as local agencies submit project-specific EIRs and other environmental documents for comment prior to certification and prior to design of specific improvement projects. MCTC will also continue to review environmental documents prepared for draft general, area, community and specific plans developed by local agencies and provide comments as appropriate. MCTC takes a good deal of time to prepare the PEIR mitigation

measures that local agencies can follow and reference to reduce impacts. Local agencies review these mitigation measures to ensure that they reduce such impacts to the greatest extent feasible.

The RTP and SCS also states: “The specific impacts regarding other changes to the existing environment will be evaluated as part of the implementation agencies’ project-level environmental review process regarding their proposed individual transportation improvement project(s) and future land use development(s). Implementation agencies will ultimately be responsible for ensuring adherence to the mitigation measures identified prior to construction.” In addition, the PEIR also states the following: “The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies.”

RESPONSE #P

MCTC has reviewed each mitigation measure contained in the PEIR and has revised a number of measures to strengthen the intent. The revised mitigation measures are listed in Chapter 2 of the Final PEIR. MCTC has identified mitigation measures that local agencies “must” consider or implement consistent with state and federal law such as to address air quality and other requirements. MCTC does not implement a vast majority of the measures, the local agencies do. MCTC has identified those mitigation measures that it can implement versus those that rely on local agencies to implement.

RESPONSE #Q

An estimate of resource land, developed for purposes of comparing the alternative SCS scenarios, was completed and reflected in Chapter 4 of the Draft PEIR. The table is also included in Chapter 6 of the RTP and SCS. The estimate of consumed resource lands has also been added to Chapter 3 of the PEIR, Section 3.3. Specifically, Impact 3.3.1 addresses impacts to natural lands. To provide an estimate of the amount of impact resulting from the RTP and SCS, the following paragraph has been added to the Draft PEIR and is reflected in Chapter 3 of this Final PEIR:

Specifically, the RTP and SCS will consume approximately 1,233 acres of natural resource lands resulting from new land use development. Transportation projects also have the potential to consume natural resource lands. While the exact amount of land consumed by transportation projects is unknown given the lack of specific data needed to quantify such impacts, approximately 182 lane miles of expanded roadway is expected to occur as a result of implementation of the RTP and SCS.

RESPONSE #R

The linear length in lane miles has been identified as a change to the Draft PEIR in Chapter 3 to this Final PEIR. The linear length in lane miles associated with new or expanded transportation improvements is 182 (lane miles added between 2010 and 2040). All project alternatives (except the No Project) have the same set of improvement projects. As a result, there are no differences in terms of impacts among the alternatives studied. The linear lane miles associated with the No Project alternative is 188 (lane miles added between 2000 and 2035). For purposes of the analysis, it is not possible to accurately reflect the amount of agricultural land or resource lands that would be impacted by new or expanding transportation improvement projects. There are a number of key factors that must be considered in order to make such a calculation including, but not limited to the following:

- ✓ Amount of Right-of-way (ROW already acquired by the affected local agency or Caltrans
- ✓ Amount of ROW impacting agricultural operations vs. vacant of any use
- ✓ How wide the expanded or new facility will be
- ✓ Whether traveler safety is an issue that would require wider lanes, shoulders or median treatments
- ✓ The need for truck acceleration and deceleration lanes
- ✓ Extent of intersection improvements
- ✓ Bike lane requirements, lane type and width
- ✓ Pedestrian and streetscape improvements
- ✓ Provision for parking and type of parking
- ✓ Need for bus turnouts
- ✓ Staging area requirements
- ✓ Location of utility easements and relocation
- ✓ Road alignment
- ✓ The need for roundabouts now required along Caltrans facilities where warranted – require more ROW
- ✓ The need for passing lanes
- ✓ The need for continuous left turn lanes
- ✓ Other turn lanes

- ✓ The extent of drainage facilities and culverts
- ✓ Bridge requirements and footprint
- ✓ Overcrossing and undercrossing requirements and footprint
- ✓ Other considerations

While other MPOs may have estimated the impact of new facilities on agricultural operations, the estimates are rough considering the above. The exact extent of agricultural land impact by type of farmland can only be known once design plans and environmental review of each individual transportation improvement project is complete. It is not possible at the regional scale of the MCTC 2014 RTP and SCS PEIR. As such, mitigation measures to be carried out by those agencies responsible for implementing RTP and SCS transportation improvement projects are included in the Draft PEIR and will reduce the severity of potential significant impacts if they are carried out in accordance with the measures noted. The extent to which the measures will be effective can only be determined as environmental documents are prepared for individual improvement projects.

RESPONSE #S

The Program EIR was prepared to reflect a regional analysis of impacts related to the proposed project, as appropriate. The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County (the two incorporated cities and the County of Madera), the Madera County Transportation Authority (MCTA), and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, working with federal, state, other regional agencies, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, the MCTA (consistent with the Measure T Investment and Strategic Plans), other regional agencies, and local agencies. MCTC has no authority to prepare final design services,

environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans, and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

No additional statements or agriculture resource-related mitigation measures will be added to the Draft PEIR. As the following existing Draft PEIR mitigation measure reflects (Mitigation Measure associated with Impacts 3.3.1 through 3.3.3 of the Draft PEIR), MCTC will work with appropriate stakeholders and other organizations, including the American Farmland Trust, as well as its member agencies (two cities and the County of Madera), to develop appropriate policies that will protect agricultural and other natural land resources potentially impacted by transportation projects throughout Madera County.

Impact and Mitigation Measures 3.3.1 through 3.3.3: *“As part of the RTP and SCS formulation process; following approval of the 2014 RTP and SCS, the MCTC Policy Board will discuss directing MCTC staff to form a subcommittee to analyze, discuss and provide recommendations on possible policies aimed at the preservation of agricultural, natural and working lands; sustainable planning and infrastructure programs; and needs assessment activities, for inclusion into the transportation planning process at MCTC. Working collaboratively with community-based organizations, interested stakeholders and professional staff, this committee would be on-going, and discuss the formulation of policy and program language to:*

- *Develop a methodology to help implementing agencies quantify the conversion of prime farmland, unique farmland, farmland of statewide importance, and farmland of local importance associated with their proposed projects.*
- *Develop a methodology for implementing agencies to consider preservation ratios to minimize loss of prime, unique, and statewide importance farmland; and coordinate efforts to provide a mechanism for preservation activities.”*

The cited examples of regional projects noted beginning on page 9 of your comment letter are not regional projects in the same sense as the RTP and SCS.

The projects listed are specific improvement projects not a list of general improvement projects listed in a general plan, RTP or other similar plan or study.

As noted above, MCTC has identified a mitigation measure that will bring the local agencies together to discuss development of a methodology to help quantify the conversion of agricultural lands and natural and working lands including a methodology for implementing agencies to consider preservation ratios to minimize impacts.

Finally, Chapter 5 of the Draft PIER addresses cumulative impacts associated with the RTP and SCS.

RESPONSE #T

MCTC does not have control over any of the funding identified in the RTP and SCS to the extent that it can require Caltrans or local jurisdictions to mitigate the growth inducing impacts of transportation projects that they implement. MCTC does request that local jurisdictions or other applicants apply for CMAQ funding when available. Applicants must apply for such funds by filing an application that identifies how their project will reduce non-attainment air emissions. The only other funding source available to the region other than other federal and state funding is Measure T funding. Issues associated with Measure T funding have been discussed previously – reference Responses to Comments #43C, D, and G above.

RESPONSE #U

There is no time between the end of the comment period for the Draft PEIR and the release of the Final PEIR and the Final RTP and SCS to convene a committee and develop a policy related to the mitigation of agricultural impacts. The Draft PEIR and Draft RTP and SCS comment period ended on June 26, 2014 and the Final PEIR and RTP and SCS must be provided to commenting persons and agencies by July 12, 2014 in accordance with CEQA. As stated in the mitigation measure, MCTC will convene the committee following approval of the RTP and SCS.

RESPONSE #V

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS), prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB regarding the outcome of the SCS and is in the process of reviewing the traffic model. During development of the APS, MCTC will continue to work with

CARB to identify strategies that will help meet the GHG targets. It should be noted that MCTC has coordinated with the local agencies to identify how they intend to reduce GHG emissions. In addition, the City of Madera is in the process of preparing a Climate Action Plan.

It should be noted that MCTC, in consultation with the cities and the County, as well as the RTP and SCS Roundtable, has identified a number of strategies to reduce GHG emissions during development of the 2014 RTP and SCS including the following:

- ✓ Focusing growth in existing and emerging centers and along major transportation corridors
- ✓ Creating areas of dense and mixed-use development and walkable communities
- ✓ Higher densities within the City of Madera and the Southeast Madera County Growth Area resulting in a 91 percent increase in density by new growth compared to the Status Quo Scenario or “business as usual”
- ✓ Preserving existing agricultural and open spaces throughout Madera County
- ✓ Funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent as compared to the 2011 RTP funding allocation by mode
- ✓ Enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera.
- ✓ Earmarked funding for SCS Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips
- ✓ Infill development to use land already planned for growth and development in the inner core areas of the cities
- ✓ Additional service, retail, and industrial development in Madera County consistent with adopted general plans, which results in reduced trips and VMT for trips that currently travel to Fresno or Merced for such services or jobs
- ✓ Increased bike and pedestrian facility funding to enhance walkability and reduce trip making

RESPONSE #W

Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is required to prepare an Alternative Planning Strategy (APS). MCTC has already been in contact with CARB regarding the outcome of the SCS and is in the process of reviewing the traffic model.

During development of the APS, MCTC will continue to work with CARB to identify strategies that will help meet the GHG targets. It should be noted that MCTC has coordinated with the local agencies to identify how they intend to reduce GHG emissions.

RESPONSE #X

A majority (73% or 30.3 million) of State Transportation Improvement Program (STIP) funds eligible to MCTC for programming capacity increasing street and highway projects have been programmed for major projects along SR 99 to match Proposition 1B funds to widen SR 99 and for the Avenue 12/SR 99 Interchange Improvement Project, which is already underway. The remainder of STIP funds have been allocated for passing lanes along SR 41 between SR 145 and Road 200 to provide for increased capacity and safety improvements for recreational travelers and residents/employees commuting from the foothill communities of Coarsegold, Oakhurst and Ahwahnee to the FCMA. Of the \$138.1 million to be available from Measure T funds, approximately, \$30.1 million (22%) have been allocated in the RTP and SCS to two projects in the Southeast Madera County New Growth Area or along SR 41 between Avenue 10 and Avenue 12 and along Avenue 12 between Road 38 and SR 41. These projects will not only service the Southeast Growth Area, but also provide significant access to other residents, commuters and travelers, from throughout the County. It should be noted that a majority (\$169.5 million) of the funding planned for allocation to the Southeast Madera County New Growth Area for major street and highway projects is from “local” sources or from the collection of traffic impact fees or development contributions to address the impacts of new development. MCTC has no control over the programming of these local funds.

MCTC and its member agencies are concerned about reducing GHG emissions, and have agreed to significantly revise the allocation of funding to all modes of transportation. Compared to the 2011 RTP, funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent. As an example, MCTC has earmarked funding to SCS projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips. It is expected that once the traffic model is reviewed, that MCTC will be closer to meeting the GHG emissions reduction targets established by CARB. Once the model review is complete, MCTC will continue to work with CARB to develop the APS consistent with SB 375.

MCTC staff and its consultant worked with the MCTC RTP and SCS Roundtable to develop scenarios for evaluation. The scenarios presented and unanimously approved for consideration by the Roundtable were the Status Quo, Low Change,

ad Hybrid Scenarios. The Roundtable was attended by local agency representative, various private individuals, and a number of stakeholders including the Sierra Club, and other agencies. There were never any formal requests made by members of the Roundtable to provide additional scenarios for evaluation, including the scenario suggested in this comment letter. Alternative scenarios developed as part of the RTP and SCS were developed in accordance with requirements set forth in SB 375 and considering the approved general plans of each of the local jurisdictions. It was important that the preferred SCS scenario be ambitious and achievable. The Hybrid Scenario is both because it includes the various strategies listed above and because it is consistent with adopted land use policy set forth by the local agencies.

RESPONSE #Y

The Program EIR was prepared to reflect a regional analysis of impacts related to the proposed project, as appropriate. The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County, other regional agencies, and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments.

Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, working with federal, state, other regional agencies, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, the MCTA (consistent with the Measure T Investment and Strategic Plans), other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies,

other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

RESPONSE #Z

MCTC plans to immediately work with its member agencies and other stakeholders through a task force or committee to identify the purpose and procedures related to the SCS Funding Program. MCTC agrees that this program will reduce GHG emissions and that review of the traffic model and development of the APS will verify this expected outcome:

Mitigation Measure 3.6.1 contained in the Draft PEIR, Chapter 3, Section 3.6, Climate Change and in Table 1.1 in Chapter 1 of the Draft PEIR, has been revised to reflect that MCTC shall immediately form the SCS Funding Program committee or task force to define the program and process for funding allocation. At a minimum, the task force or committee will identify SCS Funding Program project evaluation criteria necessary to evaluate the potential of transportation and other projects to:

- ✓ Reduce GHG and air emissions
- ✓ Reduce VMT
- ✓ Reduce vehicle trips
- ✓ Reduce vehicle hours of delay and idling
- ✓ Increase transit trips
- ✓ Increase walkability
- ✓ Increase bike trips
- ✓ Support alternative modes or active transportation programs and services
- ✓ Other criteria that enables the task force or committee to clearly identify reductions in GHG emissions locally or on a regional basis

The evaluation criteria and funding program process would likely be similar to the current Congestion Mitigation and Air Quality (CMAQ) Funding Program, which gives priority to projects that reduce non-attainment pollutants.

MCTC will initiate the SCS Funding Program once the MCTC Policy Board has approved the 2014 RTP and SCS. MCTC staff does not currently have formal authority to move forward with development of the SCS Funding Program until the Policy Board has taken action on the RTP and SCS.

RESPONSE #AA

MCTC will move forward with the workshop as noted in Mitigation Measure 3.6.1 referenced in the Draft PEIR, Chapter 3, Section 3.6.

RESPONSE #BB MCTC has coordinated with the local agencies to identify how they intend to reduce GHG emissions. In addition, the City of Madera is in the process of preparing a Climate Action Plan.

MCTC does not have control over any of the funding identified in the RTP and SCS to the extent that it can require Caltrans or local jurisdictions to mitigate the growth inducing impacts of transportation projects that they implement. MCTC does request that local jurisdictions or other applicants apply for CMAQ funding when available. Applicants must apply for such funds by filing an application that identifies how their project will reduce non-attainment air emissions. The only other funding source available to the region other than other federal and state funding is Measure T funding. Issues associated with Measure T funding have been discussed previously – reference Responses to Comments #43C, D, and G above.

RESPONSE #CC Reference Response to Comment #43BB above.

RESPONSE #DD The major change scenario reflected in the Blueprint was not considered because it placed a considerable burden for higher density development on the City of Chowchilla and all other unincorporated communities in the County. The higher densities associated with the Moderate Change Scenario from the Blueprint were considered when the RTP and SCS Hybrid Scenario was developed. The Hybrid Scenario tasks the higher density characteristics of the Moderate Change Blueprint scenario and the lower density characteristics associated with the Low Change Blueprint scenario and marries them with the low change densities affecting the unincorporated areas of the County and the City of Chowchilla and the higher densities of the Moderate Change Blueprint Scenario and applies them to the City of Madera and the Southeast Madera County New Growth Area.

Ultimately the Policy Board had to select a scenario that they found was ambitious and achievable. After reviewing the data, comments, workshop and on-line survey results, and additional information supplied by local agencies and MCTC staff's two year RTP process, the MCTC Policy Board found the Hybrid Scenario to be their best option.

RESPONSE #EE CEQA does not require the identification of social or economic impacts. Further, the general plans of the local agencies were considered during development of the RTP and SCS Hybrid and other alternative scenarios. The Hybrid Scenario was chosen because it would provide the highest GHG reductions and is ambitious and achievable. The commenter assumes that the Southeast Madera County

New Growth Area will not have a mix of employment types and housing types to increase jobs-housing balance and jobs-housing mix objectives. Various area and other plans already approved for the Growth Area contain planned higher density land uses, as well as planned industrial land uses. These planned land uses will result in meeting such objectives.

RESPONSE #FF

MCTC will not revise the RTP and SCS as currently developed and will recommend to its policy board that it certify the Final Program Environmental Impact Report (PEIR) and approve the Final Draft MCTC 2014 RTP and SCS.

Comment Letter #44

FROM: Craig K. Breon, Esq, Tehipite Chapter of the Sierra Club, P.O. Box 5396, Fresno, CA 93755
DATED: June 26, 2014

Thank you for your comments.

RESPONSE #A: Thank you for your comments and the Sierra Club's participation in the RTP and SCS development process.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the Sustainable Communities Strategy (SCS) prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model and will be working with CARB to identify strategies that will help meet the GHG targets.

MCTC will not revise the RTP and SCS as currently developed and will recommend to its policy board that it certify the Final Program Environmental Impact Report (PEIR) and approve the Final Draft MCTC 2014 RTP and SCS.

RESPONSE #B MCTC provided details regarding the RTP and SCS assumptions to the Roundtable on several occasions. Assumptions were provided regarding demographics, land use model assumptions and parameters, and an overview of the traffic model. When the traffic model was run to estimate trips and VMT, the effect of gas pricing did not make a significant difference to the results. The methodology applied to address gas prices was applied consistent with other Councils of Governments (COGs) in the San Joaquin Valley, with the exception of Kern COG. It is understood that Kern COG applied a different set of assumptions regarding gas pricing. Utilization of Fuel Price assumptions are consistent with published fuel pricing policies established by the California Air Resources Board.

RESPONSE #C MCTC is authorized by federal law (23 U.S.C. Subsection 134, which establishes six core functions of a Metropolitan Planning Organization [MPO] such as MCTC):

1. Establish a setting – establish and manage a fair and impartial setting for effective regional decision-making

2. Evaluate alternatives – evaluate transportation alternatives, scaled to realistically available options
3. Maintain a Long-Range Transportation Plan (LRTP) – develop and update a fiscally constrained long-range transportation plan covering a planning horizon of at least twenty years
4. Develop a Transportation Improvement Program – develop a fiscally constrained program based on the long-range transportation plan and designed to serve the region’s goals
5. Protect air quality – transportation plans, programs, and projects must conform with the State Implementation Plan (SIP)
6. Involve the public – involve the general public and all the significantly affected sub-groups in the functions listed above

Each MPO is also required to operate consistent with provisions contained in its Joint Powers Agreement (JPA) with its member agencies (local agencies or the cities and the County). MCTC does not have a JPA with its member agencies. MCTC’s established role is to foster intergovernmental coordination, undertake comprehensive regional planning with an emphasis on transportation issues, provide a forum for citizen input into the planning process, and to provide technical services to its member agencies. In all of these activities, the Commission works to develop a consensus among its members with regards to multi-jurisdictional transportation issues.

To change MCTC’s responsibilities from that of planning and programming by consensus and to not infringe on the political traditions and powers of the individual governments would require that the member agencies form a Joint Powers Authority (JPA) that would give the MCTC Board the authority to adopt certain policies related to the RTP and SCS. The current membership of the MCTC Board is three (3) County Board of Supervisors, two (2) City of Madera Councilmembers, and one (1) City of Chowchilla Councilmember).

It is the position of MCTC that the policies contained in the RTP and SCS are advisory to the extent that they are to be followed by MCTC to identify, prioritize, plan, and program candidate transportation improvement projects nominated by its local agencies, other regional agencies, and Caltrans to address state and federal planning and programming requirements.

In addition to its role as an MPO, MCTC also is responsible for administering Measure T as the Madera County Transportation Authority (MCTC). In this role, MCTC has limited authority related to how Measure T funds can be programmed and spent. The funds that MCTC can program are controlled by the Measure T

Investment Plan (which was approved by the voters), as well as an adopted Measure T Strategic Plan. The Investment Plan lists specific projects to be programmed and funded using Regional Measure T funds. Depending on revenues received during the 20 year life of Measure T (which sunsets in FY 2026/2027), it is the intent of MCTC/MCTA to deliver the maximum number of listed projects approved by the voters. The planned Measure T extension beyond FY 2026/27 assumes that this limited authority would also continue.

Furthermore, a majority (73% or 30.3 million) of State Transportation Improvement Program (STIP) funds eligible to MCTC for programming capacity increasing street and highway projects have been programmed for major projects along SR 99 to match Proposition 1B funds to widen SR 99 and for the Avenue 12/SR 99 Interchange Improvement Project, which is already underway. The remainder of STIP funds have been allocated for passing lanes along SR 41 between SR 145 and Road 200 to provide for increased capacity and safety improvements for recreational travelers and residents/employees commuting from the foothill communities of Coarsegold, Oakhurst and Ahwahnee to the FCMA. Of the \$138.1 million to be available from Measure T funds, approximately, \$30.1 million (22%) have been allocated in the RTP and SCS to two projects in the Southeast Madera County New Growth Area or along SR 41 between the Avenue 10 and Avenue 12 and along Avenue 12 between Road 38 and SR 41. These projects will not only service the Southeast Growth Area, but also provide significant access to other residents, commuters and travelers, from throughout the County. It should be noted that a majority (\$169.5 million) of the funding planned for allocation to the Southeast Madera County New Growth Area for major street and highway projects is from “local” sources or from the collection of traffic impact fees or development contributions to address the impacts of new development. MCTC has no control over the programming of these local funds.

MCTC agrees that certain development projects exemptions and other streamlined permitting requirements are authorized under SB 375. Such eligibility guidance has not been issued. MCTC will review the guidance once released and work with the local agencies to identify eligible projects.

Finally, MCTC is not “kicking the can down the road” and deferring mitigation it has responsibility for to the local jurisdictions. Reference paragraph 1 above in Response to Comment #43C. MCTC/MCTA developed a significantly progressive Measure T funding program approved by the voters in Madera County. The funding program addresses all transportation modes, not just streets and highways.

RESPONSE #D

It is hoped that Measure T funds will be able to leverage additional state and federal funding for a variety of projects in Madera County; however, MCTC has not assumed such leveraged funding in the 2014 RTP and SCS. MCTC has only identified the availability of known funding sources and has assumed a conservative funding scenario.

Regarding MCTC/MCTA responsibilities, reference Response to Comment #43C above. Only \$138.1 million in Measure T funding has been planned for regional capacity increasing street and highway projects throughout Madera County. The remaining Measure T funding is planned for other modal projects and rehabilitation or safety projects along the regional and local street and highway system. It is true that MCTC/MCTA administer the Measure T program but its authority does not allow it to change the eligible list of projects obtained in the Investment Plan. Furthermore, MCTC/MCTA does have the option of managing the delivery of projects should a local agency or Caltrans not be able to provide such services or they are not delivering the projects in a timely manner. MCTC/MCTA, if it were to take on that responsibility, would not be able to deviate from the list of approved projects contained in the Investment Plan; it could only manage their delivery, just as the local agencies and Caltrans do now.

Reference paragraph 1 above under Response to Comment #41D regarding leveraging Measure T funding.

Only approximately 10.7 percent or \$50.2 million of the total project funding available for capacity increasing street and highway projects or \$486.7 million between 2014 and 2026/27 or within the timeframe of the current Measure T program. Under the extension program or beyond FY 2026/27, approximately \$85.9 million or 33.6 percent of total funding (\$256 million) will be from the future Measure T program.

RESPONSE #E

Please see Table 7-5 included in the Final RTP and SCS document. This table identifies the capacity increasing projects and funding stream. Reference Responses to Comments #43C and D for other clarifications requested.

The following table provides a review of the various funding sources and costs associated with the capacity increasing street and highway projects referenced in the 2014 RTP and SCS. Roughly 19% of the funds in the RTP and SCS are controlled by MCTC including 47% of the Measure T and Future Measure T funding (although changes to the existing Measure T Program would require approvals including voter approval), and 60% of the Congestion Mitigation and Air Quality (CMAQ) funding. The 60% CMAQ funding is set aside for a grant program. The RTP and

SCS proposes to use these funds for the new SCS Grant Funding Program. The remaining 40% of CMAQ funds are allocated to the local agencies based upon population. MCTC does receive TDA funds that are based on population following a public hearing process for Unmet Transit Needs. It should be noted that the funds go to transit first based on unmet needs that are reasonable to meet and then are available for streets and roads.

MCTC 2014 RTP and SCS Capacity Increasing Project Costs and Funding			
Thru 2026			
	Amount	%	Comments
Total Project Costs	\$308,606,603		
Measure T	\$46,073,000	14.93%	Changes require approvals and voter approval
Leveraged-State	\$33,870,000	10.98%	(not controlled by MCTC)
Leveraged-Prop 1B Bond	\$51,100,000	16.56%	(not controlled by MCTC)
Other Local/State Funds	\$177,563,603	57.54%	(not controlled by MCTC)
	\$308,606,603		
Thru 2040			
	Amount	%	Comments
Total Project Costs	\$742,710,687		
Measure T	\$138,098,620	18.59%	(Includes planning projections for Future Measure T after 2027; subject to change, contingent on passage of extension)
Leveraged-State	\$163,514,225	22.02%	(not controlled by MCTC)
Leveraged-Prop 1B Bond	\$51,100,000	6.88%	(not controlled by MCTC)
Other Local/State Funds	\$389,997,842	52.51%	(not controlled by MCTC)
	\$742,710,687		

Funding sources identified in RTP and SCS available for funding transportation improvements include the following:

- ✓ **State Transportation Improvement Program (STIP)** – The STIP is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the state Transportation Investment Fund and other funding sources. It is administered by the California Transportation Commission
- ✓ **Regional Surface Transportation Program (RSTP)** – The RSTP program is a federal program that provides funds to be used by local agencies on road projects. MCTC has no control over these funds

- ✓ **Measure T** – ½% sales tax in Madera County. Sunsets in 2027. MCTC has control over the Regional Program funds and Impounded Flexible funds. The majority of funds are a pass through to local agencies
- ✓ **Future Measure T** – Future sales tax for transportation. Assumed that MCTC will control a similar % of Regional Program funds as current Measure T
- ✓ **Congestion Management & Air Quality (CMAQ)** – CMAQ is a federal program that supports surface transportation projects and other related efforts that contribute air quality improvements and provide congestion relief. MCTC has some authority over these funds. The CMAQ Grant portion (60%) is proposed to be used for the new SCS Program
- ✓ **Section 5307** – Is a federal program that provides funding for transit capital and operating assistance in urbanized areas and for transportation related planning. Not controlled by MCTC
- ✓ **Section 5311** – Is a federal program that provides funding for public transit in non-urbanized areas with a population under 50,000. Not controlled by MCTC
- ✓ **Local Transportation Fund** – ¼% sales tax from state sales tax to be used for transit and non-transit related purposes that comply with regional transportation plans. (subject to transit needs assessment) Fiscally administered by MCTC; spent by local agencies
- ✓ **State Transit Assistance** – derived from state sales tax on diesel fuel to be used for transit purposes. Fiscally administered by MCTC; spent by local agencies
- ✓ **Impact Fees** – Fees collected by local agencies to use on transportation projects. Controlled by local agencies
- ✓ **Fare box Revenue** – Revenue generated from public transit services

Financial information and assumptions that were applied to allocate available funding included the following:

- ✓ **STIP Funds** – Committed to 41 Passing Lanes & SR 99 Corridor for duration of planned horizon (through 2040)

- ✓ **Measure T** – Regional portion has all been programmed for projects
- ✓ **Future Measure T** – Regional program, Local program, SCS Funding Program (Mix to be determined)
- ✓ **CMAQ** – Proposal to use Grant portion for SCS Funding Program

Finally, MCTC does receive RSTP funds that are exchanged for State funds. These funds are allocated to the agencies based upon population for improvement projects that the local agencies determine.

RESPONSE #F

Flexible funding is committed to regional projects and the opportunity does exist for the public to weigh in at the MCTC and MCTA board meetings. The Measure T flexible funds have been impounded by MCTC in place of adequate fair share of impact fees as dictated by the Measure T Investment Plan.

RESPONSE #G

Measure T does include an amendment policy and procedure (Administrative Code of the Madera County Transportation Authority – Ordinance No. 2006-01), which states the following:

103.2 Amendments to the Investment Plan. The Board may annually review and propose amendments to the Investment Plan to provide for the use of Federal, State, and local funds; to account for unexpected revenues; or to take into consideration unforeseen circumstances. The Investment Plan may be amended as follows:

- (d) Adoption of the proposed amendment may require the affirmative vote of two-thirds of the Commissioners following a noticed public hearing and a 45-day public comment period.
- (e) The proposed amendment adopted by the Board shall require the approval of the Board of Supervisors and the majority of the City Councils representing a majority of the population in the incorporated areas of the County.
- (f) If the Board of Supervisors and the majority of the City Councils representing a majority of the population in the incorporated areas of the County approve the proposed amendment, then the Authority shall request the Board of Supervisors to call for a special election and submit the matter to the Madera electorate, which shall require a two-thirds vote of the electorate to enact the amendment.

In order for MCTC to change the list of projects and funding programs contained in the Investment Plan the procedure noted above would need to be implemented and approved as noted.

RESPONSE #H The project prioritization process is one of several processes utilized to determine placement and timing of capacity increasing projects for funding allocation. There are many aspects considered by MCTC as it develops the planned list of improvement projects submitted to MCTC by local agencies during development of the RTP and SCS. The evaluation criteria applied or purposes of this RTP and SCS was reviewed and commented on by the Roundtable and amended by MCTC staff and its consultant as they applied the criteria and prioritized the projects. Once the projects were prioritized, MCTC staff reviewed the available funding streams and the eligibility requirements for such funding on a project by project basis. This results in the most appropriate allocation of scarce federal and state funding to projects. Responses to Comments #43C, D, and E provide additional detail and results of this allocation process. Mitigation measures are not deferred as a result of the project prioritization process established to prioritize RTP and SCS improvement projects.

RESPONSE #I The RTP and SCS does utilize a minimum level of service (LOS) policy of D. LOS D is also the minimum LOS policy established by each of the local jurisdictions. As a result, there are no conflicts with the regional or local LOS policy.

RESPONSE #J Project prioritization or evaluation criteria was prepared for each mode of transportation. It is not possible to evaluate a bike and pedestrian project against a State Highway capacity increasing project. All other projects, besides the capacity increasing projects, will be funded as the local agencies apply for various funding program revenues through the Federal Transit Administration (FTA), CMAQ competitive application process, through the SCS Funding Program, or through the use of local funds.

Referencing the mitigation measures listed in Chapter 3, Section 3.17, MCTC has identified measures that should be considered by local jurisdictions as they allocate local funding to transportation projects.

It is appropriate for MCTC to identify mitigation measures that local agencies can reference and potentially implement to further the objectives of GHG reductions. The mitigation measures are not at odds with the evaluation criteria but support the evaluation criteria developed for other modes as noted above.

Project prioritization or evaluation criteria for all other modes were also presented to the Roundtable. All other modal projects (bike, pedestrian, and transit projects) submitted by the local agencies were reflected in the lists of projects by mode that are planned and will be funded over the life of the RTP and SCS. Each of the other lists of modal projects are contained in Chapter 5 of the

RTP and SCS. As noted above, the funding is either local, allocated in accordance with FTA requirements, allocated through the CMAQ competitive application process, allocated through the SCS Funding Program, or will be funded through other programs.

RESPONSE #K Reference Response to Comment #43J.

RESPONSE #L MCTC developed both SCS performance criteria and project prioritization or evaluation criteria. The SCS alternative scenarios were evaluated considering the SCS performance criteria and the individual improvement projects were evaluated utilizing the project prioritization or evaluation criteria. The reference to the Victoria Transport Policy Institute excerpt relates to criteria applied to evaluate the performance of the transportation system as a whole. Through the SCS alternative scenario evaluation process, MCTC did apply such criteria. Referencing Table 6-6 in Chapter 6 of the RTP and SCS, MCTC applied similar criteria, as well as others, to each SCS alternative scenario to determine transportation system performance.

RESPONSE #M MCTC does not believe that additional mitigation measures are required or necessary to enhance the project prioritization evaluation criteria process or to enhance the SCS alternative scenario evaluation process. MCTC will work with the 2018 RTP and SCS Roundtable to review the criteria for both the project prioritization and evaluation process as well as the SCS alternative scenario evaluation process.

RESPONSE #N MCTC has amended the referenced mitigation measures to add the following additional language:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.

RESPONSE #O MCTC will continue to encourage local agencies to implement mitigation measures contained in the RTP and SCS PEIR as local agencies submit project-specific EIRs and other environmental documents for comment prior to certification and prior to design of specific improvement projects. MCTC will also continue to review environmental documents prepared for draft general, area, community and specific plans developed by local agencies and provide comments as appropriate. MCTC takes a good deal of time to prepare the PEIR mitigation

measures that local agencies can follow and reference to reduce impacts. Local agencies review these mitigation measures to ensure that they reduce such impacts to the greatest extent feasible.

The RTP and SCS also states: “The specific impacts regarding other changes to the existing environment will be evaluated as part of the implementation agencies’ project-level environmental review process regarding their proposed individual transportation improvement project(s) and future land use development(s). Implementation agencies will ultimately be responsible for ensuring adherence to the mitigation measures identified prior to construction.” In addition, the PEIR also states the following: “The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies.”

RESPONSE #P

MCTC has reviewed each mitigation measure contained in the PEIR and has revised a number of measures to strengthen the intent. The revised mitigation measures are listed in Chapter 2 of the Final PEIR. MCTC has identified mitigation measures that local agencies “must” consider or implement consistent with state and federal law such as to address air quality and other requirements. MCTC does not implement a vast majority of the measures, the local agencies do. MCTC has identified those mitigation measures that it can implement versus those that rely on local agencies to implement.

RESPONSE #Q

An estimate of resource land, developed for purposes of comparing the alternative SCS scenarios, was completed and reflected in Chapter 4 of the Draft PEIR. The table is also included in Chapter 6 of the RTP and SCS. The estimate of consumed resource lands has also been added to Chapter 3 of the PEIR, Section 3.3. Specifically, Impact 3.3.1 addresses impacts to natural lands. To provide an estimate of the amount of impact resulting from the RTP and SCS, the following paragraph has been added to the Draft PEIR and is reflected in Chapter 3 of this Final PEIR:

Specifically, the RTP and SCS will consume approximately 1,233 acres of natural resource lands resulting from new land use development. Transportation projects also have the potential to consume natural resource lands. While the exact amount of land consumed by transportation projects is unknown given the lack of specific data needed to quantify such impacts, approximately 182 lane miles of expanded roadway is expected to occur as a result of implementation of the RTP and SCS.

RESPONSE #R

The linear length in lane miles has been identified as a change to the Draft PEIR in Chapter 3 to this Final PEIR. The linear length in lane miles associated with new or expanded transportation improvements is 182 (lane miles added between 2010 and 2040). All project alternatives (except the No Project) have the same set of improvement projects. As a result, there are no differences in terms of impacts among the alternatives studied. The linear lane miles associated with the No Project alternative is 188 (lane miles added between 2000 and 2035). For purposes of the analysis, it is not possible to accurately reflect the amount of agricultural land or resource lands that would be impacted by new or expanding transportation improvement projects. There are a number of key factors that must be considered in order to make such a calculation including, but not limited to the following:

- ✓ Amount of Right-of-way (ROW already acquired by the affected local agency or Caltrans
- ✓ Amount of ROW impacting agricultural operations vs. vacant of any use
- ✓ How wide the expanded or new facility will be
- ✓ Whether traveler safety is an issue that would require wider lanes, shoulders or median treatments
- ✓ The need for truck acceleration and deceleration lanes
- ✓ Extent of intersection improvements
- ✓ Bike lane requirements, lane type and width
- ✓ Pedestrian and streetscape improvements
- ✓ Provision for parking and type of parking
- ✓ Need for bus turnouts
- ✓ Staging area requirements
- ✓ Location of utility easements and relocation
- ✓ Road alignment
- ✓ The need for roundabouts now required along Caltrans facilities where warranted – require more ROW
- ✓ The need for passing lanes
- ✓ The need for continuous left turn lanes
- ✓ Other turn lanes

- ✓ The extent of drainage facilities and culverts
- ✓ Bridge requirements and footprint
- ✓ Overcrossing and undercrossing requirements and footprint
- ✓ Other considerations

While other MPOs may have estimated the impact of new facilities on agricultural operations, the estimates are rough considering the above. The exact extent of agricultural land impact by type of farmland can only be known once design plans and environmental review of each individual transportation improvement project is complete. It is not possible at the regional scale of the MCTC 2014 RTP and SCS PEIR. As such, mitigation measures to be carried out by those agencies responsible for implementing RTP and SCS transportation improvement projects are included in the Draft PEIR and will reduce the severity of potential significant impacts if they are carried out in accordance with the measures noted. The extent to which the measures will be effective can only be determined as environmental documents are prepared for individual improvement projects.

RESPONSE #S

The Program EIR was prepared to reflect a regional analysis of impacts related to the proposed project, as appropriate. The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County (the two incorporated cities and the County of Madera), the Madera County Transportation Authority (MCTA), and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, working with federal, state, other regional agencies, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, the MCTA (consistent with the Measure T Investment and Strategic Plans), other regional agencies, and local agencies. MCTC has no authority to prepare final design services,

environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans, and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

No additional statements or agriculture resource-related mitigation measures will be added to the Draft PEIR. As the following existing Draft PEIR mitigation measure reflects (Mitigation Measure associated with Impacts 3.3.1 through 3.3.3 of the Draft PEIR), MCTC will work with appropriate stakeholders and other organizations, including the American Farmland Trust, as well as its member agencies (two cities and the County of Madera), to develop appropriate policies that will protect agricultural and other natural land resources potentially impacted by transportation projects throughout Madera County.

Impact and Mitigation Measures 3.3.1 through 3.3.3: *“As part of the RTP and SCS formulation process; following approval of the 2014 RTP and SCS, the MCTC Policy Board will discuss directing MCTC staff to form a subcommittee to analyze, discuss and provide recommendations on possible policies aimed at the preservation of agricultural, natural and working lands; sustainable planning and infrastructure programs; and needs assessment activities, for inclusion into the transportation planning process at MCTC. Working collaboratively with community-based organizations, interested stakeholders and professional staff, this committee would be on-going, and discuss the formulation of policy and program language to:*

- *Develop a methodology to help implementing agencies quantify the conversion of prime farmland, unique farmland, farmland of statewide importance, and farmland of local importance associated with their proposed projects.*
- *Develop a methodology for implementing agencies to consider preservation ratios to minimize loss of prime, unique, and statewide importance farmland; and coordinate efforts to provide a mechanism for preservation activities.”*

The cited examples of regional projects noted beginning on page 9 of your comment letter are not regional projects in the same sense as the RTP and SCS.

The projects listed are specific improvement projects not a list of general improvement projects listed in a general plan, RTP or other similar plan or study.

As noted above, MCTC has identified a mitigation measure that will bring the local agencies together to discuss development of a methodology to help quantify the conversion of agricultural lands and natural and working lands including a methodology for implementing agencies to consider preservation ratios to minimize impacts.

Finally, Chapter 5 of the Draft PIER addresses cumulative impacts associated with the RTP and SCS.

RESPONSE #T

MCTC does not have control over any of the funding identified in the RTP and SCS to the extent that it can require Caltrans or local jurisdictions to mitigate the growth inducing impacts of transportation projects that they implement. MCTC does request that local jurisdictions or other applicants apply for CMAQ funding when available. Applicants must apply for such funds by filing an application that identifies how their project will reduce non-attainment air emissions. The only other funding source available to the region other than other federal and state funding is Measure T funding. Issues associated with Measure T funding have been discussed previously – reference Responses to Comments #43C, D, and G above.

RESPONSE #U

There is no time between the end of the comment period for the Draft PEIR and the release of the Final PEIR and the Final RTP and SCS to convene a committee and develop a policy related to the mitigation of agricultural impacts. The Draft PEIR and Draft RTP and SCS comment period ended on June 26, 2014 and the Final PEIR and RTP and SCS must be provided to commenting persons and agencies by July 12, 2014 in accordance with CEQA. As stated in the mitigation measure, MCTC will convene the committee following approval of the RTP and SCS.

RESPONSE #V

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS), prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB regarding the outcome of the SCS and is in the process of reviewing the traffic model. During development of the APS, MCTC will continue to work with

CARB to identify strategies that will help meet the GHG targets. It should be noted that MCTC has coordinated with the local agencies to identify how they intend to reduce GHG emissions. In addition, the City of Madera is in the process of preparing a Climate Action Plan.

It should be noted that MCTC, in consultation with the cities and the County, as well as the RTP and SCS Roundtable, has identified a number of strategies to reduce GHG emissions during development of the 2014 RTP and SCS including the following:

- ✓ Focusing growth in existing and emerging centers and along major transportation corridors
- ✓ Creating areas of dense and mixed-use development and walkable communities
- ✓ Higher densities within the City of Madera and the Southeast Madera County Growth Area resulting in a 91 percent increase in density by new growth compared to the Status Quo Scenario or “business as usual”
- ✓ Preserving existing agricultural and open spaces throughout Madera County
- ✓ Funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent as compared to the 2011 RTP funding allocation by mode
- ✓ Enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera.
- ✓ Earmarked funding for SCS Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips
- ✓ Infill development to use land already planned for growth and development in the inner core areas of the cities
- ✓ Additional service, retail, and industrial development in Madera County consistent with adopted general plans, which results in reduced trips and VMT for trips that currently travel to Fresno or Merced for such services or jobs
- ✓ Increased bike and pedestrian facility funding to enhance walkability and reduce trip making

RESPONSE #W

Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is required to prepare an Alternative Planning Strategy (APS). MCTC has already been in contact with CARB regarding the outcome of the SCS and is in the process of reviewing the traffic model.

During development of the APS, MCTC will continue to work with CARB to identify strategies that will help meet the GHG targets. It should be noted that MCTC has coordinated with the local agencies to identify how they intend to reduce GHG emissions.

RESPONSE #X

A majority (73% or 30.3 million) of State Transportation Improvement Program (STIP) funds eligible to MCTC for programming capacity increasing street and highway projects have been programmed for major projects along SR 99 to match Proposition 1B funds to widen SR 99 and for the Avenue 12/SR 99 Interchange Improvement Project, which is already underway. The remainder of STIP funds have been allocated for passing lanes along SR 41 between SR 145 and Road 200 to provide for increased capacity and safety improvements for recreational travelers and residents/employees commuting from the foothill communities of Coarsegold, Oakhurst and Ahwahnee to the FCMA. Of the \$138.1 million to be available from Measure T funds, approximately, \$30.1 million (22%) have been allocated in the RTP and SCS to two projects in the Southeast Madera County New Growth Area or along SR 41 between Avenue 10 and Avenue 12 and along Avenue 12 between Road 38 and SR 41. These projects will not only service the Southeast Growth Area, but also provide significant access to other residents, commuters and travelers, from throughout the County. It should be noted that a majority (\$169.5 million) of the funding planned for allocation to the Southeast Madera County New Growth Area for major street and highway projects is from “local” sources or from the collection of traffic impact fees or development contributions to address the impacts of new development. MCTC has no control over the programming of these local funds.

MCTC and its member agencies are concerned about reducing GHG emissions, and have agreed to significantly revise the allocation of funding to all modes of transportation. Compared to the 2011 RTP, funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent. As an example, MCTC has earmarked funding to SCS projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips. It is expected that once the traffic model is reviewed, that MCTC will be closer to meeting the GHG emissions reduction targets established by CARB. Once the model review is complete, MCTC will continue to work with CARB to develop the APS consistent with SB 375.

MCTC staff and its consultant worked with the MCTC RTP and SCS Roundtable to develop scenarios for evaluation. The scenarios presented and unanimously approved for consideration by the Roundtable were the Status Quo, Low Change,

ad Hybrid Scenarios. The Roundtable was attended by local agency representative, various private individuals, and a number of stakeholders including the Sierra Club, and other agencies. There were never any formal requests made by members of the Roundtable to provide additional scenarios for evaluation, including the scenario suggested in this comment letter. Alternative scenarios developed as part of the RTP and SCS were developed in accordance with requirements set forth in SB 375 and considering the approved general plans of each of the local jurisdictions. It was important that the preferred SCS scenario be ambitious and achievable. The Hybrid Scenario is both because it includes the various strategies listed above and because it is consistent with adopted land use policy set forth by the local agencies.

RESPONSE #Y

The Program EIR was prepared to reflect a regional analysis of impacts related to the proposed project, as appropriate. The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County, other regional agencies, and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments.

Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, working with federal, state, other regional agencies, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, the MCTA (consistent with the Measure T Investment and Strategic Plans), other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies,

other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

RESPONSE #Z

MCTC plans to immediately work with its member agencies and other stakeholders through a task force or committee to identify the purpose and procedures related to the SCS Funding Program. MCTC agrees that this program will reduce GHG emissions and that review of the traffic model and development of the APS will verify this expected outcome:

Mitigation Measure 3.6.1 contained in the Draft PEIR, Chapter 3, Section 3.6, Climate Change and in Table 1.1 in Chapter 1 of the Draft PEIR, has been revised to reflect that MCTC shall immediately form the SCS Funding Program committee or task force to define the program and process for funding allocation. At a minimum, the task force or committee will identify SCS Funding Program project evaluation criteria necessary to evaluate the potential of transportation and other projects to:

- ✓ Reduce GHG and air emissions
- ✓ Reduce VMT
- ✓ Reduce vehicle trips
- ✓ Reduce vehicle hours of delay and idling
- ✓ Increase transit trips
- ✓ Increase walkability
- ✓ Increase bike trips
- ✓ Support alternative modes or active transportation programs and services
- ✓ Other criteria that enables the task force or committee to clearly identify reductions in GHG emissions locally or on a regional basis

The evaluation criteria and funding program process would likely be similar to the current Congestion Mitigation and Air Quality (CMAQ) Funding Program, which gives priority to projects that reduce non-attainment pollutants.

MCTC will initiate the SCS Funding Program once the MCTC Policy Board has approved the 2014 RTP and SCS. MCTC staff does not currently have formal authority to move forward with development of the SCS Funding Program until the Policy Board has taken action on the RTP and SCS.

RESPONSE #AA

MCTC will move forward with the workshop as noted in Mitigation Measure 3.6.1 referenced in the Draft PEIR, Chapter 3, Section 3.6.

RESPONSE #BB MCTC has coordinated with the local agencies to identify how they intend to reduce GHG emissions. In addition, the City of Madera is in the process of preparing a Climate Action Plan.

MCTC does not have control over any of the funding identified in the RTP and SCS to the extent that it can require Caltrans or local jurisdictions to mitigate the growth inducing impacts of transportation projects that they implement. MCTC does request that local jurisdictions or other applicants apply for CMAQ funding when available. Applicants must apply for such funds by filing an application that identifies how their project will reduce non-attainment air emissions. The only other funding source available to the region other than other federal and state funding is Measure T funding. Issues associated with Measure T funding have been discussed previously – reference Responses to Comments #43C, D, and G above.

RESPONSE #CC Reference Response to Comment #43BB above.

RESPONSE #DD The major change scenario reflected in the Blueprint was not considered because it placed a considerable burden for higher density development on the City of Chowchilla and all other unincorporated communities in the County. The higher densities associated with the Moderate Change Scenario from the Blueprint were considered when the RTP and SCS Hybrid Scenario was developed. The Hybrid Scenario tasks the higher density characteristics of the Moderate Change Blueprint scenario and the lower density characteristics associated with the Low Change Blueprint scenario and marries them with the low change densities affecting the unincorporated areas of the County and the City of Chowchilla and the higher densities of the Moderate Change Blueprint Scenario and applies them to the City of Madera and the Southeast Madera County New Growth Area.

Ultimately the Policy Board had to select a scenario that they found was ambitious and achievable. After reviewing the data, comments, workshop and on-line survey results, and additional information supplied by local agencies and MCTC staff's two year RTP process, the MCTC Policy Board found the Hybrid Scenario to be their best option.

RESPONSE #EE CEQA does not require the identification of social or economic impacts. Further, the general plans of the local agencies were considered during development of the RTP and SCS Hybrid and other alternative scenarios. The Hybrid Scenario was chosen because it would provide the highest GHG reductions and is ambitious and achievable. The commenter assumes that the Southeast Madera County New Growth Area will not have a mix of employment types and housing types to

increase jobs-housing balance and jobs-housing mix objectives. Various area and other plans already approved for the Growth Area contain planned higher density land uses, as well as planned industrial land uses. These planned land uses will result in meeting such objectives.

RESPONSE #FF

MCTC will not revise the RTP and SCS as currently developed and will recommend to its policy board that it certify the Final Program Environmental Impact Report (PEIR) and approve the Final Draft MCTC 2014 RTP and SCS.

Comment Letter (Email) #45

FROM: Theresa Moss-Currier at ladyjasmine1956@gmail.com

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

MCTC, as the regional transportation planning agency, is only responsible for preparing the RTP and SCS, and working with federal, state, other regional, and local funding agencies to identify and program funding for transportation improvement projects nominated by Caltrans, other regional agencies, and local agencies. MCTC has no authority to prepare final design services, environmentally review, acquire right-of-way, or construct any transportation improvements listed in the RTP and SCS.

As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with CARB.

The California Department of Finance (DOF) reports population and employment projections periodically for each county in the State. In its development of the RTP/SCS, MCTC worked in coordination with the local agencies to identify growth areas within the County in accordance with the DOF projections to the year 2040. MCTC does not have land use authority nor does it determine the future population growth within the County. However, MCTC worked with the local agencies and Roundtable to identify areas that are approved for future growth considering the adopted General Plans. The Rio Mesa area or the Southeast Madera County New Growth Area, near SR-41 and Avenue 12, has been designated as a growth area since preparation of the Rio Mesa Area Plan in 1995. Based on DOF projections, Madera County is expected to experience a significant amount of growth through 2040 and the Southeast Madera County New Growth Area has been identified as an appropriate growth area by the County consistent with its adopted general plan.

As stated on Page 3-288 of the Draft PEIR, the cities of Madera and Chowchilla will remain the predominant urban centers in Madera County, with the other communities in the County representing a second tier of urban land use. The County's basic land use policy encourages the concentration of urban development in existing cities and infill of vacant land in urban areas to protect agricultural land, consistent with the 2014 RTP and SCS. For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local

jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

There are currently ***no indications*** from funding agencies ***that MCTC will not*** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter (Email) #46

FROM: Trudy Tucker at trudyt@cvip.net

DATED: June 26, 2014

RESPONSE #A Thank you for your comments.

The responsibility to nominate, potentially fund or partially fund, design, environmentally assess, and construct or implement transportation improvements listed in the Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) is the responsibility of local agencies in Madera County and Caltrans.

The local agencies are also responsible for preparing general plans to guide land use development and are responsible for approving proposed land use developments consistent with their general plans or amending their general plans to accommodate proposed developments. Each of these local agencies' and Caltrans' actions require subsequent environmental review. MCTC does not have land use authority, nor did SB 375 give MCTC such authority. By leaving out entitled development projects from the RTP and SCS, MCTC would not be properly recognizing the local agency land use authority.

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As a result of the responsibilities noted above, MCTC can only identify appropriate mitigation measures that should be carried out by the local agencies, other regional agencies, and Caltrans and further reference the need for subsequent environmental analysis. Where MCTC has responsibility to address an impact, it has identified mitigation measures that it has the authority to carry out or implement.

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also

required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

Section 3.4 of the Draft PEIR identifies impacts and appropriate mitigation measures related to air quality. In addition, MCTC is required to make findings of air quality conformity for the RTP before it is approved by federal agencies. Table 3-17 on Page 3-77 of the Draft PEIR shows the conformity results for the 2014 RTP projects. As shown in the table, the RTP and SCS projects passed all air quality conformity tests. The health-related air emissions in the air quality conformity analysis all are improving year by year and MCTC will be continuing its air quality planning efforts in close collaboration with CARB.

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As stated on Page 3-288 of the Draft PEIR, the cities of Madera and Chowchilla will remain the predominant urban centers in Madera County, with the other communities in the County representing a second tier of urban land use. The County's basic land use policy encourages the concentration of urban development in existing cities and infill of vacant land in urban areas to protect agricultural land, consistent with the 2014 RTP and SCS. For purposes of the 2014 RTP and SCS, focus of future growth and development consistent with the general plans was placed on in-fill and increased densities along major corridors.

Referencing RTP and SCS Chapter 6, Table 6-6 on Page 6-18, the preferred scenario would yield 75.4 percent single family households and 24.6 percent multiple-family households. This percentage of multiple-family housing would be

a doubling of the expected multi-family percentage of future households under the Status Quo Scenario or 12.9 percent. This 91 percent increase in density from the current trend or Status Quo Scenario is a **very significant increase** in density for Madera County. In fact, the City of Madera's General Plan has one of the highest planned density factors in the Valley. The City is considered a leader in the provision of planned higher density residential development. The City of Madera's planned densities are reflected in the Hybrid Scenario and therefore the RTP and SCS. Higher densities are also planned for the Southeast Madera County New Growth Area consistent with approved development plans and the Madera County General Plan. As noted in the RTP and SCS, higher densities across the remainder of the County are assumed in the Hybrid Scenario.

Finally, the Madera County Regional Housing Needs Allocation (RHNA) Plan is being prepared and reflects housing goals set by the State Department of Housing and Community Development (HCD). HCD has determined that Madera County must plan for at least 12,895 housing units between January 1, 2014 and December 31, 2023. Of the 12,895 housing units required in Madera County by December 31, 2023, 3,040 must be very low-income housing units, 2,155 must be low-income housing unit, 2,314 must be moderate-income housing units, and 5,406 must be above-moderate income housing units.

The land use modeling completed for all scenarios, including the preferred Hybrid Scenario, did consider the various types of housing and employment, transportation facilities and services available to support planned land uses, the spatial shift of housing, and the inventory of land planned for development. The Hybrid Scenario also considered jobs/housing balance objectives in its development and allocation of land uses.

Section 3.11 of the Draft Program Environmental Impact Report (PEIR) identifies impacts and appropriate mitigation measures related to hydrology and water resources. MCTC does not have land use authority, which rests with the local jurisdictions. Local agencies have the responsibility to approve or disapprove of land use development and require analysis of specific impacts and appropriate mitigation at the time of approval. MCTC will encourage the local agencies to implement the appropriate mitigation strategies identified in the Draft PEIR.

There are currently **no indications** from funding agencies **that MCTC will not** be eligible for various funding sources because it adopts an RTP and SCS that does not meet the GHG targets set by CARB. As noted above, SB 375 allows MCTC to adopt the RTP and SCS as currently prepared and is working with CARB to develop the APS.

Comment Letter #47

FROM: Jean Okuye, Vice President, Valley Land Alliance, P.O. Box 102, Cressey, California 95312, jeanokuye@gmail.com

DATED: June 26, 2014

Thank you for your comments.

RESPONSE #A

While the Draft PEIR indicates greenhouse gas (GHG) emissions are expected to increase in the future from 2005 levels based on modeling work performed by MCTC for the 2014 RTP and SCS, the SCS prepared by MCTC is in compliance with Senate Bill (SB) 375 regulations. Since Madera County is not expected to meet California Air Resources Board (CARB) per capita emission targets, MCTC is also required to prepare an Alternative Planning Strategy (APS). MCTC has been in contact with CARB and is in the process of reviewing the traffic model to better estimate trip making and vehicle miles traveled (VMT). MCTC will be working with CARB to identify strategies that will help meet the GHG targets.

MCTC, in consultation with the cities and the County, as well as the RTP and SCS Roundtable, has identified a number of strategies to reduce GHG emissions during development of the 2014 RTP and SCS including the following:

- ✓ Focusing growth in existing and emerging centers and along major transportation corridors
- ✓ Creating areas of dense and mixed-use development and walkable communities
- ✓ Higher densities within the City of Madera and the Southeast Madera County Growth Area resulting in a 91 percent increase in density by new growth compared to the Status Quo Scenario or “business as usual”
- ✓ Preserving existing agricultural and open spaces throughout Madera County
- ✓ Funding programmed for street and highway projects has dropped by 48 percent, and increased for pedestrian, bike, and transit projects by 73 percent as compared to the 2011 RTP funding allocation by mode
- ✓ Enhanced transit services throughout the County including recognition that Madera County Area Transit would provide seamless connectivity to the Fresno Bus Rapid Transit (BRT) system for services between Fresno and Madera.
- ✓ Earmarked funding for SCS Program projects that will reduce GHG emissions including streetscape projects to enhance walkability, and other projects that reduce vehicle miles traveled and vehicle trips
- ✓ Infill development to use land already planned for growth and development in the inner core areas of the cities

- ✓ Additional service, retail, and industrial development in Madera County consistent with adopted general plans, which results in reduced trips and VMT for trips that currently travel to Fresno or Merced for such services or jobs
- ✓ Increased bike and pedestrian facility funding to enhance walkability and reduce trip making

RESPONSE #B

As noted in the RTP and SCS, higher densities across the County are assumed in the RTP and SCS or in the Hybrid Scenario. Finally, the Madera County Regional Housing Needs Allocation (RHNA) Plan has been prepared and reflects housing goals set by the State Department of Housing and Community Development (HCD). HCD has determined that Madera County must plan for at least 12,895 housing units between January 1, 2014 and December 31, 2023. Of the 12,895 housing units required in Madera County by December 31, 2023, 3,040 must be very low-income housing units, 2,155 must be low-income housing unit, 2,314 must be moderate-income housing units, and 5,406 must be above-moderate income housing units. It is the local agencies that must identify how they will meet the market demand for housing consistent with the housing allocations by income groups identified above. The total amount of housing allocated by single-family and multiple-family households (occupied units) was accomplished between 2014 and 2040 considering the historic rates of housing by type, as well as the percentages identified in Table 6-6 in Chapter 6 of the RTP and SCS.

Comment Letter #48

FROM: Scott Morgan, Director, State Clearinghouse, Governor's Office of Planning and Research, 1400 10th Street, P.O. Box 3044, Sacramento, CA 95812-3044

DATED: June 17, 2014

RESPONSE #A Thank you for your comments. We have responded to the Caltrans Comment Letter – reference Response to Comment Letter #4.

From: Mahnke, Debra@Waterboards [<mailto:Debra.Mahnke@waterboards.ca.gov>]
Sent: Wednesday, May 07, 2014 4:37 PM
To: Dylan Stone
Subject: PEIR comments.

Dylan,

As we discussed on the phone today:

Mitigation Measure 3.5.1, Removal or Degradation of Sensitive Natural Communities, identifies that responsible and implementing agencies should commit to improved interagency coordination and integration of the National Environmental Policy Act and Clean Water Act Section 404 procedure and affected state and local agencies should commit to consideration of environmental concerns pertaining to U.S. water bodies and place a high priority on avoidance of adverse impact to waters of the U.S.

Recent court rulings and U.S. EPA rulings have diminished which water bodies are recognized as waters of the U.S. Because of this, many projects impact water bodies, including wetlands, considered non-jurisdictional; and therefore, not regulated by the Clean Water Act. These water bodies, however, are considered waters of the State, and are regulated by the California Water Resources Control Board under the Porter-Cologne Water Quality Control Act.

#A

Additionally, any project that requires a discretionary permit from a state agency requires compliance with the California Environmental Quality Act.

The PEIR should be acknowledging Porter-Cologne and the CEQA process in the mitigation measures.

Debra Mahnke
Water Resource Control Engineer
Central Valley Regional Water Quality Control Board
(559) 445-6281 FAX (559) 445-5910
Email: dmahnke@waterboards.ca.gov

<(((°>...`>(((°>..`>...>(((°>

From: Mahnke, Debra@Waterboards [<mailto:Debra.Mahnke@waterboards.ca.gov>]
Sent: Thursday, May 08, 2014 8:59 AM
To: Dylan Stone
Subject: Comments

Dylan,

I see in the EIR a reference to CEQA and CEQA guidelines. The checklist in the CEQA guidelines is a sample form, although everyone uses it. The checklist is currently being updated and the State Water Board has actually submitted changes to the language to remove the reference to “jurisdictional”.

#A

Debra Mahnke
Water Resource Control Engineer
Central Valley Regional Water Quality Control Board
(559) 445-6281 FAX (559) 445-5910
Email: dmahnke@waterboards.ca.gov
<<<<<<>...`..><<<<>...`..><<<<>



Received

JUN - 9 2014

May 29, 2014

Madera CTC

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Patricia Taylor, Executive Director
Madera County Transportation Commission
2001 Howard Road, Suite 201
Madera, CA 93637

Subject: 2014 Draft Regional Transportation Plan (Draft RTP)/Sustainable Communities Strategy for Madera County, and Draft Program Environmental Impact Report (Draft PEIR)

Dear Ms. Taylor:

Thank you for the opportunity to comment on the documents cited above. The California high-speed rail program will contribute to economic development and a cleaner environment, preserve and reduce the urbanization of agricultural lands, promote efficient mobility and increased livability within the Central Valley. These same principles are consistent with the Madera County Transportation Commission's Draft 2014 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft PEIR.

The California High-Speed Rail Authority (Authority) in collaboration with many partner agencies is implementing a statewide rail modernization plan that will result in near and long term regional and statewide benefits. The Authority recognizes that the RTP/SCS identifies a plan whereby Madera County will benefit from the realization of high-speed rail.

Also of note is the extensive discussion of coordination with the Authority and other rail service providers in the draft RTP. Projects such as the proposed *ACEforward* effort, which has involved the Central Valley Rail Policy Working Group, to extend portions of the Altamont Corridor Express (ACE) service to Merced County show the potential for the High-Speed Rail Program and regional transportation projects to complement each other.

The Draft RTP and Draft PEIR had very few references to high-speed rail funds, timelines, alignment or other issues related to proposed high-speed rail project located from the City of Madera to Chowchilla. For consistency with the Authority's latest adopted plans, we request your consideration of the following comments for inclusion in the RTP/SCS:

- The Authority's 2014 Business Plan and the 2013 California State Rail Plan state that high-speed rail passenger service from Merced to the San Fernando Valley will begin in 2022. Therefore, construction of high-speed rail through Madera County is scheduled to finish before the end of 2022.

#A

EDMUND G. BROWN JR.
GOVERNOR



- The Final Environmental Impact Report/Environmental Impact Statement for the Merced to Fresno high-speed rail section was certified by the Authority's Board of Directors on May 3, 2012. Your agency should have received a copy of this document or you can access it through the Authority's website http://www.hsr.ca.gov/Programs/Environmental_Planning/final_merced_fresno.html. The high-speed rail language in the Final RTP/SCS and Final PEIR should include a reference to the Final EIR/EIS.
- Implementation of the high-speed rail program will result in reductions to greenhouse gas emissions (GHG) across the state, including Madera County. Please update the GHG emissions analysis to reflect the program in that analysis.

#A,
cont

#B

Please also note that the attached correspondence from the California Air Resources Board indicates that a transportation planning agency producing an RTP and EIR should "reflect high-speed rail in their modeled network, include reflect high-speed rail as a project/strategy in their RTP/SCS, and take credit under SB375 for any resulting GHG reductions." The Authority can provide assistance on calculating GHG reduction numbers for your county if requested.

Thank you for considering these comments. The intent of these comments are to ensure consistency between the Madera County Transportation Commission's 2014 RTP/SCS and Draft PEIR, the Authority's role and contribution to regional rail modernization, and the current status of work on the high-speed rail project.


The Authority looks forward to ongoing collaboration with the Madera County Transportation Commission on issues of shared interest, including passenger rail modernization and expansion of complementary transit services that will leverage the state's and Madera County's investments in multi-modal transit infrastructure.

We invite you to visit our website at www.hsr.ca.gov for additional project information. Please contact Mr. Terry Ogle, Central Valley Regional Project Manager, at (559) 445-5113 or terry.ogle@hsr.ca.gov if you have any questions.

Sincerely,



Diana Gomez
Central Valley Regional Director
diana.gomez@hsr.ca.gov
(559) 445-5172



Mark A. McLoughlin
Director of Environmental Services
mark.mcloughlin@hsr.ca.gov
(916) 403-6934

Ms. Patricia Taylor
page 3

Enclosures:

Email from Jonathan Taylor Chief, Transportation Planning Branch, California Air Resource Board dated April 03, 2014

cc: Terry Ogle, Fresno Office, California High-Speed Rail Authority
Barbara Gilliland, Director of Planning, Parsons Brinckerhoff
Caltrans District 6 Regional Planning

From: Taylor, Jonathan@ARB [<mailto:jtaylor@arb.ca.gov>]
Sent: Thursday, April 03, 2014 5:29 PM
To: Cederoth, Meg
Cc: Mallory, David@ARB; Roberts, Terry@ARB; Gray, Jennifer@ARB
Subject: RE: HSR GHG and RTPs question

Meg,

In the original AB32 Scoping Plan we estimated a 1.0 MMT benefit from HSR in 2020. The draft updated Scoping Plan now out for comment does not take credit for any reductions from HSR, based on an expectation that any reductions would take place well after 2020. Since the updated Scoping Plan is not taking credit for any HSR reductions, it is not double-counting for an MPO to take credit for HSR as part of SB 375 GHG reductions. We do want to encourage MPOs to reflect HSR in their modeled network, include HSR as a project/strategy in their RTP/SCS, and take credit under SB375 for any resulting GHG reductions.

Jon

Jonathan Taylor, P.E.
Chief, Transportation Planning Branch
Air Quality Planning and Science Division
California Air Resources Board
jtaylor@arb.ca.gov
Ph. 916-445-8699
FAX: 916-322-3646

DEPARTMENT OF TRANSPORTATION**DISTRICT 6**

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*Serious drought.
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June 9, 2014

Ms. Patricia Taylor
Executive Director
Madera County Transportation Commission
2001 Howard Road, Suite 201
Madera, CA 93637

Dear Ms. Taylor:

Thank you for the opportunity to review the Madera County Transportation Commission (MCTC) Draft 2014 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). Caltrans, at District 6 and various divisions within the Department, have reviewed the Draft RTP/SCS, EIR, Evaluation Criteria/Safety and collectively offer the following comments:

DISTRICT 6:**Transportation Planning**

MCTC is commended for their efforts at striving to develop a guide that identifies transportation strategies that will improve mobility through 2040, while working towards reducing greenhouse gas (GHG) emissions to state-mandated levels over time and the negative environmental impacts of travel.

MCTC highly encourages public participation and involvement from their citizens, public agencies and local partners to address transportation goals and strategies. MCTC is commended for utilizing several public forums to reach out to the public.

MCTC is commended for their efforts to support public transportation through its public transit system. Madera County public transit system includes: Madera Area Express fixed-route and Dial-a-Ride, Madera County Connection, Eastern Madera Senior Bus, Escort Program, Chowchilla Area Transit Express, CatLinx, specialized social service transportation services, Greyhound, and taxi services. MCTC is also commended on specialized transportation for meeting the needs of the elderly population (Eastern Madera Senior Bus).

MCTC is commended for reserving a portion of its Local Transportation Funds (LTF) for the support and construction of new bicycle and pedestrian facilities.

MCTC has identified goals to guide their pursuit of quality growth and a highly integrated transportation system. These goals are meant to promote intermodal transportation systems that

encourage and stimulate the intermodal connectivity and movement of people and goods; to improve the transportation network by providing reliable transportation, protecting the environment, and improving the health of residents through multi-modal programs. MCTC's 2014 RTP/SCS document is meant to serve as a blueprint for addressing the current and future needs of a intermodal transportation network that will serve the community well. The following comments are offered for review:

Chapter 1.0 THE 2014 RTP AND SCS – A SUMMARY:

- Page 1-21: Environmental Justice Communities could be added to the list for which extensive efforts were made to achieve consultation and coordination. #A

Chapter 5.0 DELIVERING THE PLAN FOR CHANGE:

- Page 5-6 under Highway Arterial Performance: On June 20, 2013, Caltrans expressed concerns related to the methodology for establishing Benefit/Cost Ratio and scoring criterion for improved Level-of-Service (LOS) criteria and the qualitative evaluation criteria related to safety improvement. Caltrans requested to review the scoring formula for the evaluation criteria, the criteria used for all capacity increasing projects and how criteria affects the ranking of projects on the State highway system. The requests by Caltrans have not been accommodated. These previous questions remain unanswered and should be addressed. #B
- Page 5-26 under Mass Transportation, Other Accomplishments, Bus Service from Fresno-Madera to Yosemite National Park: There should be some mention of the general outcome of the feasibility study of bus service from Madera and Fresno to Yosemite National Park. #C
- Page 5-26 under Mass Transportation, Other Accomplishments, Short Range County-Wide Transportation Needs: There should be some mention of when MCTC plans to update the Madera County Short Range Transit Plan. #D
- Page 5-42 Bicycle and Trail Improvements, 8th Bullet: MCTC should investigate if there is a need to update the Madera County 2004 Bicycle Transportation Plan as well as bicycle plans for other jurisdictions within Madera County in light of the availability of Active Transportation Program funding. #E
- Page 5-42 Bicycle and Trail Improvements, Goals: Caltrans recommends that MCTC add a goal for the development of an Active Transportation Plan to define strategies to secure Active Transportation Program funding. Updated bicycle plans and assessment of previously funded Caltrans Environmental Justice and Community Based Transportation Planning Grant projects can provide the foundation for an Active Transportation Plan. #F

Chapter 10.0 ADDRESSING ENVIRONMENTAL JUSTICE

- Page 10-1 Addressing Environmental Justice: Caltrans commends MCTC for including a section on Environmental Justice within the MCTC RTP. Caltrans recommends a similar section to address consultation and coordination with tribal governments and communities to document efforts MCTC has and will continue to conduct in this capacity. Another recommendation is the development of an Environmental Justice committee or task force. Outreach to Environmental Justice communities, tribal governments and communities is already taking place but the creation of a committee would formalize and allow for better documentation of the efforts. #G
- Page 10-1 Addressing Environmental Justice, How Transportation Investment Affects Communities: There are efforts being accomplished by the North Fork Rancheria Tribe that can be included in this section. These efforts include the development of the tribe's transportation center and transit services. There may be efforts that have been conducted by the Picayune Rancheria of Chukchansi Indians that can be documented. Also note the previous comments on the need for a section on consultation and coordination with tribal governments and communities. Information on CalVans could also be added to this section. #H
- Page 10-5 Equity Analysis, American Indians and Alaskan Natives: MCTC should review the U.S. Department of Transportation Order 5610.2(a), Final DOT Environmental Justice Order- May 10, 2012 for the updated definition which reads, "(4) American Indian and Alaskan Native: A person having origins in any of the original people of North, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or (5) Native Hawaiian and Other Pacific Islander: people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands." #I

The following comments address the RTP/SCS Project Evaluation Criteria:

Previous comments were made on the RTP/SCS Project Evaluation Criteria in June of 2013 which have not been completely addressed with regards to the Evaluation Criteria, Safety. Caltrans' comments indicate that the ranking of the listing order plays some part in the weight of that category's score. There should be some weighted formula applied besides just adding up the points in each category. This should be submitted to Caltrans for review. Caltrans had previously asked for this scoring formula but it has not been supplied. MCTC increased the scoring range for safety from 1-4 to 2-8 (giving the appearance of being doubled); however, MCTC did not move up the Safety category to a position further up the ranking list and it still remains at rank 8. Safety should be as high a priority to the locals as it is to Caltrans. #J

In the earlier submittal of the RTP/SCS Project Evaluation Criteria there was the appearance of a separate scoring method/criteria for interchange projects. The current submittal does not contain a separate scoring method, it will be assumed that MCTC is applying the same criteria to all "capacity increasing" projects. This would be fine however there is no presence of a ranking order of constrained

projects in this submittal or in the prior submittal. It cannot be discerned whether projects on State facilities have moved up in rank from the last submittal with the new criteria.

#J

Prior comments suggested a modification of jobs/housing balances in the “mountainous regions”. Caltrans cannot locate the previous figures to compare with any new figures to ascertain whether this modification has been implemented.

#K

Office of Traffic Operations

The RTP document relied on the use of the MCTC Traffic Model as the method for analyzing a roadway segment’s existing LOS. While the model could be effective in developing a LOS over a broad roadway system, the model appears to lack sufficient analysis capability to accurately analyze a specific roadway segment. The type of facility, peak-hour factor, grade of terrain, lane width, lateral clearance, number of access points, median type, amount of heavy vehicles, or type of driver population were not taken into consideration in the LOS determination. In Chapter 2, the RTP (The Existing Transportation System, Level of Service, page 2-9) cites that the 2010 Highway Capacity Manual (HCM) categorizes two parameters of traffic in regards to LOS, uninterrupted and interrupted flow; however, it fails to explain how this relates to the RTP’s LOS analysis.

#L

The results of the RTP’s existing LOS segment analysis were shown on Figure 2-3 (page 2-11) which is an insufficiently labeled roadway map of Madera County. Figure 2-3 fails to suitably identify segments that operate with an unsatisfactory LOS. Furthermore, the RTP goes on to state on page 2-10 that “Results of the LOS analysis indicate that two (2) segments along the Regionally Significant Road System are currently operating at LOS “D” through “F” for State Routes...” when there are actually three segments shown along State Route (SR) 41 indicated on the Figure 2-3. The general locations of the segments with unsatisfactory LOS, in mountainous and rolling terrain along SR 41 and none located on the heavily traveled urban segments of SR 41 and SR 99, brings into question the accuracy of the analysis. It is thus recommended that the results of the MCTC Traffic Model’s existing LOS analysis should be verified with an analysis, using conventionally collected data, performed in accordance with the 2010 HCM.

The results of the RTP’s existing LOS segment analysis contradict recent Caltrans operational studies of SRs 41 and 99. For example, a recent project study report determined that SR 99, from Avenue 12 to Avenue 17, had an existing LOS D. Also, a recent operational analysis determined that SR 41 had an existing LOS D, or worse, from Avenue 12 to Road 208.

#M

A review of Exhibits 5-5 through 5-8 indicates that only some of the segments on SR 41 and a small portion of SR 99 are projected to operate with unsatisfactory LOS by the Year 2040. Nonetheless, the RTP (Major Corridor Deficiencies, Needs, Actions, page 5-17) acknowledges deficiencies along SRs 41 and 99, and discusses potential improvements. The RTP’s discussion is thus at odds with the LOS results provided on Exhibits 5-5 through 5-8. These 2040 LOS segment analysis results also contradict Caltrans operational studies, as previously stated.

#N

In MCTC's 2011 RTP, virtually all of the segments on SRs 41, 49, and 99 were projected to operate with unsatisfactory LOS by the Year 2035 (2011 RTP Exhibits 4-4A and 4-4B). The segments of SR 145 that are situated east of SR 99 were also projected to operate with an unsatisfactory LOS by 2035. The LOS analysis from the 2011 RTP is consistent with what Caltrans would expect from SRs 41 and 99 in Year 2040 without improvement. #O

In the Ramp Metering topic on page 5-20, the RTP states "Caltrans, through its correspondence with the County Road Department, has indicated that it intends to meter all on-ramps to State routes in such a manner to mimic traffic patterns in the Year 2000." This statement should be removed or modified. Caltrans does not recommend metering all ramps or setting metering rates to blindly mimic traffic patterns of the Year 2000. #P

The RTP's LOS segment analysis, the basis of this document's roadway study, is obviously significantly flawed. Thus, in its current form, it is not a reliable guide for the future needs of the roadway transportation system of Madera County. The analysis needs to reflect what the existing conditions are on State routes, be reasonably consistent with the findings of recent Caltrans studies, and support the discussion provided in the RTP itself. #Q

HEADQUARTERS:

Division of Transportation Planning: Office of Regional & Interagency Planning (ORIP)

The Office of Regional and Interagency Planning, Regional Planning Branch has completed its review of MCTC's Draft 2014 RTP. We thank you for the opportunity to review and provide comments on the RTP. We offer comments, suggestions, and questions on the following sections:

- RTP Checklist: The checklist must be signed and should reference item locations in the body of the RTP and give page numbers whenever possible. #R
- MCTC should consider Climate Change or Adaptation related projects. Flooding or extreme heat events could both have negative impacts on the State Highway System, as well as local county roads and city streets. #S
- Clarify that the RTP is coordinated with and consistent with the Public Transit-Human Services Plan. #T
- Pages 1-17 and 6-2: Senate Bill (SB) 375, the Sustainable Communities and Climate Protection Act of 2008 was signed into law on September 30, 2008. This should be corrected in the RTP. #U
- Pages 1-19 and 7-2: Provide a brief explanation as to why it is assumed that Measure T will continue (beyond 2027 to 2040) and that the RTP will continue to be financially constrained. #V
- Page 7-6: A \$287 million shortfall is anticipated if Measure T is not renewed. Briefly describe what steps are being taken to renew Measure T. #W

- It is understood, according to the draft RTP, that MCTC will not meet the 2020 5% or the 2035 10% Green House Gas (GHG) emission reduction Targets set by the California Air Resources Board (ARB). It is also understood that MCTC continues to work with ARB in this process, and is also in the process of developing an Alternative Planning Strategy (APS) to meet the requirements of SB 375. The APS timeline continues to be developed, but has not yet been finalized. #X

Division of Aeronautics

The Division of Aeronautics thanks MCTC for the opportunity to comment on the Draft RTP and SCS for 2014. After completion of a thorough review, the division of Aeronautics offers the following comments:

- Page 1-6 under Aviation: The first sentence states that the Madera County Municipal Airport provides services to approximately 88 Fixed-Based Operators (FBOs). This figure appears to be large for this airport. A FBO is a commercial business granted the right by an airport to operate on the airport and provide aeronautical services such as fueling, hangaring, tie-down and parking, aircraft rental, aircraft maintenance, flight instruction, etc. Additionally, it is stated that the Chowchilla Municipal Airport has 18 FBOs, which also appears to be a large number for this airport. #Y
- Page 1-14 under Goods Movement Needs and Actions: The last sentence states that “while air cargo operations at the Chowchilla and Madera Municipal Airports are desirable, the feasibility of transporting goods by air is questionable.” There should be a follow-up explanation to this statement as to why transporting goods by air is questionable.
 - According to the California Aviation System Plan Policy Element http://www.dot.ca.gov/hq/planning/aeronaut/documents/casp/policy_element_online.pdf, *Redefining airports as potential employment centers and **air cargo** as a specialized form of goods movement is necessary to dispel the misconception that airports are simply a place for commercial passenger arrivals and departures. The perception that airports are just places for airplanes to take-off and land has long been dismissed by aviation system planners. Instead, airports should more accurately be viewed as economic enterprise hubs, employment centers, mixed-use commercial business centers, bulk **cargo transfer centers**, transit hubs, and more. General Aviation (GA) airports could serve **cargo transfers** from both small planes and trucks. Such efforts can further develop **air cargo** and other bulk-transfer markets, provide needed revenues to the airport, and reduce intra-city truck trips, thus relieving congestion and improving air quality.* #Z
- Page 5-34 under Aviation: The first paragraph, last sentence states, “These improvements have been identified to address aviation system needs described in the *Regional Aviation System Plan* prepared by MCTC in June 1994.” This reference to a document that is 20 years old should be #AA

referencing the 2011 updated document. Also, the following website has updated needed airport improvements for reference: [http://www.mtc.ca.gov/planning/air_plan/RASP\)FinalReport.pdf](http://www.mtc.ca.gov/planning/air_plan/RASP)FinalReport.pdf).

#AA

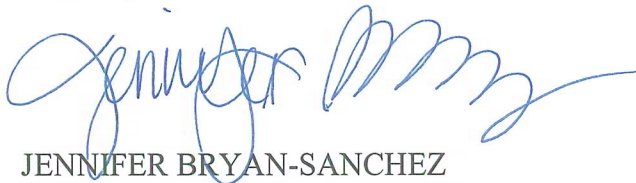
- Page 5-34 under Aviation System Needs and Actions:
 - The second bullet refers to future activity to include “review and revise the Airport Master Plans.” We commend MCTC for this. Refer to Advisory Circular: AC No: 150/5070-6B Airport Master Plan Guidelines for assistance in this process.
 - The seventh bullet states, “support expansion of capital improvement funds and sources for rural airports.” Refer to Caltrans’ website for possible funding sources: <http://www.dot.ca.gov/hq/planning/aeronaut/#>.
- Page 5-36 under Airport Land Use Commission (ALUC): The second paragraph states that the ALUC has developed the *Madera County Comprehensive Airport Land Use Plan* but it does not indicate what year. A year of completion or adoption should be inserted at this location.

#BB

#CC

If you have any questions concerning the comments provided, please call me at (559) 488-7307.

Sincerely,



JENNIFER BRYAN-SANCHEZ
Transportation Planning North Branch
District 6

C: Gail Miller, Michael Navarro, Jacqueline Hodaly, Marta Frausto, Lorena Mendibles, and Albert Lee of Caltrans
Ray Sukys, Eric Eidlin of FTA
Jack Lord, Scott Carson of FHWA

Christopher L. Campbell
Attorney at Law
ccampbell@bakermanock.com

June 23, 2014

VIA ELECTRONIC MAIL AND U.S. MAIL

Dylan Stone, Transportation Planner
Madera County Transportation
Commission
2001 Howard Road, Suite 201
Madera, California 93637
E-Mail: dylan@maderactc.org

Fig Garden Financial Center
5260 North Palm Avenue
Fourth Floor
Fresno, California 93704
Tel: 559.432.5400
Fax: 559.432.5620
www.bakermanock.com

Re: Availability of the Madera County Transportation
Commission Draft 2015 FTIP, Draft 2014 RTP/SCS,
Draft PEIR, and Corresponding Draft Conformity
Analysis

Dear Mr. Stone:

These comments are submitted on behalf of my client, Liberty Groves, LLC. We appreciate the process that the MCTC has gone through in developing this complex update of the RTP. We think that there are certain items that can be clarified to assist with implementation of the plan. In addition, there are a number of policy matters that should be stated in this plan so that the MCTC can make progress in addressing additional issues in the next update.

PRIVATE DEVELOPMENT IMPROVEMENTS

On page 5-20 of the draft 2014 RTP it states that certain street and roadway improvements will be financed through local development contributions. That section does not state whether the financing will be through direct payments from project developers or if the funding will come through the Impact Fee Program.

#A

It is important to structure the private development improvements so that no one will pay twice for the same improvement. That is, if the impact fee program includes an improvement that a developer has to build to support a development it would be inequitable to require that developer to also pay the impact fee for that improvement. We suggest that additional language be added to that section to specify that a developer who directly funds improvements that are scheduled to be funded by the Impact Fee Program will receive a credit against the Impact Fees that the developer would otherwise owe.

The Plan needs to clarify what improvements are included in the Impact Fee Program and those that are not. In addition, the Plan needs to clarify how developers can

equitably be reimbursed for delivering improvements prior to the time the Impact Fee program is able to deliver those improvements.

#A

KEY CORRIDOR STUDIES

AVENUE 9. The plan indicates that Avenue 9 is not slated to be widened to four lanes. Our analysis shows, however, that without widening Avenue 9 will be reduced to an unacceptable level of service prior to 2030. Given the 2040 time horizon for the Plan, widening Avenue 9 should be included. Alternatively, MCTC should at least include a commitment to study Avenue 9 and include appropriate improvements in the next RTP update. The study must include a practical funding program to deliver the necessary improvements.

AVENUE 12. The Plan provides for widening Avenue 12 to four lanes although studies for Gateway Village and other developments indicate that 6 lanes will be required. In addition, it is unlikely that the segment of Avenue 12 within the Madera Ranchos community can be widened. While a bypass south of the Ranchos has been proposed and discussed, a formal corridor study has not been done. We recommend that MCTC commit to performing a study of the Avenue 12 corridor from SR 99 to SR 41 with a completion date no later than the end of 2016.

#B

STATE ROUTE 41. Cal Trans is currently performing a study of the Highway 41 corridor from Avenue 12 to State Route 145. We recommend that the MCTC support and participate in that study as it is a crucial artery for southeastern Madera County. The most crucial issue is a viable funding plan to deliver the improvements as needed.

SUSTAINABLE COMMUNITIES STRATEGY

The Plan indicates that Madera County will not be able to meet the required 5% and 10% reduction in Green House Gas emissions because of development patterns in the foothills that inherently result in a high average amount of vehicle miles traveled per capita. The documents suggest a number of strategies to attempt to obtain waivers or other accommodations from the Air Resources Board due to the foothill resident issue. While those efforts are understandable and rational, there is no guaranty that they will be successful.

#C

We suggest that the Plan also address GHG compliance by aggressively promoting compact walk able mixed use development and other strategies for the valley portion of the County. With attractive options in the valley where long commutes will not be necessary, the County will be much closer to achieving compliance with the Sustainable Communities standards. Ultimately, if the County is unsuccessful in obtaining an exception from the GHG standards foothill development must be curtailed. Planning for the transportation infrastructure

Mr. Dylan Stone
Madera County Transportation Commission
June 23, 2014
Page 3

should consider strategies concentrating development in proximity to existing valley development.

#C

MEASURE T EXTENSION. Many of the transportation improvements scheduled through the 2040 planning horizon rely upon the extension of Measure T beyond its current 2027 expiration date. MCTC needs to adopt policy language and begin taking other steps to ensure that the Measure T extension occurs.

#D

Because of the significant risk that the voters may not approve an extension of Measure T, it is important that MCTC develop a contingency funding plan for those improvements.

COORDINATION OF DEVELOPMENT

The Plan does not have a delivery schedule for the various transportation improvements and it does not clearly state how the improvements and the funding will be coordinated. It would be very helpful for the plan to include a delivery schedule for road and highway improvements. That should be coupled with a method for coordinating the funding program with the need for improvements.

#E

REGIONAL PLANNING

There is a very significant amount of traffic between Madera County and Fresno County on a daily basis, it therefore, would be appropriate for the Plan and MCTC to commit to ongoing regional cooperation with the Fresno County COG to develop a regional transportation plan that includes both counties. In the future, traffic between the two Counties will become much more balanced than it was in the past. Therefore, the two Counties will need to jointly study the impacts on, needs and funding for the transportation infrastructure connecting the two Counties.

#F

Very truly yours,



Christopher L. Campbell
BAKER MANOCK & JENSEN, PC

CLC:TLW
cc: Igal Treibatch



U.S. Department
of Transportation
**Federal Highway
Administration**

California Division

June 23, 2014

650 Capitol Mall, Suite 4-100
Sacramento, CA 95814
(916) 498-5001

In Reply Refer To:
HDA-CA

Ms. Patricia Taylor
Executive Director
Madera County Transportation Commission
2001 Howard Road, Suite 201
Madera, CA 93637

SUBJECT: MCTC Draft 2014 RTP/SCS and Draft FY 2015-2018 FTIP

Dear Ms. Taylor:

Thank you for submitting the Madera County Transportation Commission (MCTC) Draft 2014 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and Draft FY 2015-2018 Federal Transportation Improvement Program (FTIP) to the Federal Highway Administration (FHWA) for comment.

Overall, we find that MCTC has done a good job in developing Draft 2014 RTP/SCS and Draft FY 2015-2018 FTIP documents that substantially meets the requirements of 23 CFR 450 and the *Final Rule on Statewide and Metropolitan Transportation Planning* as published in the Federal Register on February 14, 2007.

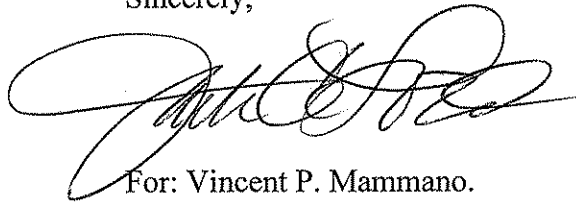
At this time, we have no detailed comments on the content of the draft documents. We do encourage MCTC to closely evaluate all comments that may be received from the public and other Federal and State agencies on the documents as you move forward towards adoption of the Final FY 2015-2018 FTIP and 2014 RTP/SCS. In order to assure timely approval of the Air Quality Conformity Determination when the California Department of Transportation (Caltrans) submits the new Federal Statewide Transportation Improvement Plan (FSTIP) later this year, we strongly encourage MCTC to perform final quality checks of the RTP/SCS, FTIP and the Conformity Analysis documents well in advance of adoption by your Metropolitan Planning Organization (MPO) board.

FHWA will continue to monitor MCTC's FTIP and RTP/SCS development process as MCTC proceeds towards adoption of the Final documents. We may provide additional comments on your Draft and Final submitted FY 2015-2018 FTIP and 2014 RTP/SCS as well as informally via email, phone consultations and our participation in various MCTC transportation planning activities.

In Fall 2014 FHWA would like to meet with MCTC staff in your Madera office to discuss this cycle of RTP/SCS development and any technical assistance you might require from FHWA to improve the update process for the next RTP/SCS cycle. This meeting will be arranged and coordinated by MCTC's FHWA MPO liaison Scott Carson.

Again, thank you for submitting the Draft 2014 RTP/SCS and FY 2015-18 FTIP in a timely fashion and in concurrence and cooperation with Caltrans and the other San Joaquin Valley MPOs in developing new RTP/SCS and FTIP documents to meet Federal and State update requirements. If you have any questions, please do not hesitate to contact Scott Carson at 916-498-5029 or scott.carson@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vincent P. Mammano', written in a cursive style.

For: Vincent P. Mammano.
Division Administrator



June 23, 2014

Dylan Stone, Transportation Planner
Madera County Transportation Commission
2001 Howard Road, Suite 201
Madera, CA 93637

Project: MCTC 2014 RTP/SCS Program EIR and Conformity Analysis

District CEQA Reference No: 20140285

Dear Mr. Stone:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the *Draft Program Environmental Impact Report for the 2014 Regional Transportation Plan & Sustainable Communities Strategy (2014 EIR)* and the *Draft Conformity Analysis for the 2015 Federal Transportation Improvement Program and 2014 Regional Transportation Plan (Conformity Analysis)*. The District offers the following comments:

2014 RTP/SCS Program EIR

- Chapter 3.4 of the *2014 EIR* references the District's various attainment plans and strategies for improving air quality in the San Joaquin Valley (pages 3-47 through 3-50). However, the discussion does not include the District's two most recently adopted air quality plans. The *2014 EIR* should reference the District's *2012 PM2.5 Plan*, which addresses the 2006 PM2.5 NAAQS, and *2013 Plan for the Revoked 1-Hour Ozone Standard (2013 Ozone Plan)*, which addresses the remaining requirements under the 1979 revoked 1-hour ozone NAAQS. Additional information regarding these plans can be found on the District's website at:

Ozone Plans webpage: http://www.valleyair.org/Air_Quality_Plans/Ozone_Plans.htm

PM Plans webpage: http://www.valleyair.org/Air_Quality_Plans/PM_Plans.htm.

- Page 3-54 of the *2014 EIR* states that mobile sources (on-road and off-road) contribute to 64% of all NOx and 53% of all ROG emitted from anthropogenic sources in the Valley. Appendix I of the District's *2013 Ozone Plan* demonstrated

#A

#B

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region

4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)

1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region

34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

- that in 2015 mobile sources (on-road and off-road) will contribute to 83% of the Valley's NOx emissions and 22% of the Valley's ROG emissions. Please cite the District's *2013 Ozone Plan* and revise these values accordingly. #B
3. Some of the attainment designations/classifications specified in Table 3-13, Madera County Attainment Status, of the *2014 EIR* (page 3-60) are listed incorrectly. The District's current attainment status can be located on the District's website at: <http://www.valleyair.org/aqinfo/attainment.htm>. Please reference the District's website for the correct designations/classifications and revise the designations/classifications as appropriate. #C
4. Page 3-85 of the *2014 EIR* states that Madera County is a nonattainment area for PM10. Please revise this to state that Madera County is a maintenance area for PM10. #D
5. Page 3-76 of the *2014 EIR* states that the attainment year for both the 1997 and 2006 PM2.5 NAAQS is 2014; however, the attainment deadline for the 1997 NAAQS is 2015 based on data from 2012-2014 and the attainment deadline for the 2006 NAAQS is 2015 based on data from 2013-2015. Please revise this paragraph accordingly. #E
6. Please provide a citation to the source used to develop Table 3-4, Ambient Air Quality Standards in the *2014 EIR* (page 3-43). #F
7. Please include citations to the sources that were used to develop Tables 3-5, 3-6, and 3-7 (pages 3-50 to 3-51) in the *2014 EIR*. While the *Conformity Analysis for the 2015 FTIP and 2014 RTP* clarifies that these emissions budgets were revised following the adoption of each applicable District State Implementation Plan (SIP), this is not clarified within the *2014 EIR*. #G
8. Please cite the sources referenced for the percentage of CO and PM10 emissions contributed by mobile sources on pages 3-54 and 3-55 of the *2014 EIR*. #H
9. Page 3-82 of the *2014 EIR* states that PM10 emission reductions will be minimal when comparing 2010 emissions to the 2040 Build Option discussed in the *2014 RTP/SCS*; however, Table 3-21 shows a slight increase in PM10 emissions from 0.35 tpd to 0.36 tpd. Please revise this statement accordingly. #I
10. In Table 3-17 (page 3-77) of the *2014 EIR*, the 2014 emissions budget for the 1997 and 2006 PM2.5 NAAQS is listed as 8.1 tons per day (tpd) in relation to the 2014 estimated emissions and 8.5 tpd in relation to the 2017, 2025, 2035, and 2040 estimated emissions. The 2014 budget should be 8.1 tpd for each line. Please revise the lines accordingly. #J
11. Page 3-64 of the *2014 EIR* states, "*The ARB 2008 PM2.5 Plan...*" Please revise this to state, "*The District's 2008 PM2.5 Plan.*" #K

12. Page 3-80 of the 2014 EIR incorrectly states “2014 FTIP” instead of “2015 FTIP.”
Please revise this to reflect the correct year.

#L

Conformity Analysis

1. Page 18 of the *Draft Conformity Analysis* states that the attainment year for the 1997 and 2006 PM2.5 NAAQS is 2014; however, the attainment deadline for the 1997 NAAQS is 2015 based on data from 2012-2014 and the attainment deadline for the 2006 NAAQS is 2015 based on data from 2013-2015. Please revise this paragraph accordingly.
2. Page 14 of the *Conformity Analysis* states, “EPA’s final rule implementing the 2008 ozone standard,” but EPA has not yet finalized approval of the proposed implementation rule. Please revise this sentence accordingly.
3. In Table 6-1 and the “2014 RTP Conformity Results Summary—MADERA” in Appendix C of the *Draft Conformity Analysis*, the 2014 budget for the 1997 and 2006 PM2.5 NAAQS is listed as 8.1 tons per day (tpd) in relation to the 2014 estimated emissions and 8.5 tpd in relation to the 2017, 2025, 2035, and 2040 estimated emissions. The 2014 budget should be 8.1 tpd for each line.
4. Please correct the following typographical errors:
 - a. Page 12 states that the 2007 Ozone Plan approval was effective on April 20, 2012; however, this approval was effective on April 30, 2012.
 - b. Page 12 states, “approved SP budgets,” but it should state “approved SIP budgets.”

#M

#N

#O

#P

If you have any questions or require further information, please contact Jessica Willis by phone at (559) 230-5818, or by email at jessica.willis@valleyair.org.

Sincerely,

Arnaud Marjollet
Director of Permit Services



For: Chay Thao
Program Manager

AM:jw

From: Barbara River [<mailto:rivybar44@yahoo.com>]
Sent: Tuesday, June 24, 2014 2:59 PM
To: Dylan Stone
Subject: Prospective Madera County Sprawl

We have too little water and too many people as it is now. Having already missed an important deadline (only one of two counties to do so) as the newly proposed development would add even more pollution to both our ground water and our air, please reconsider this proposal. We need to start being far more conscious both of what we are being made to breathe and drink.

Thanks you, Barbara River

From: Ellen Williams [<mailto:ellenjanw@gmail.com>]
Sent: Tuesday, June 24, 2014 7:42 PM
To: Dylan Stone
Cc: data.nations@gmail.com
Subject: Madera County RCS/SCS

Dear Sir:

I was disappointed to hear that Madera's long-term planning will increase greenhouse gases rather than decreasing them, as 56 of the 58 counties in California will do. As a kindergarten teacher, my students already were confined to our classroom this year due to poor air quality. I anticipate more of those days. Increasing greenhouse gases will make it harder for farmers to farm. It will make our climate even hotter than it is already. As relatively affluent, educated residents of the county, we are thinking about leaving the county. Poor air quality, increased traffic and pollution due to the housing developments being considered and approved at 41 and 12, and serious water issues are the main reasons. Madera County and the Board of Supervisors can choose responsible growth or deterioration of our quality of life. I hope you will choose the latter.

Sincerely,

Ellen Williams
Madera Ranchos

From: michaela agabashian [<mailto:purpleasphodeleye@gmail.com>]
Sent: Tuesday, June 24, 2014 11:15 AM
To: Dylan Stone; Gary Lasky
Subject:

Dear Madera County Transportation Commission,

We the Agabashian family believe the recent plans underway the build the Rio Mesa development off of highway 41 to be ludicrous. The draft 2014 Madera RTP/SCS would be the first plan in the state to miss its greenhouse gas (GHG) reduction targets under Senate Bill 375. Not only would this plan not reduce climate pollution; it would actually *increase* per capita greenhouse gas emissions by 9% by 2040. One key reason for this failure is that Madera County is still planning New Towns, built on farmland, far from the City of Madera and existing employment centers. Development means more strain on our existing--and finite--water supply. Water for new development will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation.

In any case, the true issue here is your organizations willingness to further strain the earth with pollution that will be caused by this new urban sprawl in a community already rife with it, when in reality, the earth is already experiences enough abuse at the hands of humanity as things now stand. If each human being were to truly take into account the affect of their actions, instead of buying into the base proclamation of commerce and business which so heavily rely upon eating up the land, and act in respect to the earth then surely the world would be a much more healthy and beautiful place less rife with pain. We heartily disagree with your plans and all plans which are similar.

Signed Michaela Agabashian with Fresno Against Fracking

Marc Agabashian

Veronica Agabashian

From: michaela agabashian [<mailto:purpleasphodeleye@gmail.com>]
Sent: Tuesday, June 24, 2014 11:05 AM
To: Dylan Stone
Subject:

Dear Madera County Transportation Commission,

We the Agabashian family believe the recent plans underway to build the Rio Mesa development off of highway 41 to be ludicrous. The draft 2014 Madera RTP/SCS would be the first plan in the state to miss its greenhouse gas (GHG) reduction targets under Senate Bill 375. Not only would this plan not reduce climate pollution; it would actually *increase* per capita greenhouse gas emissions by 9% by 2040. Other rural regions achieve much better results. For example, the Tahoe region would reduce per capita GHG by over 7% by 2035. One key reason for this failure is that Madera County is still planning New Towns, built on farmland, far from the City of Madera and existing employment centers. Development means more strain on our existing--and finite--water supply. Water for new development will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation.

From: Sam Molina [<mailto:100stm001@gmail.com>]
Sent: Tuesday, June 24, 2014 9:28 PM
To: Dylan Stone
Cc: Gary Lasky
Subject: Draft RTP/SCS plan

Dear Madera Commissioners,

It is my understanding that there is a push for more sprawl throughout the county of Madera. Here are some things I feel you should be aware of before determining whether or not urban sprawl is the best for our communities. To develop more housing away from the City of Madera would mean creating more of a strain on our existing--and finite--water supply. We both know that water will be needed for this new development and is either going to be taken from our groundwater supply needed for the city or from water that has already been allocated for farmland.

Please do consider an alternative to urban sprawl, and develop a scenario that also meets greenhouse gas reduction targets.

Sincerely,

Samuel Molina
559-473-6096

"We secure a better future for our children, when we instill in them the courage and will to act!"

From: Edward Estes [<mailto:edwardestes@aol.com>]
Sent: Tuesday, June 24, 2014 2:08 PM
To: Dylan Stone
Subject: New Town

Dear Sirs,

June 24, 2014

It seems incredible to me that you are still encouraging the massive urban sprawl being planned along Highway #41.

There are so many reasons such developments should not be allowed:

Tax Revenues from shoppers and employers would accrue to Fresno County, not Madera County.

Public services would have to be provided by Madera County.

Water, already scarce would have to be provided for all those new lawns (sorry, gray water would not suffice).

All those people would have to commute to work by car, aggravating the already bad air quality in Fresno.

The housing to be built would not be affordable for most Fresno residents

More traffic congestion on #41

There are many more reasons: fire stations, electric, water, sewer lines, etc. would have to be provided.

And against all this is the only reason I can think of for such development: profits for developers and real-estate interests.

Why are we doing this?

Ed Estes
Oakhurst Democratic Club

From: JEAN HAYS [<mailto:skyhorse3593@sbcglobal.net>]
Sent: Tuesday, June 24, 2014 1:01 PM
To: Dylan Stone
Subject: Comment on RTP/SCS

The above-named plan is bad for the Earth and bad for the San Joaquin Valley. It misses the greenhouse gas reduction targets under Senate Bill 375. It would increase per capita greenhouse gas emissions by 9% by 2040. This is only one reason why no one would be able to live here by that time. The atmosphere would simply be too polluted. Also, our water supply would not satisfy the needs of the additional proposed communities to be built. As the late Carl Sagan said: *Anything else you're interested in is not going to happen if you can't breath and air and drink the water. Don't sit this one out! Do something. You are, by accident of fate, alive at an absolutely critical moment in the history of our planet.* I am doing something now by writing this. Please put people's lives above the importance of developer's dollars. Our Earth depends upon it!

For the Earth,
Jean Hays

WILPF Earth Democracy National Issues Group, Fresno Branch

From: Jay Hubbell [<mailto:jayhubbell@comcast.net>]
Sent: Wednesday, June 25, 2014 5:39 PM
To: Dylan Stone
Cc: Gary Lasky
Subject: MCTC recently released a draft RTP/SCS and Environmental Impact Report. Public comment
Importance: High

RE: The MCTC recently released a draft RTP/SCS and Environmental Impact Report.

My public comment:

My concern is that there is no mitigation of the adverse effects of air pollution that will be aggravated by such a proposed influx of new population who will become a new commuter class for employment in the Fresno/Clovis metropolitan area. There is no provision or stipulation for any kind of mass transit or public transportation. There is no requirement that the developers will have to shoulder the financial burden of the necessary increase in transportation infrastructure.

Berl Jay Hubbell
5965 E. Shields Ave. Unit 170
Fresno, Ca 93727-8061
559-292-4905

From: blainegray@aol.com [<mailto:blainegray@aol.com>]
Sent: Wednesday, June 25, 2014 6:34 PM
To: Dylan Stone
Subject: public transportation

Dear MCTC,

The Counties RTP plan fails to meet State and Federal air pollution goals of reducing criteria pollutants and Green House Gases and creates a plan where we are out of compliance with the Federal Clean Air Act and SB 375. This is simply unacceptable future planning for the people of Madera County, because of its focus on creating wider roads with our tax dollars close to open spaces, farmland and vital natural resources. Madera county should consider projects that help to make better public transportation for everyone.

Blaine Graybill

From: Don Manro [<mailto:tulerue@gmail.com>]

Sent: Wednesday, June 25, 2014 7:41 PM

To: Dylan Stone

Subject: Madera County RTP/SCS plan and Draft Environmental Impact Report

The proposed project is inadequate to meet the needs of the region and the planet for reducing greenhouse emissions. Apparently, the county is submerging these needs beneath those of the housing industry to resist sustainable urban development and to promote sprawling communities. This is unacceptable behavior as it will result in the permanent uninhabitability of the earth. I urge you to go back to the drawing board and produce a plan that meets at least the minimum SB 375 targets.

--Don Manro

From: Paul OBara [mailto:yo_wutzup@yahoo.com]
Sent: Wednesday, June 25, 2014 11:19 PM
To: Dylan Stone
Cc: data.nations@gmail.com
Subject: RTP/SCS Draft

Dear Members of the Madera Co. Transp. Comm.,

Would you kindly reconsider / re-draft the RTP/SCS as proposed ?

As written, it does not seem to sufficiently address the importance & need to reduce greenhouse gases, per Senate Bill 375 ! What about supporting public transit, more bike paths / lanes, halting "sprawl" and going for affordable, multi-family housing within city limits, green areas & more parks in-town, etc. ?? The costs for these could be offset by State / Federal Grant Funding.

Basically, we DON'T need increased GHG emissions - we DO need good, clean air for you, me & all the 'kiddies' out there, our future generation, right ?

Sincerely,

Paul O'Bara

a concerned central valley citizen

yo_wutzup@yahoo.com

cell:(559)288-9156

-----Original Message-----

From: Ron Martin [<mailto:martinrj93638@yahoo.com>]

Sent: Wednesday, June 25, 2014 11:44 PM

To: Dylan Stone

Subject: revise the RTP & SCS

The Madera Sustainable Communities Strategy plan needs change, to guide us into a future of avoiding the worst effects of global warming. Many of our leaders, such as planners of Madera's RTP/SCS, seem oblivious to the fact that they are leading the society to create tremendous suffering or death of our grandchildren. These leaders may try to blame individuals for continuing to burn gasoline or fail to buy CFLs, but we know that this cannot stop climate change without leadership from the top to make the large changes that are needed. The leaders need to act as statesmen. Our leaders need to block the plans of those who pursue profit with big income projects such as New Towns planned for the Friant area. This development has NO place in rational planning for the climate change is happening NOW.

Pay attention to state greenhouse gas reduction targets and rational water-use projections as the Madera RTP/SCS is set. And realize that these goals are merely starting points toward doing the right thing, not complete solutions to be re-negotiated and whittled away in an effort to please wealthy developers and their lobbyists and lawyers. We put planners in office to exercise reality-based, future-focused leadership, to take the adult role, and lay down the law to those who would try to ignore what is happening to the planet while they seek high returns on their investments. Do not approve a RTP/SCS that includes development in rural land such as New Towns. Require infill development.

Ronald J. Martin, Ph.D.

4721 N. Cedar Ave., apt. 113, Fresno Square, Fresno, CA 93726-1081

(559) 222-5524, home; (559) 394-9417, cell; (559) 600-9233, work

From: Ruth Afifi [<mailto:ruth37@gmail.com>]
Sent: Wednesday, June 25, 2014 10:36 PM
To: Dylan Stone
Subject: Draft RTP/SCS plan.

Dear Madera Commissioners:

Reducing greenhouse gas emissions (GHGs) is recognized by the State of California as crucial for the health of our people. Automobiles are a major GHG source. Under SB 375 legislation, San Joaquin Valley counties need to reduce per-person Vehicle Miles Traveled (VMTs) by 5% by 2020 and by 10% by 2035. Under the proposed Regional Transportation Plan, Madera would actually show a 9% *increase* in GHG emissions and would be the first plan in the state to miss its GHG reduction targets.

We cannot afford to have the worst performance of any region in the state. A poor Sustainable Communities Strategy will hurt state and federal grant funding. Madera County needs to stop encouraging urban sprawl with its plan for new cities to be built on precious, irreplaceable farmland.

Sincerely,

Ruth Afifi

559-297-8582

From: taiharurutressa@gmail.com [<mailto:taiharurutressa@gmail.com>]
Sent: Wednesday, June 25, 2014 3:35 PM
To: Dylan Stone
Subject: Madera County RTP/SCS 2014 Draft Plan

Dear Madera County Transportation Commission staff:

The current 2014 Madera County RTP/SCS plan would increase per capita greenhouse gas emissions by 9% by 2040, instead of decreasing greenhouse gas emissions!

Extreme climate situations such as our current drought and record-breaking heat waves are destructive to Madera County commerce, and to the health of Madera County taxpayers.

Please redevelop the Madera County plan for consideration by our MCTC board so that the plan meets all greenhouse gas reduction targets.

Most sincerely,

Tressa Prael, Madera County taxpayer and senior citizen of many years P.O.
Box 1376 North Fork, CA 93643-1376

From: anaandjoe@comcast.net [<mailto:anaandjoe@comcast.net>]
Sent: Thursday, June 26, 2014 12:28 PM
To: Dylan Stone
Cc: [rendawnmom@gmail.co](mailto:rendawnmom@gmail.com)
Subject: RTP/SCS

When we travel down Highway 41 we must take into effect any kind of business that would be considering overload of use of this main highway to Yosemite. We need to trim back on the appetite for urban sprawl any or all commercial trucking that would cause over usage of this road. This also includes housing development where the inhabitants will consider Fresno, there town.

The 2014 draft of Madera RTP/SCS needs to develop a scenario that meet the needs of a sustainable community strategy that will benefit Madera County and its resources.

From: ANDREAS MARKLE [<mailto:cougarncouzinx@sbcglobal.net>]
Sent: Thursday, June 26, 2014 9:23 AM
To: Dylan Stone
Cc: data.nations@gmail.com
Subject: Sustainable Communities Strategy

I am writing today to voice my concerns with the direction that Madera County is taking regarding the increase in building homes and communities throughout the county. Many of the residents of Madera County live here to get away from the urban sprawl that is Fresno and all the associated problems of a large city, such as crime, transportation problems, over crowding, etc. I would truly hate to see a great community such as Madera Ranchos become Old Fig Garden in the next 20-30 years. The direction Madera County is heading, that will become reality.

However, more importantly, is the need for water. The San Joaquin Valley is best known and should continue to be the agricultural center for the world. With homes replacing farm lands, that will diminish greatly. With drought and water usage by more and more homes and communities, it means even less for our farmers. Development means more strain on our existing--and finite--water supply. Water for new development will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation. Many homeowners now are abandoning their homes, because they cannot afford (or the long wait times) to have a new well put in. Some homeowners are having to drill as far as 500 ft to reach water, and that is now. What happens when you add additional strain to our water supply?

I understand the need to build new homes and communities - Tax Base. But at what cost do the citizens that have lived here for generations and the future citizens pay for it? Communities with no water, no jobs, and more expensive produce and livestock? Let Fresno learn to infill on its existing neighborhoods and stop the sprawl into Madera County. Think outside the box and think of the future.

Thank you,
Andreas Markle

Hello Madera County Transportation Commission,

I am a resident from Madera Ranchos for 25 years and I am very concerned about the future quality of the Commonwealth of Madera County and what the RTP will do to our community. The counties 2014 Regional Transportation Plan will create a short-sighted “boomtown” legacy effect because it fails to comprehensively consider and avoid the actual external costs of public health impacts on land, air and water degradation in the planned Southeastern growth areas and county-wide. These external costs of “air pollution” should be debited against monitory income from future taxes. Furthermore, the Regional Transportation Hybrid Plan does not allow a margin of safety for the county to be successful in meeting State and Federal National Ambient Air Quality Standards for Ozone (8-hour), Particulate Matter 2.5 as well as for VOC’s and Greenhouse Gases. Unfortunately for the public, this plan is unacceptable for the health and wellbeing of existing and future Madera County residents, particularly the most vulnerable, youngest and oldest residents.

Today’s science has shown us that valley air pollution is literally changing our children’s’ DNA and damaging their immune systems. It is crucial that strong limits are set on GHG pollutants and also that there is money to handle the reality of living with the consequences of climate change in our community. A more precautionary approach should be taken in the RTP to protect and ensure the public’s health and wellbeing through more mass transit and bike programs from rural to urban areas, across counties and in planned developments closer to the planned High Speed Rail system along highway 99 towards the Fresno and Merced train stops. Additionally, the RTP does not address energy in ways that increase the communities ability to create as much of its own energy as possible such as with renewable energy solar, biodiesel, and wind to drive transportation & developments while reducing pollution and reliance on expensive fossil fuels?

If better plans were adopted that included more mass transit and higher densities it would help the county to meet its air quality goals but this is not the case in the Hybrid plan. In contrast, the Hybrid plan prioritizes long-distance single car commutes to other counties for work and does not adopt land use patterns that would force individuals to modify their driving habits (VMT) and consumption of gasoline. All other counties have met their CARB goals, except Madera and Merced. Madera should coordinate and follow plans with counties such as Sonoma County to meet and/or exceed CARB goals to ensure a greater quality of life rather than failed non-attainment with its Hybrid plans. Moreover, the Hybrid plan fails to comprehensively consider appropriate county infrastructure of good jobs, fire, police, sanitation, water and roads in future planned development areas. The plan fails to show how the County will strive to increase earnings within the community to decrease expenditures outside the community.

#A

Furthermore, the plan is inadequate to protect our life-sustaining ecosystems including water and air in light of three years of drought, warming temperatures and unfortunate air quality. It seems there is a complete disregard of the science of clean air, water and ecological planning. Because the MCTC Hybrid plans half-hazardously convert farm land to mixed-use/residential land in Southeastern Madera county, it increases suburban subdivisions sprawling outward close to our most precious natural resources such as the Sierra Nevada Mountains, the San Joaquin River and our valley's lakes instead of close to the city and as infill and upward development. The plan puts more pressure on these natural resources which will further exacerbate air pollution and ground and surface water shortages, particularly with older homes such as in the Madera Ranchos area. So for the above reasons, even the best Hybrid Scenario plan is too hazardous for the people, animals, farms, land, air and water we depend upon because of the unlimited pollution and sprawl development in southeastern county. The long-term future and economic gains of Madera County and our natural resources are at too great a risk because of a lack of adherence to concentrate development with higher densities in the city and or infill areas and instead will lead to sprawl costing residents more for less with the current 2014 RTP plans.

#B

Respectfully,
Carla J. Neal

Dear Madera County Transportation Commission,

June 25, 2014

In Appendix A final Draft of the RTP/SCS Evaluation Criteria chart, which describes qualitative and quantitative project evaluation criteria for recommended projects of which project # 1-# 14 are shared in the Project Evaluation Results, it is not stated how many total points each of the 14 projects were awarded by each criteria. The Project Evaluation Results Chart ranks the evaluation of projects as # 1-14 and gives the descriptions of the projects and estimated costs. The evaluation process prioritizes the ranking of those projects as #1-14 out of the over 50 candidate regional transportation capacity-increasing projects and other modal projects that were analyzed, yet it does not say how many points each project received in total, nor for each criteria such as per trip served/cost of project, improved level of service, improves air quality, is environmentally sensitive, serves a major employment center, and the other criteria listed. Furthermore, projects are recommended by which projects should be done soonest or first based upon identified criteria of which the most points are given for LOS or Level of Service/less congestion projects (i.e: road expansion and more cars assumes less idling and stops) --whereas less congestion or (less cars overall) projects would assume scores less points (mass transportation or alternative modes of transportation projects). The criterion created directly prioritizes single passenger cars with future projects consistently throughout all 14 recommended projects only. This is consistent with the statement found in the Project Prioritization Criteria statement pg. 5-5 “ **Based upon comments received from the Roundtable, the criteria was revised and applied to evaluate the street and highway capacity increasing projects.** “ Creating a Sustainable Future for the next 20+ years should be more than a determination of how well a street and a highway perform. It is contradictory to state in the summary EIR that transportation Funding should shift from passenger cars to other modes of transportation and then expect that all future awarded Federal, State and Local tax dollars on ranked #1-#14 priority projects are designed to increase single car modes of transportation.

The criteria to give the most points to LOS projects(congestion lessening or road widening projects) specifically is inconsistent with the financial goals stated in the summary of the EIR on pg. 1-47 which states that “Transit Funding: Local jurisdictions can and should prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, including: Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic; Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.”. The revised criteria favors the usage of the car in new growth areas in Southeastern Madera county where the largest of the 14 projects are planned (project # 2, 3 and #5 totaling over \$150,000,000) and this is a direct result as to why the RTP/SCS proposal fails to meet its GHG reductions and is an unacceptable way to sustain Madera County in light of Climate Change. If local jurisdictions "can and should" meet transit funding goals as stated above, then MCTC can and should do this as well for a better future for the people of Madera County.

Best Regards,

Carla J. Neal

From: diane.b.merrill@comcast.net [<mailto:diane.b.merrill@comcast.net>]

Sent: Thursday, June 26, 2014 5:02 PM

To: Dylan Stone

Subject: Madera County Transportation Commission Draft RTP/SCS Environmental Impact Report

Attention:Madera County Transportation Commission

Re: Madera County Transportation Commission Draft Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) Environmental Impact Report

It is my understanding that San Joaquin Valley counties need to reduce per-person vehicle miles traveled (VMT) by 5% by 2020 and by 10% by 2035 to meet SB 375 to meet greenhouse gas (GHG) emissions targets.

A reduction in vehicle miles traveled will also serve to reduce ozone causing emissions and in this region of the San Joaquin Valley Regional Air Pollution Control District (SJVRAPCD), which is prone ozone pollution.

The RTP/SCS does not adequately address GHG reduction. This document should be revised to:

- Incorporate additional measures to provide public transit and to increase bicycle and pedestrian-friendly alternatives to driving.
- Address urban sprawl by encouraging new housing to be built within existing cities, rather than developing new communities in rural areas.

I urge you to have staff revise the EIR to address these deficiencies.

Respectfully submitted,

Diane Merrill

From: leonecisne@comcast.net [mailto:leonecisne@comcast.net]

Sent: Thursday, June 26, 2014 1:41 PM

To: Dylan Stone

Cc: data nations; Reyes, Margarita; Sanchez, Presentación; Cisneros, Rene; Leone, Beti; Jay Hubbell

Subject: Madera Cty. Sustainable Communities Strategy (SCS) - public comment

Madera County Commissioners

Attn: Madera County SCS: Invitation for Public Comment

Dear Madera County Commissioners:

I am a resident of Fresno County, but I often am in Madera County for a variety of reasons: to visit colleagues, to visit the Children's Hospital of Central California, to attend professional meetings, just to name a few.

I also am a relatively new Fresnan, having moved to California in the late 1990's, when I immediately enrolled in a biology class at Fresno City College, so that I could transfer my teaching credential from another state. (I needed to take this class.) When I first arrived about 15 years ago, I was always astounded that whenever I would ask about water (when in a social setting in Fresno), it seemed that no one wanted to talk about water. What a surprise to me that no one wanted to talk about water, given that everyone knows that this area does not have a high rainfall. (I knew this before I decided to move to this area.)

So, I was motivated to take this FCC biology class and I enjoyed it very much. I learned a lot about the biology of the San Joaquin Valley (especially the plants, the weather, and native desert animals) and one of many things I learned is that this area is a semi-desert and this is due to the lack of rain. And this gets to my point about your SCS, which will soon be the worst Sustainable Communities Strategy results in the entire state -- hurting our economic competitiveness and quality of life.

The big question: Why do we say that the strategy will hurt our economic competitiveness and quality of life? Why is this so? Is it just my opinion? No. Is there scientific proof that this is so? Yes, there is.

So, why will these be the worst Sustainable Communities Strategy (SCS) results in the entire state? You deserve an explanation and I will tell you 7 reasons for this conclusion I have made about your county's SCS:

1. Misses the SB 375 targets. The draft Madera Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) would be the first plan in the state to miss its greenhouse gas (GHG) reduction targets under Senate Bill 375.

#A

2. Increases pollution! Wow! Not only would your plan not reduce climate pollution; it would actually *increase* per capita greenhouse gas emissions by 9% by 2040. Nine percent is A LOT MORE POLLUTION -- and it affects Fresno, and the entire San Joaquin Valley, not just Madera.

#B

3. Other rural regions MUCH better! Why? Other rural regions achieve much better results. For example, the Tahoe region would reduce per capita GHG by over 7% by 2035. **Why is this?** One key reason for this failure by the Madera County planning commission is that Madera County is still planning New Towns, built on farmland, far from the City of Madera and existing employment centers.

#C

4. "Semi-desert" means limited water supply! I guess this is like learning BIOLOGY 101 all over again! Development means more strain on our existing--and finite--water supply. Water for new development will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation. This makes a lot of sense, doesn't it?

#D

5. Solutions: AVOID URBAN SPRAWL. So what do we need to do? It is really rather simple. We need to trim back on the appetite for urban sprawl and refocus housing development as "infill" within our city's boundaries. Is this so hard to plan? We have a beautiful countryside here in Central California though maybe many persons who live here don't realize it.

#E

6. Solutions: MORE MULTI-FAMILY HOUSING (50-50% or 65-35%). People need and want more multi-family housing than what is proposed in the plan. The plan is for a 75-25% mix of single-family to multi-

#F

family homes. We need more new multi-family housing and fewer new single-family houses. Try 50 - 50% (or even 65-35%) and you may be ahead of many urban areas in the country in accommodating the population you already have.

#F

7. Our / Your money (FUNDING) and a fine (?) REPUTATION! The last, but not least, reason is this: We cannot afford to have the worst performance of any region in the state. A poor Sustainable Communities Strategy will hurt state and federal grant funding, which is increasingly awarded on a competitive performance-oriented basis.

#G

In sum, there are many more reasons for you to do a better SCS for your county, but these seven (7) seem to take in all the other reasons and are the easiest for me to explain to you and, probably, for you to explain to those you must communicate with about the SCS plans you are considering.

So, my esteemed Madera County Commissioners, you know very well that we all (all of us) can do better than this, and we should do better than this.

Please ask your staff or the citizens like myself, Fresno-Madera area Sierra Club members, and others who are interested to participate in a better scenario. Please ask us or them to develop a scenario that meets the greenhouse gas reduction targets for consideration by the board.

#H

Sincerely,

Dr. Elizabeth Leone

Elizabeth Leone, Ph.D.
Writer / Educator / Applied Linguist
leonecisne@comcast.net
(559) 445 - 9135

cc: Mr. Gary Lasky, Conservation Chair, Sierra Club Tehipite Chapter, Fresno
cc: Mr. Presentación Sanchez, K-12 Teacher, Board Member, GPUSD
cc: Ms. Margarita Reyes, Attorney

cc: Dr. René Cisneros, Professor & Writer
cc: Mr. Jay Hubbell, Fresno County Democratic Club

From: joercorrea@comcast.net [<mailto:joercorrea@comcast.net>]
Sent: Thursday, June 26, 2014 1:13 PM
To: Dylan Stone
Cc: renedawnmom@gmail.com
Subject: RTP

DEAR Madera Commissioners--

I am constantly traveling down Highway 145, ave.12, ave. 9 and ave.7. These roads are constantly busy at certain times of the day and they can not sustain the traffic flow because of poor roads, one lane road and tractor usage. Now we are looking at RTP/SCS draft plan that cannot meet our state greenhouses gas reduction target. Yet I hear that there might be a Rock Quarry opening up on one of these road. This is unacceptable, there must be a plan that takes growth into consideration and meet the Senate Bill 375. Does Madera have to have the worst performance standard in the state because we did not think this out to better our county. I know we can and we should do better then this.

Thank you,
Joe R. Correa

From: Lloyd Carter [<mailto:lcarter0i@comcast.net>]
Sent: Thursday, June 26, 2014 8:05 AM
To: Dylan Stone
Subject: Draft Environmental Impact Report on an improved Regional Transportation Plan

To: Madera County Transportation Commission (MCTC)

From: Lloyd Carter, California Save Our Streams Council

Dear Ladies and Gentlemen,

I represent a grassroots group based in North Fork (eastern Madera County) that focuses on rational water policy on a local level. I am concerned about the Draft Environmental Impact Report on an improved Regional Transportation Plan (RTP) and a Sustainable Communities Strategy (SCS) that the Madera County Transportation Commission recently released for public review.

Madera County is already water-stressed and unable to meet the water needs of agriculture, urban growth and urban sprawl. The proposed Madera plan would not reduce climate pollution and would actually increase per capita greenhouse gas emissions by 9 percent by 2040. Residents of the mountainous portion of Madera County (Oakhurst, North Fork, Bass Lake) are in fear of seeing their hard rock wells go dry this summer as demand continues to exceed supply. The foothills face the same calamity and one need only look at the chronic water shortages faced by the Madera Ranchos development to see more water shortage problems are ahead for the entire county.

Madera County continues to plan for "New Towns" without looking far enough into the future to be able to determine there is an adequate water supply not just for the next 20 years (the current standard) but for 100 years. Every big new subdivision takes water away from agriculture, the lifeblood of the Madera County economy.

Moreover, the draft Madera Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as written, would be the first plan in the state to miss its greenhouse gas (GHG) reduction targets under Senate Bill 375. Everyone knows the San Joaquin Valley has some of the worst air quality in the nation with one out of six children suffering asthma or other respiratory problems. More urban sprawl, which the draft plan would permit, will only worsen air quality conditions for Madera's children.

I thank you for the opportunity to comment.

Lloyd Carter

2863 Everglade Ave.

Clovis, CA 93619

Dear Madera Commissioners --

- Our region is poised to have the worst Sustainable Communities Strategy results in the entire state -- hurting our economic competitiveness and quality of life.
- The draft Madera Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) would be the first plan in the state to miss its greenhouse gas (GHG) reduction targets under Senate Bill 375.
- Not only would our plan not reduce climate pollution; it would actually *increase* per capita greenhouse gas emissions by 9% by 2040.
- Other rural regions achieve much better results. For example, the Tahoe region would reduce per capita GHG by over 7% by 2035.
- One key reason for this failure is that Madera County is still planning New Towns, built on farmland, far from the City of Madera and existing employment centers.
- Development means more strain on our existing--and finite--water supply. Water for new development will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation.
- We need to trim back on the appetite for urban sprawl and refocus housing development as "infill" within our city's boundaries.
- People need and want more multi-family housing than is proposed in the plan. The plan is for a 75-25% mix of single-family to multi-family homes. We need more new multi-family housing and fewer new single-family houses.
- We cannot afford to have the worst performance of any region in the state. A poor Sustainable Communities Strategy will hurt state and federal grant funding, which is increasingly awarded on a competitive performance-oriented basis.

We can do better than this, and we should. Please ask staff to develop a scenario that meets the greenhouse gas reduction targets for consideration by the board.

Thank you for your involvement in the future of Madera county.



Carey Wilson <renedawnmom@gmail.com>

RTP

joercorrea@comcast.net <joercorrea@comcast.net>
To: dylan@maderactc.org
Cc: reneawnmom@gmail.com

Thu, Jun 26, 2014 at 1:12 PM

DEAR Madera Commissioners--

I am constantly traveling down Highway 145, ave.12, ave. 9 and ave.7. These roads are constantly busy at certain times of the day and they can not sustain the traffic flow because of poor roads, one lane road and tractor usage. Now we are looking at RTP/SCS draft plan that cannot meet our state greenhouses gas reduction target. Yet I hear that there might be a Rock Quarry opening up on one of these road. This is unacceptable, there must be a plan that takes growth into consideration and meet the Senate Bill 375. Does Madera have to have the worst performance standard in the state because we did not think this out to better our county. I know we can and we should do better then this.

Thank you,
Joe R. Correa

June 26TH 2014

Dear Madera Commissioner:

RE: Draft Environmental Impact Report

Our region is poised to have the worst Sustainable Communities Strategy results in the entire state, hurting our economic competitiveness and quality of life.

Other rural regions achieve much better results. For example, the Tahoe region would reduce per capita Greenhouse gases by over 7% by 2035.

One of the key failures is that Madera County is still planning New Towns, built on farmland, far from the City of Madera and existing employment centers.

Developments mean more strain on our existing and finite water supply.

But let's get back to our air quality issues. This draft would actually increase per capita greenhouse gas emissions by 9% by 2040. This prevents us from competing for state and federal grant funding, which is increasingly awarded on a competitive performance oriented basis.

We can do better than this and we should. Please ask staff to develop a scenario that meets the GHG reduction targets for consideration by the board. Don't let Madera be the lead in failure but reflect the care and concern for our quality of life and for our future generations.

Thank you,


Cathleen Wilson

June 26TH 2014

Dear Madera Commissioner:

RE: Draft Environmental Impact Report

According to the public survey you had on your website the most important goals of Madera development included clean air and conserve water. However, it appears that the current Draft Environmental Impact Report does not take this into consideration.

Case and point, not only is this draft the first plan in the state to miss its greenhouse gas (GHG) reduction targets under Senate Bill 375, it would actually increase per capita GHG emissions by 9% by 2035. As Madera County continues to plan New Towns built on farmland, far from the City of Madera and existing employment centers, instead of pursuing the Madera County's resident's interest of promoting infill, the opposite of urban sprawling.

This draft further means more strain on our existing and finite water supply. Water for new developments comes from our limited groundwater supplies or from water that is earmarked today for farm irrigation.

We cannot afford to have the worst performance of any region in the state. A poor Sustainable Communities Strategy will hurt state and federal grant funding, which is increasingly awarded on a competitive performance-oriented basis. I understand incoming monies are of significant interest to the leadership of Madera County.

We can do better than this and we should. Please ask staff to develop a scenario that meets the GHG reduction targets for consideration by the board. Don't let Madera be the lead in failure but reflect the care and concern for our quality of life and for our future generations.

Thank you,

Williams
Madera County Resident

June 26th, 2014

Dear Madera Commissioners:

It has been brought to my attention that your Draft Environmental Impact Report on the Sustainable Community Strategy and Regional Transportation Plan falls short of meeting California's targets to reduce air pollution of Greenhouse Gases. I also have been informed you are developing an Alternative Strategy Plan that will again not meet these goals.

According to the Madera County Transportation Commission website, you are aware that the residents of Madera County have requested these goals for Madera's future:

- Less driving overall
- Safer access to schools
- Maintain and fix roadways
- Make public transit better
- Conserve agricultural land and open space
- Clean air
- Conserve water
- Promote infill –the opposite of urban sprawl

Not only are you proposing to not meet these goals but in fact are planning to increase per capita greenhouse gas emissions by 9% by 2040.

Development means more strain on our existing and finite water supply. Water for new development will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation.

We cannot afford to have the worst performance of any region in the state. A poor SCS will hurt state and federal grant funding, which is increasingly awarded on a competitive performance oriented basis

We can do better than this and we should. Please ask staff to develop a scenario that meets the greenhouse gas reduction targets for consideration by the board.

Thank you,


Madera County resident

June 26th, 2014

Dear Madera Commissioners:

According to our recent Madera County Survey, those of us that responded, requested a Sustainable Community Strategy and Regional Transportation Plan that would include:

- Less Driving overall
- Safer access to schools
- Maintain and fix roadways
- Make public transit better
- Conserve agricultural land and open space
- Clean air
- Conserve water
- Promote infill not urban sprawl

The current Draft Impact Report on the table does not meet these goals and in fact does the opposite, by increasing our air pollution.

Please do not make our county the only county in California to not succeed in meeting our greenhouse gases reduction targets. Please ask staff to develop a scenario that meets the GHG reduction targets for consideration by the board.

Thank you,

Shayne Reed
Madera County Resident

June 26th, 2014

Dear Madera Commissioners:

It has been brought to my attention that your Draft Environmental Impact Report on the Sustainable Community Strategy and Regional Transportation Plan falls short of meeting California's targets to reduce air pollution of Greenhouse Gases. I also have been informed you are developing an Alternative Strategy Plan that will again not meet these goals.

According to the Madera County Transportation Commission website, you are aware that the residents of Madera County have requested these goals for Madera's future:

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- Make public transit better
- Conserve agricultural land and open space
- Clean air
- Conserve water
- Promote infill –the opposite of urban sprawl

Not only are you proposing to not meet these goals but in fact are planning to increase our air pollution.

We cannot afford to have the worst performance of any region in the state. A poor SCS will hurt state and federal grant funding, which is increasingly awarded on a competitive performance oriented basis.

We can do better than this and we should. Please ask staff to develop a scenario that meets the greenhouse gas reduction targets for consideration by the board.

Thank you


Madera Resident (County)

June 25, 2014

Dear Madera Commissioners:

You claim to have Madera County and its residents in your best interest, however, clearly you do not.

As not only does your draft Madera Regional Transportation plan/Sustainable Communities Strategy fail to reduce our climate pollution, it would actually increase per capita greenhouse gas emissions by 9% by 2040. Additionally, it would be the first plan in the state to miss its GHG reduction targets under SB 375.

1. Its mind boggling that Madera County Commission wants to be known statewide as the only county not only to fail at meeting targets but
2. To increase the air pollution pumped into our atmosphere

We cannot afford to have the worst performance of any region in the state. A poor SCS, or since my county has decided they are not interested in an appropriate SCS, but instead has plans to come up with a poor performing APS that will hurt state and federal grant funding. This county should instead pursue compliance appropriately and compete for this state federal grant funding which is increasingly awarded only on a performance oriented basis.

Treat Madera County and its residents as if this is a county you want to live in and raise your family in.

Madera County is not a drive through or a temporary buck for you to make off with. It is my beautiful home, destination and treasure. Worthy of respect, care and nurturing, not polluting.

Thank you,


County Resident

June 25, 2014

Dear Madera Commissioners:

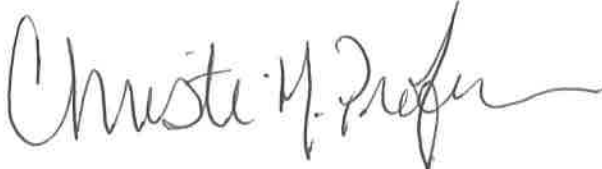
Problem: Our region is set to have the worst Sustainable Communities Strategy results in the entire state. This would hurt our economic competitiveness and quality of life. This is due to your current draft of Madera RTP/SCS being the first plan in the state to miss its GHG reduction targets under Senate Bill 375.

I can't help but wonder why the commission would want such notoriety. And the opposite is possible because as Madera is the only non-cooperating county in focusing on goals of achievement of meeting these targets, other counties are working on beating the targets with even higher performances. For instance, considering Tahoe region's plan will reduce per capita GHG by over 7% by 2035.

We cannot afford to have the worst performance of any region in the state. A poor SCS will hurt state and federal grant funding, which is increasingly awarded on a competitive performance oriented basis. Which of course is an opportunity to bring revenue into our county.

We can do better than this, and we should. Please ask staff to develop a scenario that meets the greenhouse gas reduction targets for consideration by the board.

Thank you for protecting Madera County


County Resident

Wednesday, June 25th, 2014

Good Evening Madera Commissioners:

Well, I have received some very disturbing news. You folks have decided Madera and its residents do not deserve an appropriate and compliant RTP/SCS. Yes, I know what that means. And I know how embarrassed I am that you folks do not think that I, a property tax payer deserves clean air and water.

Your DEIR does nothing to stop the developers that are putting more strain on our existing and finite water supply. Water for new developments will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation.

We must trim back on the urban sprawl epidemic in our county, refocusing housing developments as "infill" within our city's boundaries.

It's only rocket science in trying to understand why I am opposed to your willingness to fail if all you are focused on is a few temporary bucks of revenue instead of the big picture of the sustainability of Madera County.

You have been granted a responsibility and privilege to lead our county. Please lead our county our county into a brighter quality of life and economic competitiveness instead of down a path of environmental and social failure. Seriously consider if you want to live, eat and breathe in a county that does not put its efforts into meeting the GHG goals. A better scenario can serve all purposes instead of settling for failure.

Thank you


Resident Madera County 13 years

6/25/2014

Madera County Transportation Commission

Dear Madera Commissioners,

While I acknowledge you have a lovely website, I must share my frustration with your contradictory statements.

Madera County GHG Targets

In 2011, the CARB issued a 5% reduction target to each of the eight (8) Metropolitan Planning Organizations (MPOs) in the San Joaquin Valley including MCTC. CARB agreed that the targets would be applicable to each MPO independently of other Valley MPOs. The targets included a percentage reduction of greenhouse gas emissions from 2005 of 5% by the year 2020 and a reduction in GHG emissions of 10% by the year 2035. Developing the SCS requires meaningful collaboration with each of the local agencies, as well as stakeholders to identify land use and transportation planning opportunities around the region that will address the needs of the growing population and ensure compliance with State and Federal requirements.

Measure T funds are to assist in the above goal, the website claims of enhancements to Madera Transportation system, specifically bike paths and buses, yet in SE Madera County this is not visible to be polite about its nonexistence.

But yet what is visible is this county's pursuance of every action possible to promote urban sprawl. Bowing to projects that increase VMT's thereby increasing our county's GHG emissions. A direct contradiction to the intent and purpose of CEQA and SB 375.

What is more shameful is the significant disregard the MCTC has on this issue.

It does pose a question as to the Commission's commitment to this county and the residents, including the children that live, run and play in Madera County under the supervision of those that are not interested in their health by ignoring the advocacy for clean air.

Please take careful consideration before you through the residents of Madera County into a future of dirty air, increased health risks, and setting a new standard of lowness on the scale of hurting our quality of life.


County residents

From: Robert Merrill [<mailto:geolbob@yahoo.com>]
Sent: Thursday, June 26, 2014 12:03 PM
To: Dylan Stone
Subject: Madera County Draft Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS)

June 26, 2014

Attention Madera County Transportation Commission:

It is important that you consider the financial and environmental consequences of poor planning as currently included in the County's Regional Transportation Plan (RTP) and the Sustainable Communities Strategy (SCS).

By expanding rural subdivisions far from the Cities of Madera and Fresno, you will be further negatively impacting air quality and increasing greenhouse gas emissions in an already overburdened air basin. You would do better to plan housing close to the City of Madera rather than in more remote rural areas.

Allowing increased rural residential subdivision expansion in the highway 41 corridor will only worsen the groundwater overdraft in that area. Surely you have talked with the residents in Madera Ranchos and understand that many of them have had to deepen wells as the water table has dropped. This water supply is fixed and limited, and only worsens further east toward the foothills. Failure to consider the long term viability of a water supply to subdivision development in that area, could leave the County of Madera vulnerable to lawsuits by homeowners when they learn that County decisions approving development in areas with a very limited water supply are responsible for their lack of water.

Please take these considerations into account when developing any Environmental Impact Reports for regions in the vicinity of Madera Ranchos and especially areas further east in Madera County.

Sincerely,
Robert D. Merrill, Emeritus Professor of Geology

Patricia Taylor, Deputy Director
 Madera County Transportation Commission
 2001 Howard Road, Suite 201
 Madera, CA 93637
 Submitted via email to: patricia@maderactc.org

June 26, 2014

RE: Draft 2014 Regional Transportation Plan and Sustainable Communities Strategy (RTP & SCS) and associated Draft Program Environmental Impact Report (dPEIR)

Dear Madera County Transportation Commissioners:

We are writing to comment on the Program Environmental Impact Report (PEIR) for the 2014 Regional Transportation Plan / Sustainable Communities Strategy (RTP / SCS). We congratulate the Madera County Transportation Commission (MCTC) on developing its first draft Sustainable Communities Strategy (SCS) under California Senate Bill 375 (SB 375). We write as a diverse cohort of organizations, many of which have participated in the Madera RTP / SCS process over the past several years.

This plan offers the opportunity to make Madera County more healthy and sustainable, with greater economic opportunity for all of its residents. We thank you for the many ways that this plan acknowledges the essential need to integrate land use and transportation planning. It identifies the important benefits it could have in increasing public health and economic opportunity for residents of all incomes, and in protecting our natural resources and farmland.

However, we are concerned that the plan fails to live up to its ambitious goals. As we explain below, we encourage MCTC to expand its analysis of the following issues. We believe that MCTC should adopt an improved scenario and add additional policies that will:

- meet the SB 375 greenhouse reduction targets
- prioritize investment in existing communities throughout Madera County
- meet the housing market demand for more compact and affordable housing types
- invest more in creating walkable and transit-oriented or transit-ready neighborhoods
- meet the needs of disadvantaged communities and improve public health
- protect the county's water quality, water supply, farmland, and natural resources

I. Meet the SB 375 greenhouse reduction targets

This plan represents MCTC's first RTP under a new state law, Senate Bill 375 (SB 375), designed to reduce the greenhouse gases (GHG) caused by personal vehicles. Like other San Joaquin Valley Councils of Governments, Madera received a target to reduce per capita GHG by 5% by 2020 and 10% by 2035, as compared to a 2005 base year.¹ Unfortunately, this plan has the worst GHG result of any Sustainable Communities Strategy (SCS) yet adopted in the entire state. The plan will not only miss its SB 375 GHG reduction targets but *increase* per capita GHG by +13.7% (2020) and +9.1% (2035). It is the only region whose SCS will increase per capita GHG and only one of two that will miss its targets.

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¹ Note that the dPEIR erroneously states that targets are 5% for 2005 and 10% for 2020 (p. 3-161).

The RTP attributes this to the fact that Madera is “two counties in one” and has significant rural / foothill development. Yet almost every region in the state has two or more distinct geographic areas, and many regions have significant rural / foothill populations – including Butte, Shasta, and Tahoe, as well as other counties in the Valley like Fresno and Tulare – all of whose plans have substantially better performance. Because an increasing number of state and federal funds are allocated competitively to reward the best-performing plans, underperforming so significantly could result in Madera receiving less of the infrastructure and planning dollars that it so critically needs.

We respectfully request that MCTC ask its staff to revise the scenario and transportation project list to create a Regional Transportation Plan that meets the greenhouse gas targets. The suggestions that follow throughout this letter could contribute to improving the plan’s GHG performance.

We applaud MCTC for its proposal to create a SCS Funding Program to reduce GHG emissions. For this to mitigate this plan’s climate impacts, we suggest that the plan and EIR further define the grant program by identifying when it would begin, how much funding it would provide, and how it would reduce GHGs. We believe it could best reduce GHGs by promoting development within existing communities that makes these communities more walkable and transit-served, ensuring homes in such communities are affordable to households at all income levels, and protecting natural landscapes and farmland.

Finally, because MCTC rightly points to the importance of local policies, we would suggest that MCTC identify several specific actions (beyond the planned educational forum) by which it can support local agencies in successfully reducing regional GHGs, such as compiling best practices or commenting on local general plans.

II. Prioritize investment in existing communities throughout Madera County

Madera County is currently home to about 150,000 people. By 2040, that number will grow to over 265,000. Madera CTC plays a critical role in determining where and how this growth will occur. It will invest billions of dollars by 2040, investments that will have a large impact on where and how development occurs and how future residents travel. This could strengthen existing communities, making them more walkable and healthy places to live while protect the natural areas that make Madera County unique.

Unfortunately, this plan directs significant investment into new growth areas. In creating a Sustainable Communities Strategy, every scenario systematically prioritized growth in the Southeast Madera County New Growth Area (NGA), assuming that it was one of the most attractive locations for new development (Table 6-1). To support this growth, the plan will invest nearly a quarter of a billion dollars in the Southeast New Growth Area, nearly one-fifth of the entire regional transportation budget. Rather than using the county’s limited resources to strengthen existing communities, this plan invests in new towns that will drain economic activity away from the cities of Madera, Chowchilla and other existing communities such as Madera Ranchos, Fairmead, Raymond, Oakhurst and Coarsegold.

Instead, we suggest that MCTC prioritize supporting growth within existing cities, towns, and rural communities. MCTC should create a revised scenario that reduces the amount of growth projected in the Rio Mesa / New Growth Area and increases the amount of growth that occurs in existing neighborhoods and downtowns. Delaying or eliminating the major investments in the Rio Mesa area and redirecting those funds to existing communities could improve this plan’s benefits for Madera’s

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residents as well as its environmental performance. We also request that MCTC revise its project selection criteria, giving more weight to projects that support RTP / SCS principles and adding specific criteria that reward projects within existing communities.

III. Meet the housing market demand for more compact and affordable housing types

Recently, a major study conducted for the San Joaquin Valley Blueprint implementation process analyzed housing market trends and future demand in the San Joaquin Valley, particularly for higher-density housing types such as townhomes and apartments. It concluded that “the region has historically under-delivered higher density housing, particularly for renter households” and that it was essential to meet this demand to maximize the region’s growth potential.² It also emphasized that this applied not just to cities like Bakersfield and Fresno but equally to the Valley’s smaller communities.

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Unfortunately, the SCS scenario in this plan would not meet market demand for townhomes and apartments. From 2010-2040, under the housing demand that is economically viable to meet in Madera County, 36% of homes would be multifamily.³ In contrast, under the selected scenario, only 25% of homes would be multifamily (Table 6-6). Not planning to meet this demand keeps Madera from living up to its growth potential. It risks having rents and home prices be higher than they should be. Planning to underbuild the more affordable housing types also puts Madera at risk of not meeting its obligations to provide housing choices for families at all economic segments.

As a result, this scenario is also lower density. The average residential density of new growth would be 3.3 dwelling units per acre (Table 6-6). In the San Joaquin Valley Blueprint, the preferred scenario, which was selected following significant public outreach in Madera, committed that new growth in Madera County would have an average density of 4.7 dwelling units per acre.⁴ When growth is low-density, residents have no choice but to travel via automobile, contributing to air and water pollution, worse public health outcomes, climate emissions, and higher transportation costs.

Promoting a good fit between housing costs and job wages is crucial to creating walkable neighborhoods and reducing the length of automobile trips. Merely balancing the number of jobs and homes could result in a mismatch where lower-income workers commute in to service jobs in higher-income neighborhoods, while those residents commute out.

We respectfully request that Madera revise this scenario to (a) meet market demand for townhomes and apartments and (b) achieve the density of the preferred Blueprint scenario. We also encourage MCTC to promote compact growth and home affordability via the SCS Funding Program. Finally, we request that MCTC commit to developing a jobs-housing fit metric for use in its next RTP.

² Market Demand Analyses for Higher Density Housing in the San Joaquin Valley. Final Report. June 22, 2012. Concorde Group. http://www.valleyblueprint.org/files/SJV%20Demand%20Final%20Report%206.22.12_3.pdf. Last accessed 6/23/2014. p. 3

³ Ibid. p. 5.

⁴ San Joaquin Valley Blueprint Planning Process: Summary Report. September 2010. http://valleyblueprintorg.alias.strangecode.com/files/SJVBR_Summary_Final_2010-09-22.pdf. p. 37.

IV. Invest more in creating walkable and transit-oriented or transit-ready neighborhoods

Walkable and transit-oriented neighborhoods have many benefits. They create activity nodes where commercial activity flourishes. By making non-auto travel convenient, they reduce air pollution and increase physical activity. They can also create a unique sense of place that provides a competitive edge to regions seeking to attract or retain workers and entrepreneurs. In this RTP, MCTC has the opportunity to invest in existing communities with a focus on creating walkable neighborhoods, hubs or corridors to be connected by transit.

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We appreciate the support provided in this plan for transit, vanpools, active transportation, and safe routes to schools. Unfortunately, although this plan takes some steps toward receiving the benefits of a shift toward a multi-modal transportation network, its transportation investments unfortunately still prioritize automobile travel and improving “Level of Service.” This facilitates a sprawling land use growth pattern that makes non-car travel difficult, ultimately leading to a significant rise in vehicle miles traveled. In this plan, only 13% of new homes would be within ½ mile of a transit stop (Table 6-6). The plan would spend significant funds facilitating growth in the Rio Mesa and Ranchos areas.

Madera is spending a significantly greater proportion of its funds expanding streets and roads than in transit, bike-ped infrastructure, and streetscapes within existing communities. Overall, the plan would spend 54% of its funds for projects that widen or increase street capacity. By comparison, that figure is 39% in Fresno County and 30% in San Joaquin County. The results are clear (Table 6-6). The plan has *fewer* transit, bicycle, and walking trips than the status quo. The average work trip is longer. The amount of miles driven in congested traffic rises by more than 10 percent.

Instead, Madera should create a scenario where a significant increase in transit funding and funding for attractive, safe streetscapes for walking and biking attracts new development to walkable, bikable, transit-oriented (or transit-ready) neighborhoods in existing communities. These hubs could provide transit service to Fresno and other destinations in a way that significantly reduces GHG. It should also move quickly to implement the grant program it outlines, ensuring that it helps existing communities – particularly the most disadvantaged – become more walkable, bikable, and transit-oriented.

V. Meet the needs of disadvantaged communities and improve public health

Environmental justice is a critical issue throughout the San Joaquin Valley. Low-income and minority households have greater difficulty accessing the transportation they need to travel to employment and educational opportunities, and pollution burdens are also often greatest in areas with higher socioeconomic vulnerability. The results can be quite serious. In the lowest-income zip codes of the San Joaquin Valley, the rate of premature death is nearly twice that in the highest-income zip codes, and life expectancy variation by zip code differs by over 20 years.⁵

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Given the severity of this issue, a great deal of research has been done to inform policymakers. The U.C. Davis Center for Regional Change mapped areas of social vulnerability⁶ then identified where those intersect with environmental hazards to identify Cumulative Environmental Vulnerability Action Zones

⁵ Place Matters for Health in the San Joaquin Valley: Ensuring Opportunities for Good Health for All. A Report on Health Inequities in the San Joaquin Valley. Joint Center for Political and Economic Studies. March 2012.

⁶ These maps present a composite of a number of risk factors and are available at http://mappingregionalchange.ucdavis.edu/sites/default/files/MADERA_SV_index_Maps.pdf.

(CEVAZ) – several of which are in Madera.⁷ In addition, longstanding rural unincorporated communities have severe infrastructure deficits that impact health and well-being.⁸ Fairmead Community and Friends from the community of Fairmead, located between the cities of Madera and Chowchilla, have for many years advocated for much needed improvements in their community such as safe routes to school, curb and gutter, paved roads, improved public transit, and opportunities for affordable housing. This process/plan represents a unique opportunity to invest in communities such as Fairmead and to prioritize those needs prior to investing in places like Rio Mesa.

Regional Transportation Plans must carefully attend to the needs of disadvantaged communities and ensuring that they are fairly treated.⁹ This plan can and should go much further in seeking out underserved communities and environmental justice areas, identifying and considering transportation needs of those communities, and ensuring that the proposed regional growth and transportation network provides equitable benefits and does not overly burden them.

The attached memo from UC Davis’s Center for Regional Change outlines best practices in an equity analysis and the shortfalls in this plan. For example, it provides “no details about the magnitude of investments or per-capita investment comparisons for EJ vs. non-EJ groups,” making it a discussion that is “not sufficient for demonstrating whether disproportionate environmental justice impacts of investments will occur.” It seems difficult to imagine that EJ groups would benefit equally, given the significant investments occurring in non-EJ communities.

Further, the plan may well cause significant burdens to sensitive receptors, low-income communities, and communities of color. Under the plan, an additional 4000 homes would be built within 1000 feet of a highway or major roadway, as compared to the status quo (Table 6-6). In the City of Madera, several Cumulative Environmental Vulnerability Action Zones exist adjacent to State Route 99,¹⁰ and under this plan, vehicle miles traveled on SR-99 would increase by over 50%, causing diesel particulate matter to rise by nearly one-quarter (dPEIR Table 3-40). Even if the transportation improvement projects themselves are located throughout the county, as the dPEIR suggests, the operation of these projects may still result in concentrated impacts on vulnerable populations. The finding of no significant impacts on minority and low-income populations (Impact 3.16.1 and 3.16.2) appears unfounded and erroneous, and the decision in Impact 3.4.4 to leave all mitigation to implementing agencies rather than use MCTC’s control of the region’s transportation budget to mitigate health impacts appears inadequate.

The RTP / SCS and dPEIR suggest that these projects’ benefits might offset their impacts, as they are “intended to” reduce congestion (RTP / SCS p. 10-14, dPEIR p. 3-372). Unfortunately, in fact, the hybrid scenario *increases* congested vehicle miles traveled by over 10% as compared to the status quo (Table 6-6). The UC Davis memo points out that “the evaluation [of congestion] lacks detail” and that “the assumption that projects will only lead to long term air quality improvements is not well demonstrated,

⁷ Land of Risk, Land of Opportunity: Cumulative Environmental Vulnerabilities in California’s San Joaquin Valley. Nov. 2011. UC Davis Center for Regional Change. Jonathan London Ph.D., Ganlin Huang Ph.D., & Tara Zagofsky M.S.

⁸ Smart Growth in Rural California. 2013. Leadership Counsel for Justice & Accountability. Phoebe Seaton, Veronica Garibay and Anne Bellows. http://media.wix.com/ugd/53e872_55535b452dd1f5c36ff6dea513145d8e.pdf

⁹ Among other requirements, an RTP must comply with Title VI, prohibiting discrimination on the basis of race, color or national origin. MCTC must also adopt a public participation plan to “seek out and consider the needs of those traditionally under-served by existing transportation systems, such as low-income and minority households” 23 C.F.R. § 450.316 (a) (1) (vii) and “periodically review the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.” 23 C.F.R. § 450.316 (a) (1) (x).

¹⁰ Land of Risk, Land of Opportunity. Figure 3.

as capacity increases can lead to greater air quality impacts for adjacent communities in the long run (as overall travel along a road increases due to induced demand).” While certain projects may benefit disadvantaged communities, e.g., by increasing transit service, the plan as a whole risks placing disproportionate burdens on minority and low-income residents.

Before finalizing this plan, we request that you expand the equity analysis following the recommendations in the attached memo. In particular, please provide data showing which investments would serve areas (e.g., census block groups) that are historically underserved or have significant numbers of minority or low-income residents. If necessary, please modify the transportation project list to ensure that both urban and rural disadvantaged communities receive proportional investments that meet their transportation needs. We would also appreciate an expanded discussion of the health impacts of this plan. In particular, please expand the discussion of air quality impacts on residents living near major roadways, particularly low-income and minority residents, and please identify specific strategies for mitigating those health impacts.

Public health is an issue of growing concern for planners. We ask that MCTC follow FresnoCOG’s lead in conducting a Needs Assessment focused on the infrastructure gaps and health inequities, particularly in disadvantaged communities, in partnership with public health stakeholders. This needs assessment could then inform the priorities of the SCS Funding Program, as will occur in Fresno. We also ask that MCTC improve its ability to analyze its regional plans’ health impacts by beginning now the technical work necessary to incorporate additional health performance measures

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VI. Protect the county’s water quality, water supply, farmland, and natural resources

Madera County's valuable land and water resources provide a foundation for its economic prosperity. Unfortunately, when compared to the status quo, the hybrid scenario would consume approximately one-third more of our valuable natural "resource land" (Table 6-6) due to projected growth in Southeast Madera County. Inadequate regional coordination between Madera, the City of Fresno, and the County of Fresno creates conflicts in the timing and need for local infrastructure, and the lack of progress towards a Joint Study of Regional Traffic and a River Crossings Study diminish the viability of the data relied on for growth planning purposes. Locating a significant amount of growth near the San Joaquin River and other natural resource areas could significantly impact water supply and water quality. The impacts of Southeast Madera developments to water resources can include the degradation of existing groundwater and surface water supplies, and could drain our water resources away from existing uses, including farmers and existing homeowners.

The RTP and SCS plans rely on unrealistic and outdated data to assess transportation demands in the Rio Mesa and Southeast Madera County growth areas. Nearly 20 years after Rio Mesa Area Plan approvals, development proposals have proven to be challenged in securing adequate water supplies necessary to support the scale of development proposed. The plan fails to account for likely changes in projects attributable to these shortages in available water. After a series of legal rulings against the County, decisions by the Fifth District Appellate Court and the State Water Resources Board have made clear that the County's reliance on Holding Contracts as a water supply does not establish water rights for new development (SWRCB Complaint No.363:CAR:262.0 (20-15-01), Madera County Superior Court, Case No. MCV 062167, Stanislaus Superior Court Case No. 351003). Further, the reliance on groundwater in the Madera Basin has proven to be an unreliable source for new development as severely declining water tables already threaten existing well productivity, groundwater quality, and further land subsidence. The

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concept of a '1:1 groundwater balance' for new development has been included as a mitigation for several new project approvals, however, no project has shown that this balance is achievable given the overdraft conditions in the Madera Groundwater Basin and lack of access to Friant water for municipal supply (Madera County Superior Court, Case No. MCV 062167, Madera Co. Sup. Ct. No. MCV045352).

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cont.

We therefore suggest that MCTC revise the scenario and transportation project list with these concerns and questions in mind. This updated scenario should better reflect the barriers to development in Rio Mesa. With more realistic growth estimates and timeline, MCTC could reallocate or delay the significant transportation funds planned in southeast Madera to invest in existing communities and provide more transportation choices to Madera residents. In this revised scenario, MCTC should identify how its transportation funding could better foster growth in ways that protect farmland and natural resources.

We greatly support the suggestion that the MCTC Policy Board create a subcommittee where stakeholders can work collaboratively to provide recommendations on how to avoid, minimize, and mitigate the loss of agricultural land via the MCTC transportation planning process. Rather than consider this proposal after the RTP, we ask that it be approved as part of plan adoption and that its scope also include natural resource areas. We recommend that this Madera County committee work with Fresno County stakeholders. The Fresno Council of Governments has committed to creating a similar committee and has expressed interest in working with Madera County on the issue of working land and open space protection. This committee should also consider how the SCS Funding Program can help implement its identified strategies. Finally, we suggest that this plan include a clear policy statement of support for the conservation of farmland as a key element of a sustainable Madera County.

In conclusion, we want to thank you for your hard work on this plan to date and for your consideration of these suggestions. We look forward to working with you to implement them.

Sincerely,

Chris Acree, Executive Director
Revive the San Joaquin

Lourdes Herrera, Director,
Madera Coalition for Community Justice

Keith Bergthold , Executive Director
Fresno Metro Ministry

Gary Lasky, Conservation Chair and Legal Chair
Sierra Club Tehipite Chapter

Cesar Campos, Coordinator
Central California Environmental Justice Network

Rey León, Executive Director
San Joaquin Valley Latino Environmental
Advancement Project

Gavin Feiger, Senior Program Associate
Sierra Nevada Alliance

Marty Martinez, Northern California Policy Manager
Safe Routes to School National Partnership

Socorro Gaeta, Community Organizer
Latinos United for Clean Air

Dan O'Connell, San Joaquin Valley Program Manager
American Farmland Trust

Veronica Garibay, Co-Director
Leadership Counsel for Justice and Accountability

Lowell J. Young*
President, Yosemite Area Audubon Society
(* signing as an individual)

MEMORANDUM

To: Sierra Club Tehipite Chapter & coalition partners
FROM: Dana Rowangould, Center for Regional Change, UC Davis
DATE: June 24, 2014
RE: **Equity analysis in the 2014 Madera County SCS/RTP**

Overview

The Center for Regional Change at UC Davis has expertise in equity analysis and the development of equity metrics, in particular in California and the San Joaquin Valley.

The Center for Regional Change has reviewed the Madera County 2014 SCS/RTP and RTP DEIR environmental justice analysis. The RTP environmental justice chapter (Chapter 10):

- describes how transportation systems can affect communities;
- describes environmental justice (EJ) principles and guidance;
- describes the public involvement process;
- defines low-income and minority populations;
- defines five large geographic areas referred to as Target areas (these areas cover the entire county);
- describes the population and minority status of each Target area;
- maps areas within the target areas that have greater minority and low-income communities;
- qualitatively describes an analysis of the distribution of RTP investments by project type across target areas;
- qualitatively describes air quality impacts of the RTP.

However, the RTP analysis in Chapter 10 does not compare the outcomes of the RTP/SCS in EJ communities vs non-EJ communities¹. While the DEIR concludes that disproportionate impacts resulting from RTP/SCS implementation are not anticipated, it also does not provide any additional analysis of EJ impacts.

A robust environmental justice analysis should

1. be performed in consultation with environmental justice stakeholders
2. identify relevant costs and benefits
3. identify criteria used to determine disparities
4. identify environmental justice areas or populations and discuss the communities captured
5. present quantitative data that can be used to evaluate criteria

¹ Note that Table 6-6 of the RTP does provide comparisons of travel times and transit travel distances for EJ vs. All zones. However, the metrics differ from the outcomes identified in the environmental justice analysis presented in Chapter 10 (which focuses on expenditures and air quality) and they are not discussed or interpreted in the text. In several cases the appropriate interpretation of the metrics presented in Table 6-6 is unclear.

6. evaluate SCS scenario outcomes for the areas or populations identified above in terms of the criteria
7. discuss any potential for adverse impacts and potential alternatives or mitigations

In each case, the methodology, data, and logic used should be provided in sufficient detail to promote public understanding.

We discuss these recommendations in more detail below.

Consult with environmental justice stakeholders

Coordination with a wide range of traditionally underrepresented stakeholders is important for understanding environmental justice concerns across the region. On page 10-4, the RTP indicates that consultation with a number of different groups was instrumental to the RTP/SCS process. The appendices also provide detail about the public participation process, which include meetings conducted in Spanish. Chapter 8 further notes that two meetings were geared for environmental justice communities and that outreach included bike/ped representatives and Tribal Governments. We commend the MCTC for inclusion of these groups. However, the document does not mention inclusion of the social equity advocates, environmental advocates, or public health advocates. If such outreach was conducted it should be documented. If it was not, it should be conducted for subsequent regional planning efforts.

Identify relevant costs and benefits

Transportation systems can affect local air quality, opportunities for active travel, access to jobs and crucial services, neighborhood cohesion, and more. A sound environmental justice analysis should identify the impacts (costs and benefits of plan implementation) that are particularly relevant to Madera county residents in consultation with stakeholders. The environmental justice analysis should then be completed to capture those concerns as much as feasible.

The RTP focuses on the location of investments by project type and on air quality impacts. These are generally important, but their selection is not explained. The RTP/SCS should explicitly state the origins of the focus on these impacts, whether from community residents or planning staff.

Identify criteria used to determine disparities

Clear, explicit criteria for determining whether disparate impacts will result from plan implementation are absolutely vital to conduct a meaningful environmental justice analysis. Clear criteria for determining whether there are disparities for *each outcome* of interest should be presented. An example criterion might state that if a comparison of the share of benefits to the share of the population (EJ benefits vs. EJ

share of the population) shows that EJ communities benefit less than other groups, the plan would result in a disproportionate impact for a particular outcome. Additionally, a clear criterion for whether the entire RTP/SCS package results in disparities should be provided. Such a criterion might state that an evaluation of a specified list of outcomes results in fewer than some number of outcomes showing disparities, or it may rely on outcomes that are overarching in nature (e.g. disparities related to the overall RTP spending patterns or an inclusive cost/benefit analysis).

Page 10-6 of the RTP provides a general principle that could be used for the EJ analysis: “populations considered minority or low-income should have equal levels of benefit compared to other population groups.” The evaluation then focuses on comparisons of target areas (which comprise the entire county) rather than comparisons of EJ and non-EJ populations. The criteria would be more clear if specific EJ objectives and metrics that might be evaluated (per capita funds for EJ populations vs. non-EJ populations, air quality improvements for EJ vs. non EJ areas, travel time improvements for EJ populations vs. non EJ populations, etc.) were specified (and then evaluated, as discussed below).

Identify environmental justice areas or populations and discuss the communities captured

While the RTP includes a description of the location of minority and low-income areas within the Target areas, the analysis itself focuses on the Target areas, which comprise the entire county. The RTP indicates that an even distribution of funds among Target areas will mean that EJ impacts are acceptable. However, this logic is dubious because the Target areas include the entire county (not just EJ communities) and the analysis does not evaluate the distribution of impacts to EJ communities, and because examining distributions at a coarse level can mask more meaningful distributions within target areas.

Environmental justice evaluations of plans or projects generally rely on the identification of communities of concern, or specific geographic areas that contain relatively high proportions of low-income and/or minority residents. The RTP identifies EJ areas via the use of thresholds in the map in Figure 10-4, where poverty >20% and minority >70% are used to delineate EJ TAZs. Although Chapter 10 of the RTP does not provide an analysis of costs and benefits in these areas, traditionally, environmental justice analyses use the identified EJ areas to evaluate some outcomes (costs or benefits) and determine whether the outcomes vary in communities of concern versus the rest of the region or population as a whole.

Examining environmental justice areas can be a powerful way to identify geographic areas of concern, which allows for planners to identify areas of need where targeted investments may bring important improvements. However, the use of geographic areas to assess the distribution of benefits can be problematic if it does not distinguish between those who experience costs and benefits within those areas.

For example, road improvements benefit households with cars more than households without access to a vehicle, though both can reside in the same area. Additionally, the threshold used to identify areas can be problematic if it is not selected carefully. For example, using a relatively inclusive definition of EJ communities can obscure the impacts that occur in areas of higher concentrations of target populations.

In addition to using one threshold to identify EJ communities, there are several alternative ways to identify low-income and minority residents:

- a) **Evaluate a range of thresholds to identify communities of concern.** The use of several thresholds to identify communities of concern can illustrate impacts for areas of slightly elevated and greatly elevated concern. For example, in addition to the threshold used (as described above), it would be illustrative to examine areas that have greater numbers of minority and low-income residents. For each threshold used, it is helpful to see a breakdown of the demographics that are included in EJ areas vs. the demographics of non-EJ areas in order to understand how well the communities of concern capture EJ households.
- b) **Evaluate populations (rather than communities) of concern.** While identifying areas of concern is useful for targeting investments to specific locations, one problem with conducting an equity analysis based on areas of concern that rely on thresholds is that (regardless of the threshold selected) a number of non-target households are included in the EJ analysis while a number of target households are excluded from the analysis. Alternatively, the evaluation can center on populations of concern by looking at outcomes for residents by TAZ and combining that information with TAZ-level demographic information (which may require assuming that block group populations are evenly distributed in space). In other words, the evaluation can occur at the TAZ level, and instead of weighting those outcomes by the population in the area of TAZ captured (as many analyses do) it could weight outcomes by the population of each demographic group (low income vs. other, minority vs. non-minority). The resulting analysis would include an estimate of the average or distribution of outcomes by race/ethnicity and income category.
- c) **Use metrics in addition to race/ethnicity and income.** Communities and populations of concern can be defined using other measures of household or community needs and opportunities. The Center for Regional Change at UC Davis has recently completed a Regional Opportunity Index (data and documentation are available at <http://mappingregionalchange.ucdavis.edu/roi/index.html>, and CRC staff² are available for assistance in using the data). The ROI is based on information about educational, economic, and housing opportunities, as well as mobility, health and the environment, and civic life. The ROI provides a

² Contact Dana Rowangould at dlrowan@ucdavis.edu or Catherine Garoupa White at cgaroupa@ucdavis.edu for assistance.

summary measure of the places and people most in need of investments. The ROI (or other measures of opportunities and outcomes in communities) could be used to identify an alternative set of communities of concern that could be evaluated alongside income and minority status (which are required components of equity analysis).

Present quantitative data that can be used to evaluate criteria

The analysis should present the data required to determine whether the criteria have been met. The RTP provides a qualitative description of the location of project investments, but does not include a summary of quantitative data (e.g. dollars allocated to projects in each area) or any additional detail about the distribution of investments.

While a qualitative description of where investments will occur is helpful (e.g., the discussion of transit investment and ridership on page 10-13), with no details about the magnitude of investments or per-capita investment comparisons for EJ vs. non-EJ groups, the discussion is not sufficient for demonstrating whether disproportionate environmental justice impacts of investments will occur.

Note that while the bulk of the RTP analysis focuses on the location of project investments, the costs and benefits of those investments are unclear; for example does each part of the assessment include consideration of the number and makeup of people in each area, or of vehicle ownership (e.g. low-income households that do not own vehicles may benefit far more from transit and bike/ped projects than from road projects.) Changes in travel costs or travel time, or examining per capita investments by race/income and mode choice may better represent effects in EJ vs non-EJ communities or populations.

Additionally, the discussion of air quality indicates that any area with a project will benefit due to congestion improvements in the long run. The evaluation lacks detail and the assumption that projects will only lead to long term air quality improvements is not well demonstrated, as capacity increases can lead to greater air quality impacts for adjacent communities in the long run (as overall travel along a road increases due to induced demand).

Evaluate SCS scenario outcomes for environmental justice areas or populations in terms of explicit criteria

The evaluation should include quantitative data for EJ and non-EJ groups for the objectives and metrics identified above, and it should evaluate that data in terms of the criteria identified above.

As previously noted, the investment and air quality information presented is qualitative and does not compare EJ to non-EJ groups. This is not sufficient for demonstrating whether disproportionate environmental justice impacts will occur.

Note that the evaluation should include the SCS preferred scenario, as well as alternative scenarios and a 'no-project' scenario. Evaluations of all scenarios allows for comparisons between outcomes. In particular, comparison to a 'no-project' scenario (or evaluation of only those changes that will occur under the proposed RTP/SCS plan) is important for understanding the impact of the RTP/SCS.

Discuss any potential for adverse impacts and potential alternatives or mitigations

Once a quantitative comparison is presented using the criteria laid out above, the text should clearly state whether there are disproportionate costs or benefits to EJ groups. If disparities are found, potential mitigations or alternatives should be explored.

The RTP indicates that no disparities are expected, however as described above the methods used to evaluate that could be improved.

Example Environmental Justice Analysis

Although each region is different and has needs and challenges, the Sacramento Area Council of Governments' (SACOG's) environmental justice analysis, completed for their 2012 RTP, provides an example of an analysis that addresses many of the issues outlined above. While the approach used in Sacramento may not apply directly in Madera County, the concepts presented provide a useful illustration of this type of analysis.

The SACOG 2012 RTP, which includes discussions of equity, public participation, and the environmental justice methodology, is available here:

<http://www.sacog.org/2035/mtpscsc/>

For Additional Information

The Center for Regional Change is available to discuss the environmental justice analysis further and to provide assistance as feasible. Community advocates and Madera County Transportation Commission staff are welcome to contact Dana Rowangould (dlrowan@ucdavis.edu) or Catherine Garoupa White (cgaroupa@ucdavis.edu) with any questions or comments.

Craig K. Breon

Conservationist
Attorney at Law

June 26, 2014

Patricia Taylor, Deputy Director
Madera County Transportation Commission
2001 Howard Road, Suite 201
Madera, CA 93637
Submitted via email to: patricia@maderactc.org

Re: Madera County 2014 Regional Transportation Plan and Sustainable Community Strategy

Dear Ms. Taylor:

The following are comments from the Tehipite Chapter of the Sierra Club on the Madera County 2014 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) as well as the Draft Environmental Impact Report (DEIR or EIR) on those documents. The Tehipite Chapter has been participating in development of the RTP/SCS. Comments are mixed between EIR comments and comment, questions, and recommendations regarding the RTP and SCS. We wish to note that the Chapter may send additional comments on these documents prior to the final decision by the Madera County Transportation Commission (MCTC) Board on this important project.

The Sierra Club is the oldest and largest grassroots environmental organization in the United States. The mission of our 1.2 million members and supporters is to explore, enjoy, and protect the wild places of the earth; practice and promote the responsible use of the earth's ecosystems and resources; and educate and enlist humanity to protect and restore the quality of the natural and human environment. Our members who live in Madera County engage in a range of conservation activities including protection of communities from air and water pollution, protection of wildlife species and habitat, preservation of open space and farmland, and partnership with those within our communities historically disadvantaged and frequently bearing the greatest burden of negative health and environmental impacts.

The Tehipite Chapter wants to thank the MCTC Board and staff for the work they have put into the RTP/SCS process. We understand that this is the County's first attempt to incorporate the implementation of SB 375 and that this is a somewhat new process for us all. However, the RTP/SCS and the DEIR do not at this point meet the legal requirements of either SB 375 or CEQA, as explained below. Therefore, we urge the MCTC to revise and recirculate the document reflecting both

#A

the legal changes that are needed and providing an RTP/SCS that better reflects the priorities your constituents and community organizations expressed during the RTP/SCS process.

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cont.

In particular, we are profoundly concerned that the SCS did not arrive at a scenario that even comes close to meeting the SB 375 greenhouse gas (GHG) reduction targets designated for Madera County. Through a combination of changes to projected land uses and—in particular—changes to transportation funding priorities, it is possible for the County to meet these targets, or at least to come closer, reducing or avoiding a number of significant impacts in the process.

Clarity of Assumptions

As MCTC staff surely knows, Kern County’s revelations of the assumptions behind their GHG emissions calculations has led to questions regarding the authenticity of SB 375 compliance. The law is clear on the following:

“A metropolitan planning organization shall disseminate the methodology, results, and key assumptions of whichever travel demand models it uses in a way that would be useable and understandable to the public.” Government Code, Section 14522.2(a)

#B

In light of this, please explain how MCTC has handled the issue of assumptions in your modeling. In particular, we are interested in background assumptions related to the local economy over time and to the effect of gas prices on your GHG calculations. Given the poor performance of Madera in terms of reaching the SB 375 targets, we are concerned that, absent these assumptions, Madera’s GHG emissions might have been projected to increase at even greater levels.

MCTC Does Have Authority Over the RTP Projects

While we acknowledge that, under SB 375, MCTC has no direct authority over local land use decisions, we dispute the claim—made throughout the EIR—that this fact means that MCTC has little authority to condition road projects listed in the RTP. In fact, MCTC has significant authority over RTP projects—it has the authority and responsibility to determine which transportation projects it will include in the RTP, without which approval, projects cannot receive federal funds. It has the authority to determine which projects it will fund with local Measure T dollars, and (by virtue of preparing an SCS), which land use projects will be eligible for certain CEQA exemptions and other streamlined permitting requirements authorized under SB 375. We believe that MCTC should use that authority to condition RTP projects so as to achieve or at least come closer to the SB 375 targets and reduce or eliminate a multitude of “significant, unavoidable” impacts (e.g. land conversion and greenhouse GHG emissions, see below).

#C

As noted by Judge Timothy Taylor in the initial case challenging a post-SB 375 RTP/SCS (*Cleveland Nat’l Forest Foundation et al v. San Diego Ass’n of Governments*, San Diego County Case No. 2011-00101593):

“Second [reason for overturning the EIR], SANDAG's response has been to "kick the can down the road" and defer to "local jurisdictions." [Citations omitted]... This perverts the regional planning function of SANDAG, ignores the purse string control SANDAG has over TransNet funds, and more importantly conflicts with Govt. Code section 65080(b)(2)(B) quoted above.” (Page 12)

#C
cont.

Madera County’s half-cent sales tax for transportation, Measure T, is quite similar to San Diego’s TransNet funds. These dollars are then often used as matching funds, allowing Madera greater access to certain State and Federal funding mechanisms. This gives MCTC significant influence over which projects get funded.

#D

Your own website is quite clear on the origin and control of Measure T funds. The main page explaining Measure T explains that MCTC, “was established to administer the proceeds of Measure “T”. That same page goes on to say, “The MCTA administers Measure “T” revenues through a planning and programming process, which includes an Expenditure Plan and Annual Work Program.” (http://www.maderactc.org/?page_id=12) The website’s PowerPoint presentation for Measure T is no less clear about MCTC authority: “MCTA and MCTC can manage the delivery of projects” (<http://www.maderactc.org/wp-content/uploads/2013/04/MeasureTPresentation091008.pdf>)

Not only is Measure T projected to raise nearly \$250 million over its duration, “Leveraging” State and Federal funds is clearly a highlighted intent of Measure T. The Previous Measure A raised \$65 million and leveraged an additional \$50 million in State and Federal funds. <http://www.maderactc.org/wp-content/uploads/2013/04/MeasureTPresentation091008.pdf> If ratios were similar, Measure T would leverage an additional approximately \$200 million in funds. Assuming Measure T is extended, Tables 7-2 and 7-3 of the RTP (page 7-4) this statement seems to explain the funding picture, "Local funds will be the greatest source of transportation funding for Madera County at \$842.67 million or 61%.”

Please state what percentage of the overall funding for this RTP’s projects from now to 2026, the sunset date of Measure T, is projected to come from Measure T and funds leveraged as a result of the measure. Please state what percentage of projects in the RTP list are expected to benefit from Measure T and leveraged funds over the course of the measure.

Please provide a table or simple explanation of funding streams supporting these investments, along with comments about the degree of flexibility that the MCTC Board has control over each, as compared to funding streams that it does not (e.g. State or Federal funds specifically earmarked for a given local project and not requiring local matching funds). What percentage, roughly, of the total funds distributed under the RTP does the MCTC and MCTA control?

#E

Many federal and state funding sources have flexibility embedded within them. For each of the funding streams used in this plan, please point to the policy framework

that MCTC uses to allocate those funds. For example, does MCTC receive Regional Surface Transportation Program (RSTP) funds? Since that program can fund a wide variety of projects including construction of highways and bridges, mitigation of wildlife or wetland impacts by an RSTP project, transit capital, and active transportation, how does MCTC allocate the funds it receives? Similarly, does MCTC receive Congestion Mitigation and Air Quality Improvement (CMAQ) Program and Transportation Development Act (TDA) funds, and if so how are those allocated?

#E
cont.

[Aside: It is curious that, of the various categories of Measure T funding, only the *Safe Routes to Schools and Jobs Program* provides a category of funding entitled “Flexible.” In fact, the flexible funds make up nearly one-half of the total of this funding category. <http://www.maderactc.org/wp-content/uploads/2013/04/MeasureTPresentation091008.pdf>

#F

Please provide a list of what projects have been funded under this “flexible” funding category. We suggest that MCTC provide a public opportunity to discuss how these flexible funds have been used in the past and how they should be used in the future.]

Measure T has an amendment process, and thus funding allocations could be amended in order to respond to the State goals and mandates of SB 375 and, to a lesser extent, to reduce environmental impacts associated with the RTP projects. We suggest that MCTC initiate an effort to consider amending Measure T funding to better achieve the goals of SB 375. This seems warranted given that the County’s current RTP/SCS effort represents the worst SCS performance in the State.

#G

Next, the fact that MCTC creates the criteria for transportation project selection (MCTC 2014 RTP SCS EVALUATION CRITERIA—RTP, Appendix A), and thus decides to a large extent which projects will be included and which will not (or, at least, prioritization of funding), indicates authority over the RTP, arguing against deferral of mitigation measures. As the RTP notes, at page 5-5:

#H

“MCTC prepared quantification and qualification prioritization criteria for review by the RTP and SCS Roundtable. Based upon comments received from the Roundtable, the criteria was revised and applied to evaluate the street and highway capacity increasing projects. Once a full range of candidate regional highway and arterial projects was identified for the 2014 RTP and SCS by each of the local agencies, an analysis framework consisting of measurable criteria was developed to establish project priorities before the projects are modeled.”

This would clearly indicate that it is MCTC that creates the criteria for project evaluation, and thus to a great extent for project selection.

There is a regional Level-of-Service policy of LOS “D” evidently. This is mentioned in a variety of places in the EIR, such as page 1-50, stating:

#I

“While improved mobility will result from implementation of the projects contained in the RTP as well as the mitigation measures

listed above, some significant unavoidable impacts, considering the regional minimum LOS policy of “D” will occur.”

#I
cont

Is this LOS policy binding on the local jurisdictions? Can a local jurisdiction adopt a different LOS policy? If one did so, would there be any ramifications in terms of funding or transportation project evaluation and selection?

Evaluation Criteria

While we appreciate that the Roundtable was consulted regarding Evaluation Criteria and that the criteria were, to some extent, revised, we believe more work is required in this area.

#J

One of the mitigation measures for Impact 3.17 states:

“Transit Funding: Local jurisdictions can and should prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, including:

- Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic;
- Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.” (EIR, page 1-47)

It would seem that these mitigation measures are at odds with MCTC’s actual selection criteria. If one looks at Appendix A, the greatest points are awarded in categories that emphasize automobile transit: 1) Improved Level of Service, with a possible 16 points; and 2) Improved Safety (primarily for autos), with a possible 10 points. Compare this with categories such as Supports Other Modes of Transportation, with a maximum of 2 points, or Improves Air Quality, with a maximum of 3 points. It seems that what MCTC says “can and should” be done by local jurisdictions is belied by their own actions.

Please explain why it seems that the above mitigation measures that are recommended as feasible by the EIR are not reflected in the SCS Evaluation Criteria. We recommend, as a mitigation measure for traffic, air quality, public health, and other impacts, that the Evaluation Criteria be amended to reflect what the EIR says “can and should” be done. If this cannot be done in the context of this current decision-making process, we recommend that the MCTC provide a focused public hearing to discuss the Evaluation Criteria.

#K

In particular, MCTC should abandon or deemphasize some of its conventional indicators of performance. The following is an excerpt from “Performance Evaluation,” by the Victoria Transport Policy Institute (<http://www.vtpi.org/tdm/tdm131.htm>):

#L

“Conventional Performance Indicators

Conventional indicators tend to evaluate transport system performance based on motor vehicle travel conditions (Markow 2012):

- [Roadway Level-of-Service](#) (LOS), which is an indicator of vehicle traffic speeds and congestion delay at a particular stretch of roadway or intersection.
- Average traffic speeds.
- Average congestion delay, measured annually per capita.
- Parking convenience and affordability (low price).
- Crash rates per vehicle-mile.

Because they focus on motor vehicle travel these methods favor automobile-oriented improvements over other objectives and solutions (Cortright 2010; DeRobertis, et al. 2014). For example, they justify road and parking facility capacity expansion that tends to create [Automobile Dependent](#) transport and land use systems, increasing per capita vehicle travel and reducing the viability of walking, cycling and public transit. This increases per capita vehicle ownership and use, increasing resource consumption, pollution emissions and land consumption, and exacerbating the transport problems facing non-drivers.

By evaluating impacts per vehicle-mile rather than per capita, they do not consider increased vehicle mileage to be a risk factor and they ignore vehicle traffic reductions as possible solution to transport problems. For example, from this perspective an increase in per capita vehicle crashes is not a problem provided that there is a comparable increase in vehicle mileage. Increased vehicle travel can even be considered a traffic safety strategy if it occurs under relatively safe conditions, because more safe miles reduce per-mile crash and casualty rates.”

The article also suggest alternate performance indicators. Please respond to the above and discuss whether—in light of the overall policy goals of less auto-dependent land use and transportation planning—the evaluation criteria actually hinder rather than further progress towards that goal.

We note that the EIR itself acknowledges that the evaluation criteria themselves can be considered as mitigation measures. A mitigation measure for impact 3.17 states, “MCTC will continue to score funding programs considering a projects ability to enhance complete streets objectives.” Since, unlike most every other mitigation measure, MCTC cannot say that the evaluation criteria are under the authority of local jurisdictions, we request that the EIR discuss the use of the evaluation criteria to mitigate other significant, unavoidable impacts cited in the EIR and then suggest criteria changes based on that evaluation.

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cont

#M

Overall Problems with Mitigation Measures

This section of our comments discusses problems that arise in respect to the proposed mitigation measures in the EIR. In general, numerous mitigations are well-meaning statements of what a better Madera County might look like. What they are not is what CEQA requires—specific, enforceable mitigation measures that will reduce the dozens of significant, unavoidable impacts listed in the document.

#N

It is not enough to repeatedly claim that the programmatic nature of the EIR does not allow specific, enforceable standards by MCTC. An example here would be from EIR page 1-39:

“Local agencies will be encouraged to update general, area, community and specific plans to reflect projects included in the 2014 RTP and future land use allocations reflected in the SCS.”

To this nice intent should be added:

“When such updates do occur, MCTC staff will provide an evaluation of compliance with RTP/SCS land use allocations as well as an evaluation of whether those plans comply with the mitigation measures contained in this EIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.”

This proposed mitigation measure does not require MCTC to control local land uses in any way, but it would be an enforceable measure that could make a difference in reducing significant impacts.

Next, most every mitigation measure contains the following statement: “As appropriate, MCTC will encourage the implementation of the above-noted mitigation strategies intended to avoid or reduce the significant impacts identified.” Please describe when it will be deemed “appropriate” for MCTC to weigh in, identifying thresholds for MCTC involvement or specific ways in which MCTC will be involved. Such measures are needed in order to make these mitigation measures enforceable and thus in compliance with CEQA.

#O

Further, while most of the proposed mitigation measures contain vague statements such as “should” or “can and should” or “where feasible,” some of the measures do actually seem specific and enforceable. Examples of the latter would be impact 3.4.2, which states in part, “project implementation agencies will ensure implementation of mitigation measures” or “Specifically, at the project level, implementing agencies shall require or perform air toxic risk assessments to determine mobile source air toxic impacts.”

#P

Please explain why seemingly specific, enforceable mitigation measures such as mentioned above occur in the EIR, as compared to the vast majority. It appears that they occur where there are already legal requirements to do so.

However, even such examples are subject to the ubiquitous statement—contained in the “Significance after Mitigation” sections—that MCTC does not implement these mitigation measures, only the local jurisdictions do. Which takes precedent—the enforceable mitigation measure or the overall statement that MCTC has no authority?

#P
cont

Impacts to Farmlands and Natural Lands

This section of comments addresses impacts to both farmlands and natural lands (the term natural lands is used to cover what might traditionally be called “open space,” meaning undeveloped lands not considered agricultural lands). The EIR states, at page 3-31 that transportation and land use projects will convert approximately 1876 acres of agricultural lands. The EIR’s biotic section does not appear to include any similar calculation of acres converted for impacts to natural lands, though Table 6-6 of the RTP discusses “resource” lands. We believe that transportation projects alone, and certainly the land use projects considered, will have significant impacts to natural lands. Natural lands provide aesthetic and biotic value and may provide a sink for carbon dioxide emissions, thus reducing GHG emissions. The EIR should contain a description of natural lands to be converted, including a rough break-down by land type (grazing lands, forest etc).

#Q

In considering impacts to agricultural lands and natural lands, the EIR should distinguish between (i.e. quantify) lands converted due to transportation projects and lands converted by land use development projects. The reason for this will be clear in the following paragraphs.

#R

While acknowledging that MCTC has no direct authority over local land use decisions, it does have the authority to consider programmatic mitigation measures that would reduce otherwise significant, unavoidable impacts to agricultural and natural lands. In fact, MCTC’s lack of authority over local land use decisions makes it all the more important to exercise authority—both legal and financial—where it does have it. MCTC should take direct responsibility for projects under its authority—RTP projects.

#S

CEQA requires that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” CEQA requires that agencies “mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.” (Pub. Res. Code §21002.1(b)) CEQA requires that “the EIR must propose and describe mitigation measures that will minimize the significant environmental effects that the EIR has identified.” (*Napa Citizens for Honest Gov’t v. Napa County Bd. Of Supervisors*, 91 Cal.App.4th 342, 360 (2001))

The California Department of Conservation suggests the use of agricultural conservation easements as mitigation for farmland loss. See

<http://www.conservation.ca.gov/dlrp/cfcp/Pages/Index.aspx>.

The DEIR must evaluate the feasibility of a programmatic mitigation measure requiring a minimum of 1:1 mitigation for projects in the RTP with impacts to farmland and natural lands.

As regional examples of mitigation and lack thereof, we provide the following, from the Caltrans District 6 environmental documents website. References are typically to Mitigated Negative Declarations (MND). Dates refer to the date of the document. (<http://www.dot.ca.gov/dist6/environmental/envdocs/d6/>)

- Freeman Gulch Four-Lane Project, Sept 2007, Kern County:

Impact to 413-422 acres of habitat for a 16.4-mile long widening from two to four lanes. Mitigation included. (MND Summary, page ix)

- San Luis Obispo and Kern Counties Route 46 4-Lane Widening Project, April 2005:

Widening from two to four lanes over 39.3 miles of roadway. 108 acres of farmland impacted. (MND Summary, page xiii) 414.9 acres of wildlife habitat permanently impacted (also some temporarily impacted). (MND, page 49) Project mitigated for wildlife habitat but not farmland.

- Wasco Four-Lane Project, Kern County, Oct 2006:

5.22 mile segment of State route 46 (MND Summary vii). 26.31 acres of kit fox habitat lost (and 7 acres temporarily), (MND, page 114) 32.7 acres of Prime Farmland lost, but farmland other than Prime is not mentioned. (MND, page 35) Mitigated for habitat but not for farmland.

- Inyokern Four-Lane Project, Kern County, Jan 2008:

Conversion of two-lane highway to four-lane, divided expressway over 15.5 miles of roadway. Conversion of 480-520 acres of habitat. (MND summary, page vi) Mitigation for habitat loss. (MND, page 70)

- State Route 41 Passing Lanes Project, Madera County, March 2011

29.4 acres of impact to grazing land for 1.4 and 1.2 mile passing lanes (MND summary pages iii and iv).

- Road 80 Widening Project, Tulare County, Oct 2006

Widening/improvement of a 16-mile segment of road. 54.1 acres of impact to farmland, mitigated at a 1:1 ratio. (MND, page 27)

- Tulare Expressway, Tulare County, Sept 2012 Draft EIR

Approximately 320 acres of farmland to be converted in acquiring a four-lane right of way over 9.3 miles. (EIR summary, page ix) No proposed mitigation.

#S

It appears that CalTrans generally finds project impacts to farmland to be less than significant, though cumulatively the numbers for just these listed projects add into the hundreds. Thus, MCTC may be the better organization to consider cumulative impacts of land conversion from the RTP projects.

It should also be noted that CalTrans does often mitigate for the loss of rare wildlife habitats, but not necessarily for the loss of natural lands without identified rare species. This is the result of formal consultations with State or Federal wildlife agencies. We would conclude, then, that CalTrans mitigates when forced to but rarely under its own authority as a CEQA Lead Agency, further justifying the MCTC's imposing mitigation requirements on these projects.

Thus, in order to reduce the impacts to agricultural lands and natural lands from RTP projects, MCTC should adopt a mitigation measure requiring 1:1 acreage mitigation, at a minimum, for conversion of these lands due to RTP projects.

MCTC must adopt any feasible mitigation measure that would avoid, minimize, rectify, reduce, eliminate, or compensate for that loss where they have the authority to do so. [CEQA Guidelines, Sec. 15370] Of particular importance in the context of the loss of agricultural and natural lands is the CEQA language regarding compensation, "(e) Compensating for the impact by replacing or providing substitute resources or environments." It is this language that mandates that MCTC consider off-site preservation as a potentially feasible mitigation measure under CEQA.

The following factors show why mitigation for the loss of agricultural land is feasible. We believe that similar factors would apply to natural land, except to note that the cost of conservation easements for natural lands would likely be far less than for agricultural lands.

- **Local Precedent:** The Caltrans expansion of Highway 80 through portions of Tulare County (see above) provides a local example of how such mitigation can be accomplished. Please cite any examples of transportation projects that have mitigated for the conversion of agricultural or natural lands in Madera County.
- **Regional Precedent:** Many regional jurisdictions have adopted programs or ordinances requiring farmland preservation or a mitigation fee to mitigate for farmland loss. These include the cities of Davis, Stockton, Brentwood, Tracy, Lathrop, and Manteca as well the counties of Yolo and San Joaquin.
- **Financial Feasibility:** Estimates of easement value for agricultural land in this region range from \$4,000 per acre (personal communication with Chris Moi, Director of Land Transactions for Sequoia Riverlands Trust) to \$8,000 per acre (based on previous mitigation agreements between the Kern-Kaweah Chapter of the Sierra Club and project developers in Kern County). As an example, the Kern-Kaweah Chapter has previously estimated the cost to mitigate for the loss of 320 acres farmland associated with the Tulare Expressway project in Tulare County. (see Attachment A, page 5) That estimate shows a total cost of \$1.28 million to \$2.56

#S

million, or 1.5%-3% added to the estimated cost of the two alternatives considered by CalTrans. Given that the Tulare Expressway Alternative 2 is \$2.1 million more than Alternative 1 and was not rejected as financially infeasible, it would appear that Caltrans can afford the additional mitigation cost. Each Caltrans District has EEMP funds specifically set aside for the mitigation of farmland loss, and these funds can be matched by the Department of Conservation. Prices for easements over grazing land and most other natural lands would cost even less than farmland easements.

- **Technical Feasibility:** Local land trusts are the most logical entity to hold conservation easements or receive mitigation fees associated with RTP projects. Such trusts hold a number of comparable easements on local farmland and have the capacity to monitor and manage such easements or funds (management funds are typically included in the cost of facilitating the easements).

Mitigation of this type is better done at the programmatic level. First, a programmatic-level decision would streamline the CEQA process for future RTP projects. Second, a programmatic-level program of mitigation would be easier to implement than project-by-project mitigations. For example, such a program could take advantage of concepts already considered in the State's Regional Advance Mitigation Planning (RAMP) program. (See <https://rampcalifornia.water.ca.gov/>)

#S

It should be noted that a mitigation requirement such as is proposed here would only affect a small portion of the overall RTP project list. Projects in previously urbanized areas would generally not be affected. Most of the smaller cities do not build road projects of any significant size. Most of the affected projects would either have CalTrans or Madera County as the Lead Agency, thus making the requirement applicable primarily to entities large enough to handle the planning required.

Any mitigation requirement should include the following parameters:

- Mitigation should only be employed when it is shown that avoidance of land conversion cannot be accomplished without fundamentally compromising project objectives.
- Mitigation lands should be of at least equal quality land (i.e., if 63 acres of prime farmlands are being converted, then the preserved lands should include at least 63 acres of prime farmland).
- Mitigation lands should be located in Madera County. While we are aware that the problem of land conversion is a regional one, there are several reasons to require mitigation land to be local. If mitigation lands are far flung, it will be very hard to monitor and enforce the mitigation condition. A local land trust working with local land is much more accountable to the local public good than is one hundreds of miles away. In addition, preservation of local farmland helps to protect our area's very important agricultural economy and helps makes it possible for local consumers to buy fresher, locally grown products. Finally, the aesthetic value of land is something that we should treasure locally.

- Mitigation agreements should specify that their length be “in perpetuity.”

Next—and again considering that MCTC cannot directly control local land uses—the EIR should nonetheless consider: 1) using MCTC’s purse strings to influence local land use decisions, thus further mitigating impacts to land conversion; and 2) the need to mitigate the growth-inducing impacts of the transportation projects that MCTC does control.

#S

In the EIR, MCTC should evaluate the inclusion of a programmatic mitigation measure to address the growth-inducing impacts of transportation projects in the RTP. The language we propose is: “RTP projects that are found, in accordance with CEQA, to induce growth or remove a substantial barrier to growth will not receive funding until the applicable local jurisdiction(s) has adopted land conservation/mitigation policies in line with those adopted in the RTP/SCS EIR.” This would, most likely, have to apply only to those projects over which MCTC has full or partial purse string control, as compared to projects solely funded with State, Federal, or local jurisdiction funding.

#T

This concept is not unfamiliar. In the Bay Area, MTC created a program requiring local jurisdictions to create Priority Development Areas, adopt a Complete Streets resolution, and have a certified Housing Element in order to qualify for certain funding streams.

We appreciate the mitigation measure in the EIR on page 3-33 calling for MCTC Policy Board to consider a subcommittee to discuss, “possible policies aimed at the preservation of agricultural, natural and working lands.” However, there seems no reason to wait until after the RTP/SCS approval process to consider this possibility. Doing this is wholly within the MCTC Policy Board’s discretion. If it is considered a feasible mitigation measure (as inclusion in the EIR would imply), then delaying into the future a possible action that could be taken as part of the approval of this EIR would be a violation of CEQA.

#U

Greenhouse Gas Emissions

This section of comments begins by noting that Madera County’s projected GHG emissions associated with the proposed RTP/SCS are, by far, the worst in the State: by 2020, a 10% rise in per capita Vehicle Miles Traveled (VMT) and a 14% rise in per capita GHG emissions; by 2035, a 7% rise in per capita VMT and a 9% rise in per capita GHG emissions. These increases are *per capita*; the overall county emission increases are much higher once population growth is considered. As the EIR notes, at page 3-160, “increased GHG emissions associated with the proposed RTP and SCS could impact implementation of the State’s mandatory requirement under AB 32 to reduce statewide GHG emissions to 1990 levels by 2020.” While none of us can have much impact on the world-wide issue of Global Warming, all have a responsibility to take part in dealing with this potentially catastrophic problem. Madera County proposes not to do their part.

#V

First and foremost, the EIR must consider an alternative that does meet the County's designated GHG targets of 5% and 10% reductions. Under SB 375, the County will have to do this as part of the Alternative Planning Strategy (APS). It should do so now instead.

#W

While the RTP, the EIR, and MCTC website are filled with the language of sustainability, compact development, and serving the residents of Madera, the reality of project funding falls dismally short of this rhetoric. A vast amount of funding goes towards capacity generating highway expansions for future autos of future residents, while many of the fundamental elements needed to support existing communities to grow in healthy ways are given token amounts or nothing. Given the skewed Evaluation Criteria and presumption that it will be the County, rather than developers, that pay the lion's share of transportation infrastructure of New Towns, the language of a new direction rings hollow.

#X

Most likely, a key to meeting the GHG targets will be to ask the County Board of Supervisors to reconsider the Rio Mesa planning area. This does not necessarily mean severely restricting proposed development in that area. For example, a scenario of Transferred Development Rights, focusing development in ways that reduce GHG emissions, may be a viable option when combined with other changes throughout the County.

An alternative strategy for such an alternative that meets the targets might be to project delays in developments in the Rio Mesa area beyond the time horizon of SB 375. This would then allow MCTC to refocus considerable transportation dollars on serving infill development, transit, and other non-auto policies and programs—in accordance with their own stated priorities (see above).

Please discuss both of the above possible alternatives/mitigation measures in respect to reduction of GHG emissions and reducing other impacts currently considered significant and unavoidable.

Next, as the EIR acknowledges at page 3-160, "MCTC's ability to address and mitigate climate change impacts is limited primarily to policy and funding decisions related to planned roadway and alternative transportation improvements." Unfortunately, the RTP/SCS and accompanying EIR makes virtually no commitment to changing policy and funding decisions accordingly.

The DEIR's discussion of greenhouse gas emissions suffers from the same basic problem with all the proposed mitigation measures—an abdication of responsibility (see above). MCTC does not acknowledge its authority to condition RTP projects and funding in a manner that more forcefully deals with GHG emissions, leading to mitigation measures that are vague and unenforceable, in contravention of CEQA. It should be noted that even GHG reductions currently attributed to land use changes in the RTP/SCS are unenforceable by MCTC—all the more reason to search for alternatives or mitigation measures that are within the MCTC's purview.

#Y

We appreciate that MTCT is developing an SCS funding program. EIR, page 3-169. However, this is far too vague a commitment to satisfy the requirements of CEQA. The proposed mitigation measure must include standards, a timeline for implementation, and other details to ensure the public that this will be a meaningful program.

#Z

We also appreciate MCTC's proposal to create a workshop for local jurisdictions and others on methods to reduce GHG emissions. However, a centralized workshop might attract little attention amidst the busy schedules of local decision-makers, and MCTC's efforts might largely go to waste. Instead, MCTC should request time on local jurisdiction agendas for study sessions for Planning Commissioners, City Council Members, and the Board of Supervisors.

#AA

The EIR should evaluate MCTC's adoption of a mitigation measure that uses MCTC's funding authority to condition project funding on a local jurisdiction's commitment to create and adopt a Climate Action Plan (perhaps at or before the time of their next General Plan Update). The COG should then offer to help fund the creation of these plans, using funds from Measure T or other sources.

#BB

A measurable standard for this proposed Climate Action Plan mitigation could be derived from the GHG reduction goals of AB 32 and Executive Order S-3-05 (described in the EIR at pages 3-146-7). By calibrating those reduction goals with their timelines, MCTC could lay out a pathway for GHG reductions that the local Climate Action Plans would have to meet in order to receive funding. MCTC should also identify other sources for funding and implementation of Climate Action Plans.

Without such measurable and enforceable commitments to mitigate for the impacts of GHG increases, the DEIR fails to fulfill one of the most basic requirements of CEQA. Vague and unenforceable statements of encouragement and cooperation will not suffice.

#CC

Miscellaneous

Alternatives—Given how far from meeting the SB 375 targets the Preferred Alternative is, please explain why the “Major Change” Blueprint scenario was not considered as an alternative.

#DD

Jobs/Housing Fit—The EIR discusses jobs/housing balance, but does not address the issue of jobs/housing fit. Jobs/housing fit is a measure of whether the housing proposed for a given area is appropriate to the workforce needed for that same area. If not, commute lengths increase and associated air quality and other impacts also increase. For example, if a given Rio Mesa development includes primarily upper income housing, service workers for the area will have to drive from Madera or Fresno. Please provide a discussion of jobs/housing fit and, if needed, propose recommended mitigation measures for the appropriate land use agencies to implement.

#EE

Conclusion

The Tehipite Chapter appreciates the opportunity to bring forth our concerns to MCTC. While the RTP/SCS contains some elements of promise, there is considerable work to do before this RTP and accompanying EIR should be approved. We respectfully request that, in order to comply with SB 375 and CEQA, MCTC revise and recirculate the RTP/SCS and EIR for additional public comment. We are open to answering questions and to further dialogue on any of the issues contained in this letter. I can be reached at (408) 903-0289.

#FF

Sincerely,

A handwritten signature in black ink, appearing to read "Craig K. Breon". The signature is written in a cursive style with a horizontal line above it.

Craig K. Breon, Esq.
On behalf of the Tehipite Chapter of the Sierra Club



Tehipite Chapter of the Sierra Club
To explore, enjoy and preserve the nation's
forests, waters, wildlife and wilderness.

PO Box 5396
Fresno, CA 93755
559-229-4031

June 26, 2014

Patricia Taylor, Deputy Director
Madera County Transportation Commission
2001 Howard Road, Suite 201
Madera, CA 93637
Submitted via email to: patricia@maderactc.org

Re: Madera County 2014 Regional Transportation Plan and Sustainable Community Strategy

Dear Ms. Taylor:

The following are comments from the Tehipite Chapter of the Sierra Club on the Madera County 2014 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) as well as the Draft Environmental Impact Report (DEIR or EIR) on those documents. The Tehipite Chapter has been participating in development of the RTP/SCS comments; these are mixed between EIR comments and comment, questions, and recommendations regarding the RTP and SCS. We wish to note that the Chapter may send additional comments on these documents prior to the final decision by the Madera County Transportation Commission (MCTC) Board on this important project.

The Sierra Club is the oldest and largest grassroots environmental organization in the United States. The mission of our 1.2 million members and supporters is to explore, enjoy, and protect the wild places of the earth; practice and promote the responsible use of the earth's ecosystems and resources; and educate and enlist humanity to protect and restore the quality of the natural and human environment. Our 257 members who live in Madera County engage in a range of conservation activities including the protection of communities from air and water pollution, protection of wildlife species and habitat, preservation of open space and farmland, and partnership with historically disadvantaged residents within our communities who frequently bear the greatest burden of negative health and environmental impacts.

The Tehipite Chapter wants to thank the MCTC Board and staff for the work they have put into the RTP/SCS process. We understand that this is the County's first attempt to incorporate the implementation of SB 375 and that this is a somewhat new process for us all. However, the RTP/SCS and the DEIR do not at this point meet the legal requirements of

#A

either SB 375 or CEQA, as explained below. Therefore, we urge the MCTC to revise and recirculate the document reflecting both the legal changes that are needed and providing an RTP/SCS that better reflects the priorities your constituents and community organizations expressed during the RTP/SCS process.

#A
cont.

In particular, we are profoundly concerned that the SCS did not arrive at a scenario that even comes close to meeting the SB 375 greenhouse gas (GHG) reduction targets designated for Madera County. Through a combination of changes to projected land uses and—in particular—changes to transportation funding priorities, it is possible for the County to meet these targets, or at least to come closer, reducing or avoiding a number of significant impacts in the process.

Clarity of Assumptions

As MCTC staff surely knows, Kern County’s revelation of the assumptions behind their GHG emissions calculations has led to questions regarding the authenticity of SB 375 compliance. The law is clear on the following:

“A metropolitan planning organization shall disseminate the methodology, results, and key assumptions of whichever travel demand models it uses in a way that would be useable and understandable to the public.” Government Code, Section 14522.2(a)

#B

In light of this, please explain how MCTC has handled the issue of assumptions in your modeling. In particular, we are interested in background assumptions related to the local economy over time and to the effect of gas prices on your GHG calculations. Given the poor performance of Madera in terms of reaching the SB 375 targets, we are concerned that, absent these assumptions, Madera’s GHG emissions might have been projected to increase at even greater levels.

MCTC Does Have Authority Over the RTP Projects

While we acknowledge that, under SB 375, MCTC has no direct authority over local land use decisions, we dispute the claim—made throughout the EIR—that this fact means that MCTC has little authority to condition road projects listed in the RTP. In fact, MCTC has significant authority over RTP projects—it has the authority and responsibility to determine which transportation projects it will include in the RTP, without which approval, projects cannot receive federal funds. It has the authority to determine which projects it will fund with local Measure T dollars, and (by virtue of preparing an SCS) which land use projects will be eligible for certain CEQA exemptions and other streamlined permitting requirements authorized under SB 375. We believe that MCTC should use that authority to condition RTP projects so as to achieve, or at least come closer to, the SB 375 targets and reduce or eliminate a multitude of “significant, unavoidable” impacts (e.g. land conversion and greenhouse GHG emissions, see below).

#C

As noted by Judge Timothy Taylor in the initial case challenging a post-SB 375 RTP/SCS (*Cleveland Nat’l Forest Foundation et al v. San Diego Ass’n of Governments*, San Diego County Case No. 2011-00101593):

“Second [reason for overturning the EIR], SANDAG's response has been to "kick the can down the road" and defer to "local jurisdictions." [Citations omitted]... This perverts the regional planning function of SANDAG, ignores

the purse string control SANDAG has over TransNet funds, and more importantly conflicts with Govt. Code section 65080(b)(2)(B) quoted above.”
(Page 12)

#C
cont.

Madera County’s half-cent sales tax for transportation, Measure T, is quite similar to San Diego’s TransNet funds. These dollars are then often used as matching funds, allowing Madera greater access to certain State and Federal funding mechanisms. This gives MCTC significant influence over which projects get funded.

Your own website is quite clear on the origin and control of Measure T funds. The main page explaining Measure T explains that MCTC, “was established to administer the proceeds of Measure “T”. That same page goes on to say, “The MCTA administers Measure “T” revenues through a planning and programming process, which includes an Expenditure Plan and Annual Work Program.” (http://www.maderactc.org/?page_id=12) The website’s PowerPoint presentation for Measure T is no less clear about MCTC authority: “MCTA and MCTC can manage the delivery of projects” (<http://www.maderactc.org/wp-content/uploads/2013/04/MeasureTPresentation091008.pdf>)

Not only is Measure T projected to raise nearly \$250 million over its duration, “leveraging” State and Federal funds is clearly a highlighted intent of Measure T. The Previous Measure A raised \$65 million and leveraged an additional \$50 million in State and Federal funds. <http://www.maderactc.org/wp-content/uploads/2013/04/MeasureTPresentation091008.pdf>. If ratios were similar, Measure T would leverage an additional approximately \$200 million in funds. Assuming Measure T is extended, Tables 7-2 and 7-3 of the RTP (page 7-4) this statement seems to explain the funding picture: “Local funds will be the greatest source of transportation funding for Madera County at \$842.67 million or 61%.”

#D

Please state what percentage of the overall funding for this RTP’s projects from now to 2026, the sunset date of Measure T, is projected to come from Measure T and funds leveraged as a result of the measure. Please state what percentage of projects in the RTP list are expected to benefit from Measure T and leveraged funds over the course of the measure.

Please provide a table or simple explanation of funding streams supporting these investments, along with comments about the degree of flexibility that the MCTC Board has control over each, as compared to funding streams that it does not (e.g. State or Federal funds specifically earmarked for a given local project and not requiring local matching funds). What percentage, roughly, of the total funds distributed under the RTP does the MCTC and MCTA control?

Many federal and state funding sources have flexibility embedded within them. For each of the funding streams used in this plan, please point to the policy framework that MCTC uses to allocate those funds. For example, does MCTC receive Regional Surface Transportation Program (RSTP) funds? Since that program can fund a wide variety of projects including construction of highways and bridges, mitigation of wildlife or wetland impacts by an RSTP project, transit capital, and active transportation, how does MCTC allocate the funds it receives? Similarly, does MCTC receive Congestion Mitigation and Air Quality Improvement (CMAQ) Program and Transportation Development Act (TDA) funds and, if so, how are those allocated?

#E

[Aside: It is curious that, of the various categories of Measure T funding, only the *Safe Routes to Schools and Jobs Program* provides a category of funding entitled “Flexible.” In fact, the flexible funds make up nearly one-half of the total of this funding category.

<http://www.maderactc.org/wp-content/uploads/2013/04/MeasureTPresentation091008.pdf>

#F

Please provide a list of what projects have been funded under this “flexible” funding category. We suggest that MCTC provide a public opportunity to discuss how these flexible funds have been used in the past and how they should be used in the future.]

Measure T has an amendment process. Thus, funding allocations could be amended in order to respond to the State goals and mandates of SB 375 and, to a lesser extent, to reduce environmental impacts associated with the RTP projects. We suggest that MCTC initiate an effort to consider amending Measure T funding to better achieve the goals of SB 375. This seems warranted given that the County’s current RTP/SCS effort represents the worst SCS performance in the State.

#G

Next, the fact that MCTC creates the criteria for transportation project selection (MCTC 2014 RTP SCS EVALUATION CRITERIA—RTP, Appendix A), and thus decides to a large extent which projects will be included and which will not (or, at least, prioritization of funding), indicates authority over the RTP, arguing against deferral of mitigation measures. As the RTP notes, at page 5-5:

“MCTC prepared quantification and qualification prioritization criteria for review by the RTP and SCS Roundtable. Based upon comments received from the Roundtable, the criteria was revised and applied to evaluate the street and highway capacity increasing projects. Once a full range of candidate regional highway and arterial projects was identified for the 2014 RTP and SCS by each of the local agencies, an analysis framework consisting of measurable criteria was developed to establish project priorities before the projects are modeled.”

#H

This would clearly indicate that it is MCTC that creates the criteria for project evaluation, and thus to a great extent for project selection.

There is a regional Level-of-Service policy of LOS “D” evidently. This is mentioned in a variety of places in the EIR, such as page 1-50, stating:

“While improved mobility will result from implementation of the projects contained in the RTP as well as the mitigation measures listed above, some significant unavoidable impacts, considering the regional minimum LOS policy of “D” will occur.”

#I

Is this LOS policy binding on the local jurisdictions? Can a local jurisdiction adopt a different LOS policy? If one did so, would there be any ramifications in terms of funding or transportation project evaluation and selection?

Evaluation Criteria

While we appreciate that the Roundtable was consulted regarding Evaluation Criteria and that the criteria were, to some extent, revised, we believe more work is required in this area.

#J

One of the mitigation measures for Impact 3.17 states:

“Transit Funding: Local jurisdictions can and should prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, including:

- Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic;
- Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.” (EIR, page 1-47).

#J
cont.

It would seem that these mitigation measures are at odds with MCTC’s actual selection criteria. If one looks at Appendix A, the greatest points are awarded in categories that emphasize automobile transit: 1) Improved Level of Service, with a possible 16 points; and 2) Improved Safety (primarily for autos), with a possible 10 points. Compare this with categories such as Supports Other Modes of Transportation, with a maximum of 2 points, or Improves Air Quality, with a maximum of 3 points. It seems that what MCTC says “can and should” be done by local jurisdictions is belied by their own actions.

Please explain why it seems that the above mitigation measures that are recommended as feasible by the EIR are not reflected in the SCS Evaluation Criteria. We recommend, as a mitigation measure for traffic, air quality, public health, and other impacts, that the Evaluation Criteria be amended to reflect what the EIR says “can and should” be done. If this cannot be done in the context of this current decision-making process, we recommend that the MCTC provide a focused public hearing to discuss the Evaluation Criteria.

#K

In particular, MCTC should abandon or deemphasize some of its conventional indicators of performance. The following is an excerpt from “Performance Evaluation,” by the Victoria Transport Policy Institute (<http://www.vtpi.org/tdm/tdm131.htm>):

“Conventional Performance Indicators

Conventional indicators tend to evaluate transport system performance based on motor vehicle travel conditions (Markow 2012):

- [Roadway Level-of-Service](#) (LOS), which is an indicator of vehicle traffic speeds and congestion delay at a particular stretch of roadway or intersection.
- Average traffic speeds.
- Average congestion delay, measured annually per capita.
- Parking convenience and affordability (low price).
- Crash rates per vehicle-mile.

#L

Because they focus on motor vehicle travel these methods favor automobile-oriented improvements over other objectives and solutions (Cortright 2010; DeRobertis, et al. 2014). For example, they justify road and parking facility capacity expansion that tends to create [Automobile Dependent](#) transport and land use systems, increasing per capita vehicle travel and reducing the viability of walking, cycling and public transit. This increases per capita vehicle ownership and use, increasing resource consumption, pollution

emissions and land consumption, and exacerbating the transport problems facing non-drivers.

By evaluating impacts per vehicle-mile rather than per capita, they do not consider increased vehicle mileage to be a risk factor and they ignore vehicle traffic reductions as possible solution to transport problems. For example, from this perspective an increase in per capita vehicle crashes is not a problem provided that there is a comparable increase in vehicle mileage. Increased vehicle travel can even be considered a traffic safety strategy if it occurs under relatively safe conditions, because more safe miles reduce per-mile crash and casualty rates.”

#L
cont.

The article also suggests alternate performance indicators. Please respond to the above and discuss whether—in light of the overall policy goals of less auto-dependent land use and transportation planning—the evaluation criteria actually hinder rather than further progress towards that goal.

We note that the EIR itself acknowledges that the evaluation criteria themselves can be considered as mitigation measures. A mitigation measure for impact 3.17 states, “MCTC will continue to score funding programs considering a projects ability to enhance complete streets objectives.” Since, unlike most every other mitigation measure, MCTC cannot say that the evaluation criteria are under the authority of local jurisdictions, we request that the EIR discuss the use of the evaluation criteria to mitigate other significant, unavoidable impacts cited in the EIR and then suggest criteria changes based on that evaluation.

#M

Overall Problems with Mitigation Measures

This section of our comments discusses problems that are rife in respect to the proposed mitigation measures in the EIR. In general, numerous mitigations are well-meaning statements of what a better Madera County might look like. What they are not is what CEQA requires—specific, enforceable mitigation measures that will reduce the dozens of significant, unavoidable impacts listed in the document.

It is not enough to repeatedly claim that the programmatic nature of the EIR does not allow specific, enforceable standards by MTCT. An example here would be from EIR page 1-39:

“Local agencies will be encouraged to update general, area, community and specific plans to reflect projects included in the 2014 RTP and future land use allocations reflected in the SCS.”

#N

To this nice intent should be added:

“When such updates do occur, MCTC staff will provide an evaluation of compliance with RTP/SCS land use allocations as well as an evaluation of whether those plans comply with the mitigation measures contained in this EIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.”

This proposed mitigation measure does not require MCTC to control local land uses in any way, but it would be an enforceable measure that could make a difference in reducing significant impacts.

Next, most every mitigation measure contains the following statement: “As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.” Please describe when it will be deemed “appropriate” for MCTC to weigh in, identifying thresholds for MCTC involvement or specific ways in which MCTC will be involved. Such measures are needed in order to make these mitigation measures enforceable and thus in compliance with CEQA.

#O

Further, while most of the proposed mitigation measures contain vague statements such as “should” or “can and should” or “where feasible,” some of the measures do actually seem specific and enforceable. Examples of the later would be impact 3.4.2, which states in part, “project implementation agencies will ensure implementation of mitigation measures” or “Specifically, at the project level, implementing agencies shall require or perform air toxic risk assessments to determine mobile source air toxic impacts.”

#P

Please explain why seemingly specific, enforceable mitigation measures such as mentioned above occur for some mitigation measures in the EIR and not for the vast majority. It appears that they occur where there are already legal requirements to do so.

However, even such examples are subject to the ubiquitous statement—contained in the “Significance after Mitigation” sections—that MCTC does not implement these mitigation measures, only the local jurisdictions do. Which takes precedence—the enforceable mitigation measure or the overall statement that MCTC has no authority?

Impacts to Farmlands and Natural Lands

This section of comments addresses impacts to both farmland and natural lands (the term natural lands is used to cover what might traditionally be called “open space,” meaning undeveloped lands not considered agricultural lands). The EIR states, at page 3-31, that transportation and land use projects will convert approximately 1,876 acres of agricultural lands. The EIR’s biotic section does not appear to include any similar calculation of acres converted for impacts to natural lands, though Table 6-6 of the RTP discusses “resource” lands. We believe that transportation projects alone, and certainly the land use projects considered, will have significant impacts to natural lands. Natural lands provide aesthetic and biotic value and may provide a sink for carbon dioxide emissions, thus reducing GHG emissions. The EIR should contain a description of natural lands to be converted, including a rough breakdown by land type (grazing lands, forest, etc).

#Q

In considering impacts to agricultural lands and natural lands, the EIR should distinguish between (i.e. quantify) lands converted due to transportation projects and lands converted by land use development projects. The reason for this will be clear in the following paragraphs.

#R

While acknowledging that MCTC has no direct authority over local land use decisions, it does have the authority to consider programmatic mitigation measures that would reduce otherwise significant, unavoidable impacts to agricultural and natural lands. In fact, MCTC’s lack of authority over local land use decisions makes it all the more important to exercise authority—both legal and financial—where it does have it. MCTC should take direct responsibility for projects under its authority—RTP projects.

#S

CEQA requires that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” CEQA requires that agencies

“mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.” (Pub. Res. Code §21002.1(b)). CEQA requires that “the EIR must propose and describe mitigation measures that will minimize the significant environmental effects that the EIR has identified.” (*Napa Citizens for Honest Gov’t v. Napa County Bd. Of Supervisors*, 91 Cal.App.4th 342, 360 (2001))

The California Department of Conservation suggests the use of agricultural conservation easements as mitigation for farmland loss. See <http://www.conservation.ca.gov/dlrp/cfcp/Pages/Index.aspx>.

The DEIR must evaluate the feasibility of a programmatic mitigation measure requiring a minimum of 1:1 mitigation for projects in the RTP with impacts to farmland and natural lands.

As regional examples of mitigation and lack thereof, we provide the following from the Caltrans District 6 environmental documents website. References are typically to Mitigated Negative Declarations (MND). Dates refer to the date of the document. (<http://www.dot.ca.gov/dist6/environmental/envdocs/d6/>)

- Freeman Gulch Four-Lane Project, Sept 2007, Kern County:
Impact to 413-422 acres of habitat for a 16.4-mile long widening from two to four lanes. Mitigation included (MND Summary, page ix).
- San Luis Obispo and Kern Counties Route 46 4-Lane Widening Project, April 2005:
Widening from two to four lanes over 39.3 miles of roadway. 108 acres of farmland impacted. (MND Summary, page xiii). 414.9 acres of wildlife habitat permanently impacted (also some temporarily impacted) (MND, page 49). Project mitigated for wildlife habitat but not farmland.
- Wasco Four-Lane Project, Kern County, Oct 2006:
5.22 mile segment of State route 46 (MND Summary vii). 26.31 acres of kit fox habitat lost (and 7 acres temporarily) (MND, page 114). 32.7 acres of Prime Farmland lost, but farmland other than Prime is not mentioned (MND, page 35). Mitigated for habitat but not for farmland.
- Inyokern Four-Lane Project, Kern County, Jan 2008:
Conversion of two-lane highway to four-lane, divided expressway over 15.5 miles of roadway. Conversion of 480-520 acres of habitat. (MND summary, page vi) Mitigation for habitat loss (MND, page 70).
- State Route 41 Passing Lanes Project, Madera County, March 2011
29.4 acres of impact to grazing land for 1.4 and 1.2 mile passing lanes (MND summary pages iii and iv).
- Road 80 Widening Project, Tulare County, Oct 2006
Widening/improvement of a 16-mile segment of road. 54.1 acres of impact to farmland, mitigated at a 1:1 ratio (MND, page 27).
- Tulare Expressway, Tulare County, Sept 2012 Draft EIR

#S
cont.

Approximately 320 acres of farmland to be converted in acquiring a four-lane right of way over 9.3 miles (EIR summary, page ix). No proposed mitigation.

It appears that CalTrans generally finds project impacts to farmland to be less than significant, though cumulatively the numbers for just these listed projects add into the hundreds. Thus, MCTC may be the better organization to consider cumulative impacts of land conversion from the RTP projects.

It should also be noted that CalTrans does often mitigate for the loss of rare wildlife habitats, but not necessarily for the loss of natural lands without identified rare species. This is the result of formal consultations with State or Federal wildlife agencies. We would conclude, then, that CalTrans mitigates when forced to, but rarely under its own authority as a CEQA Lead Agency, further justifying the MCTC's imposing mitigation requirements on these projects.

Thus, in order to reduce the impacts to agricultural lands and natural lands from RTP projects, MCTC should adopt a mitigation measure requiring 1:1 acreage mitigation, at a minimum, for conversion of these lands due to RTP projects.

MCTC must adopt any feasible mitigation measure that would avoid, minimize, rectify, reduce, eliminate, or compensate for that loss where they have the authority to do so. [CEQA Guidelines, Sec. 15370] Of particular importance in the context of the loss of agricultural and natural lands is the CEQA language regarding compensation, "(e) Compensating for the impact by replacing or providing substitute resources or environments." It is this language that mandates that MCTC consider off-site preservation as a potentially feasible mitigation measure under CEQA.

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cont.

The following factors show why mitigation for the loss of agricultural land is feasible. We believe that similar factors would apply to natural land, except to note that the cost of conservation easements for natural lands would likely be far less than for agricultural lands.

- **Local Precedent:** The Caltrans expansion of Road 80 through portions of Tulare County (see above) provides a local example of how such mitigation can be accomplished. Please cite any examples of transportation projects that have mitigated for the conversion of agricultural or natural lands in Madera County.
- **Regional Precedent:** Many regional jurisdictions have adopted programs or ordinances requiring farmland preservation or a mitigation fee to mitigate for farmland loss. These include the cities of Davis, Stockton, Brentwood, Tracy, Lathrop, and Manteca as well the counties of Yolo and San Joaquin.
- **Financial Feasibility:** Estimates of easement value for agricultural land in this region range from \$4,000 per acre (personal communication with Chris Moi, Director of Land Transactions for Sequoia Riverlands Trust) to \$8,000 per acre (based on previous mitigation agreements between the Kern-Kaweah Chapter of the Sierra Club and project developers in Kern County). As an example, the Kern-Kaweah Chapter has previously estimated the cost to mitigate for the loss of 320 acres of farmland associated with the Tulare Expressway project in Tulare County (see Attachment A, page 5). That estimate shows a total cost of \$1.28 million to \$2.56 million, or 1.5%-3% added to the estimated cost of the two alternatives considered by CalTrans. Given that the Tulare Expressway Alternative 2 is \$2.1 million more than Alternative 1 and was not rejected as financially infeasible, it would appear that Caltrans can afford the additional mitigation cost. Each

Caltrans District has EEMP funds specifically set aside for the mitigation of farmland loss, and these funds can be matched by the Department of Conservation. Prices for easements over grazing land and most other natural lands would cost even less than farmland easements.

- **Technical Feasibility:** Local land trusts are the most logical entity to hold conservation easements or receive mitigation fees associated with RTP projects. Such trusts hold a number of comparable easements on local farmland and have the capacity to monitor and manage such easements or funds (management funds are typically included in the cost of facilitating the easements).

Mitigation of this type is better done at the programmatic level rather than the project level. First, a programmatic-level decision would streamline the CEQA process for future RTP projects. Second, a programmatic-level program of mitigation would be easier to implement than project-by-project mitigations. For example, such a program could take advantage of concepts already considered in the State’s Regional Advance Mitigation Planning (RAMP) program. (See <https://rampcalifornia.water.ca.gov/>)

It should be noted that a mitigation requirement such as is proposed here would affect only a small portion of the overall RTP project list. Projects in previously urbanized areas would generally not be affected. Most of the smaller cities do not build road projects of any significant size. Most of the affected projects would either have CalTrans or Madera County as the Lead Agency, thus making the requirement applicable primarily to entities large enough to handle the planning required.

Any mitigation requirement should include the following parameters:

- Mitigation should only be employed when it is shown that avoidance of land conversion cannot be accomplished without fundamentally compromising project objectives.
- Mitigation lands should be of at least equal-quality land (i.e., if 63 acres of prime farmland is being converted, then the preserved lands should include at least 63 acres of prime farmland).
- Mitigation lands should be located in Madera County. While we are aware that the problem of land conversion is a regional one, there are several reasons to require mitigation land to be local. If mitigation lands are far flung, it will be very hard to monitor and enforce the mitigation condition. A local land trust working with local land is much more accountable to the local public good than is one hundreds of miles away. In addition, preservation of local farmland helps to protect our area’s very important agricultural economy and helps makes it possible for local consumers to buy fresher, locally grown products. Finally, the aesthetic value of land is something that we should treasure locally.
- Mitigation agreements should specify that their length be “in perpetuity.”

Next—and again considering that MCTC cannot directly control local land uses—the EIR should nonetheless consider: 1) using MCTC’s purse strings to influence local land use decisions, thus further mitigating impacts to land conversion; and 2) the need to mitigate the growth-inducing impacts of the transportation projects that MCTC does control.

In the EIR, MCTC should evaluate the inclusion of a programmatic mitigation measure to address the growth-inducing impacts of transportation projects in the RTP. The language

#S
cont.

#T

we propose is: “RTP projects that are found, in accordance with CEQA, to induce growth or remove a substantial barrier to growth will not receive funding until the applicable local jurisdiction(s) has adopted land conservation/mitigation policies in line with those adopted in the RTP/SCS EIR.” This would, most likely, have to apply only to those projects over which MCTC has full or partial purse string control, as compared to projects solely funded with State, Federal, or local jurisdiction funding.

#T
cont.

This concept is not unfamiliar. In the Bay Area, MTC created a program requiring local jurisdictions to create Priority Development Areas, adopt a Complete Streets resolution, and have a certified Housing Element in order to qualify for certain funding streams.

We appreciate the mitigation measure in the EIR on page 3-33 calling for MCTC Policy Board to consider a subcommittee to discuss, “possible policies aimed at the preservation of agricultural, natural and working lands.” However, there seems no reason to wait until after the RTP/SCS approval process to consider this possibility. Doing this is wholly within the MCTC Policy Board’s discretion. If it is considered a feasible mitigation measure (as inclusion in the EIR would imply), then delaying into the future a possible action that could be taken as part of the approval of this EIR would be a violation of CEQA.

#U

Greenhouse Gas Emissions

This section of comments begins by noting that Madera County’s projected GHG emissions associated with the proposed RTP/SCS are, by far, the worst in the State: by 2020, a 10% rise in per capita Vehicle Miles Traveled (VMT) and a 14% rise in per capita GHG emissions; by 2035, a 7% rise in per capita VMT and a 9% rise in per capita GHG emissions. These increases are *per capita*; the overall county emission increases are much higher once population growth is considered. As the EIR notes, at page 3-160, “increased GHG emissions associated with the proposed RTP and SCS could impact implementation of the State’s mandatory requirement under AB 32 to reduce statewide GHG emissions to 1990 levels by 2020.” While none of us can have much impact on the world-wide issue of Global Warming, all have a responsibility to take part in dealing with this potentially catastrophic problem. Madera County proposes not to do their part.

#V

First and foremost, the EIR must consider an alternative that does meet the County’s designated GHG targets of 5% and 10% reductions. Under SB 375, the County will have to do this as part of the Alternative Planning Strategy (APS). It should do so now instead.

#W

While the RTP, the EIR, and MCTC website are filled with the language of sustainability, compact development, and serving the residents of Madera, the reality of project funding falls dismally short of this rhetoric. A vast amount of funding goes towards capacity-generating highway expansions for future autos of future residents, while many of the fundamental elements needed to support existing communities to grow in healthy ways are given token amounts or nothing. Given the skewed Evaluation Criteria and presumption that it will be the County, rather than developers, that pay the lion’s share of transportation infrastructure of New Towns, the language of a ‘new direction’ rings hollow.

#X

Most likely, a key to meeting the GHG targets will be to ask the County Board of Supervisors to reconsider the Rio Mesa planning area. This does not necessarily mean severely restricting proposed development in that area. For example, a scenario of Transferred Development Rights, focusing development in ways that reduce GHG emissions, may be a viable option when combined with other changes throughout the County.

An alternative strategy for such an alternative that meets the targets might be to project delays in developments in the Rio Mesa area beyond the time horizon of SB 375. This would then allow MCTC to refocus considerable transportation dollars on serving infill development, transit, and other non-auto policies and programs—in accordance with their own stated priorities (see above).

#X
cont.

Please discuss both of the above possible alternatives/mitigation measures with respect to reduction of GHG emissions and reducing other impacts currently considered “significant and unavoidable”.

Next, as the EIR acknowledges at page 3-160, “MCTC’s ability to address and mitigate climate change impacts is limited primarily to policy and funding decisions related to planned roadway and alternative transportation improvements.” Unfortunately, the RTP/SCS and accompanying EIR makes virtually no commitment to changing policy and funding decisions accordingly.

#Y

The DEIR’s discussion of greenhouse gas emissions suffers from the same basic problem as all the proposed mitigation measures—an abdication of responsibility (see above). MCTC does not acknowledge its authority to condition RTP projects and funding in a manner that more forcefully deals with GHG emissions, leading to mitigation measures that are vague and unenforceable, in contravention of CEQA. It should be noted that even GHG reductions currently attributed to land use changes in the RTP/SCS are unenforceable by MCTC—all the more reason to search for alternatives or mitigation measures that are within MCTC’s purview.

We appreciate that MCTC is developing an SCS funding program (EIR, page 3-169). However, this is far too vague a commitment to satisfy the requirements of CEQA. The proposed mitigation measure must include standards, a timeline for implementation, and other details to ensure the public that this will be a meaningful program.

#Z

We also appreciate MCTC’s proposal to create a workshop for local jurisdictions and others on methods to reduce GHG emissions. However, a centralized workshop might attract little attention amidst the busy schedules of local decision-makers, and MCTC’s efforts might largely go to waste. Instead, MCTC should request time on local jurisdiction agendas for study sessions to reach Planning Commissioners, City Council Members, and the Board of Supervisors.

#AA

The EIR should evaluate MCTC’s adoption of a mitigation measure that uses MCTC’s funding authority to condition project funding on a local jurisdiction’s commitment to create and adopt a Climate Action Plan (perhaps at or before the time of their next General Plan Update). The COG should then offer to help fund the creation of these plans, using funds from Measure T or other sources.

#BB

A measurable standard for this proposed Climate Action Plan mitigation could be derived from the GHG reduction goals of AB 32 and Executive Order S-3-05 (described in the EIR at pages 3-146-7). By calibrating those reduction goals with their timelines, MCTC could lay out a pathway for GHG reductions that the local Climate Action Plans would have to meet in order to receive funding. MCTC should also identify other sources for funding and implementation of Climate Action Plans.

Without such measurable and enforceable commitments to mitigate for the impacts of GHG increases, the DEIR fails to fulfill one of the most basic requirements of CEQA. Vague and unenforceable statements of encouragement and cooperation will not suffice.

#CC

Miscellaneous

Alternatives—Given how far from meeting the SB 375 targets the Preferred Alternative is, please explain why the “Major Change” Blueprint scenario was not considered as an alternative.

#DD

Jobs/Housing Fit—The EIR discusses jobs/housing balance, but does not address the issue of jobs/housing fit. Jobs/housing fit is a measure of whether the housing proposed for a given area is appropriate to the workforce needed for that same area. In other words, employees of a local employment center need to be able to afford to live in housing in close proximity to those jobs. If not, commute lengths increase and associated air quality and other impacts also increase. For example, if a given Rio Mesa development includes primarily upper-income housing, service workers for the area will have to drive from Madera or Fresno. Please provide a discussion of jobs/housing fit and, if needed, propose recommended mitigation measures for the appropriate land use agencies to implement.

#EE

Conclusion

The Tehipite Chapter appreciates the opportunity to bring forth our concerns to MCTC. While the RTP/SCS contains some elements of promise, there is considerable work to do before this RTP and accompanying EIR should be approved. We respectfully request that, in order to comply with SB 375 and CEQA, MCTC revise and recirculate the RTP/SCS and EIR for additional public comment. We are open to answering questions and to further dialogue on any of the issues contained in this letter. I can be reached at (408) 903-0289.

#FF

Sincerely,



Craig K. Breon, Esq.
On behalf of the Tehipite Chapter of the Sierra Club

From: Theresa Moss-Currier [<mailto:ladyjasmine1956@gmail.com>]
Sent: Thursday, June 26, 2014 10:55 AM
To: Dylan Stone; data.nations@gmail.com
Subject: Sustainable Communities Strategy

Dear Madera Commissioners --

I have concerns regarding the Madera County Sustainable Communities Environmental Impact Report. We are on the edge of having the worst Sustainable Communities Strategy results in the entire state which hurts our economic competitiveness and quality of life. The strategy plan would be the first plan in the state to miss its greenhouse gas reduction targets in the Senate Bill 375. It not only does not reduce climate pollution, it would actually increase per capita greenhouse gas emissions. There are other rural region that achieve much better results. One key reason for this failure is that Madera County is still planning New Towns, built on farmland, far from the City of Madera which affects current employment centers. Development means more strain on our existing water supply. So many wells have run dry recently. We cannot afford to have the worst performance of any region in the state. A poor Sustainable Communities Strategy will hurt state and federal grant funding, which is increasingly awarded on a competitive performance-oriented basis.

We can do better than this, and we should. Please ask staff to develop a scenario that meets the greenhouse gas reduction targets for consideration by the board.

*Sincerely
Theresa Moss-Currier
Madera Ranchos Resident*

From: trudyt@cvip.net [<mailto:trudyt@cvip.net>]
Sent: Thursday, June 26, 2014 4:40 PM
To: Dylan Stone
Subject: Madera County RTP/SCS plan - Comment

Dear Madera Commissioners –

I've lived and worked in Madera County for over 30 years and am filing a request for all Madera County Commissioners to TAKE NEEDED ACTION to protect county residents and resources. Please take real action on the following:

- Our region is poised to have the worst Sustainable Communities Strategy results in the entire state - hurting our economic competitiveness and quality of life. The draft Madera Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) would be the first plan in the state to MISS its greenhouse gas (GHG) reduction targets under Senate Bill 375. Not only would our plan not reduce climate pollution; it would actually increase per capita greenhouse gas emissions by 9% by 2040.

One key reason for this failure is that Madera County is still planning New Towns, built on farmland, far from the City of Madera and existing employment centers. Development means more strain on our existing--and finite--water supply. Water for new development will necessarily either come from our limited groundwater supplies or from water that is earmarked today for farm irrigation.

We need to TRIM BACK on the appetite for urban sprawl and refocus housing development as "infill" within our city's boundaries.

People need and want more multi-family housing than is proposed in the plan. The plan is for a 75-25% mix of single-family to multi-family homes. We need more new multi-family housing and fewer new single-family houses.

We cannot afford to have the worst performance of any region in the state. A poor Sustainable Communities Strategy will hurt state and federal grant funding, which is increasingly awarded on a competitive performance-oriented basis. You all can do better than this, and you should. Please have staff develop a scenario that meets the greenhouse gas reduction targets for consideration by the board. Everyone in Madera County needs this and is counting on all of you to take positive action now.

Thank you.

Trudy Tucker
P. O. Box 788
Coarsegold, CA 93614-0788
trudyt@cvip.net



PO Box 102, Cressey, California, 95312

To Madera County Transportation Commission

dylan@maderactc.org

Re: Regional Transportation Plan/Sustainable Communities Strategy and Environmental Impact Report comments due June 26, 2014

Dear Mr. Dylan,

The Valley Land Alliance is a non-profit organization with a mission to educate and build alliances to protect our uniquely productive California Central Valley farmland.

Our comments regarding your Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) are being made in response to the need for reduction of greenhouse gas emissions (GHG) which are detrimental to the health of all living in our Valley. Recognizing that automobiles are a major GHG source, planning where we put people influences what quality of air we will have to live.

#A

How do you plan to reduce the Vehicle Miles Traveled (VMT)? Under SB 375 the San Joaquin Valley counties need to reduce per-person VMTs by 5% by 2020 and 10% by 2035.

How do you plan to address the need for affordable, multi-family housing?

#B

Unfortunately Madera and Merced Counties appear to be the only two counties in our Valley which will not meet this target under their proposed plans.

We request the planning be reviewed and amended to provide opportunities for people living here to see the State required reduction of greenhouse gas emissions in Madera County and beyond.

Sincerely,

Jean Okuye
Vice President Valley Land Alliance
209-394-2421



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Received

June 17, 2014

JUN 23 2014

Dylan Stone
Madera County Transportation Commission
2001 Howard Rd., Ste. 201
Madera, CA 93637

Madera CTC

Subject: MCTC 2014 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
SCH#: 2012111025

Dear Dylan Stone:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 16, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report State Clearinghouse Data Base

SCH# 2012111025
Project Title MCTC 2014 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
Lead Agency Madera County Transportation Commission

Type EIR Draft EIR

Description The project, as defined pursuant to Public Resources Code, Section 21065, is the preparation of the 2014 RTP and SCS. MCTC is in the process of preparing the RTP/SCS as required by Section 65080 et seq., of Chapter 2.5 of the CA Government Code, federal guidelines pursuant to new requirements established in the federal surface transportation reauthorization, "Moving Ahead for Progress in the 21st Century" (MAP-21), the Transportation Conformity for the Air Quality Attainment Plan per 40 CFR Part 51 and 40 CFR Part 93, and requirements set forth in Assembly Bill 32, The CA Global Warming Solutions Act of 2006, and Senate Bill 375 The Sustainable Communities and Climate Protection Act of 2008. Finally, the CA Transportation Commission has prepared guidelines (most recently adopted by the CTC on April 7, 2010) to assist in the preparation of the RTP and SCS.

Lead Agency Contact

Name Dylan Stone
Agency Madera County Transportation Commission
Phone 559-675-0721 **Fax**
email
Address 2001 Howard Rd., Ste. 201
City Madera **State** CA **Zip** 93637

Project Location

County Madera
City Madera, Chowchilla
Region
Lat / Long
Cross Streets
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways SR 99 & Others
Airports Madera & Others
Railways UP & BNSF
Waterways San Joaquin & Others
Schools Various
Land Use

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 4; Cal Fire; Department of Parks and Recreation; Office of Emergency Services, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 6; Caltrans, Division of Transportation Planning; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 5 (Fresno); Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 05/01/2014 **Start of Review** 05/01/2014 **End of Review** 06/16/2014

DEPARTMENT OF TRANSPORTATION

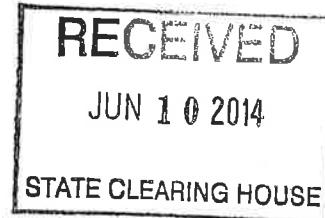
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June 9, 2014



Ms. Patricia Taylor
Executive Director
Madera County Transportation Commission
2001 Howard Road, Suite 201
Madera, CA 93637

Dear Ms. Taylor:

Thank you for the opportunity to review the Madera County Transportation Commission (MCTC) Draft 2014 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). Caltrans, at District 6 and various divisions within the Department, have reviewed the Draft RTP/SCS, EIR, Evaluation Criteria/Safety and collectively offer the following comments:

DISTRICT 6:

Transportation Planning

MCTC is commended for their efforts at striving to develop a guide that identifies transportation strategies that will improve mobility through 2040, while working towards reducing greenhouse gas (GHG) emissions to state-mandated levels over time and the negative environmental impacts of travel.

MCTC highly encourages public participation and involvement from their citizens, public agencies and local partners to address transportation goals and strategies. MCTC is commended for utilizing several public forums to reach out to the public.

MCTC is commended for their efforts to support public transportation through its public transit system. Madera County public transit system includes: Madera Area Express fixed-route and Dial-a-Ride, Madera County Connection, Eastern Madera Senior Bus, Escort Program, Chowchilla Area Transit Express, CatLinx, specialized social service transportation services, Greyhound, and taxi services. MCTC is also commended on specialized transportation for meeting the needs of the elderly population (Eastern Madera Senior Bus).

MCTC is commended for reserving a portion of its Local Transportation Funds (LTF) for the support and construction of new bicycle and pedestrian facilities.

MCTC has identified goals to guide their pursuit of quality growth and a highly integrated transportation system. These goals are meant to promote intermodal transportation systems that

Ms. Patricia Taylor
June 9, 2014
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encourage and stimulate the intermodal connectivity and movement of people and goods; to improve the transportation network by providing reliable transportation, protecting the environment, and improving the health of residents through multi-modal programs. MCTC's 2014 RTP/SCS document is meant to serve as a blueprint for addressing the current and future needs of an intermodal transportation network that will serve the community well. The following comments are offered for review:

Chapter 1.0 THE 2014 RTP AND SCS – A SUMMARY:

- Page 1-21: Environmental Justice Communities could be added to the list for which extensive efforts were made to achieve consultation and coordination.

Chapter 5.0 DELIVERING THE PLAN FOR CHANGE:

- Page 5-6 under Highway Arterial Performance: On June 20, 2013, Caltrans expressed concerns related to the methodology for establishing Benefit/Cost Ratio and scoring criterion for improved Level-of-Service (LOS) criteria and the qualitative evaluation criteria related to safety improvement. Caltrans requested to review the scoring formula for the evaluation criteria, the criteria used for all capacity increasing projects and how criteria affects the ranking of projects on the State highway system. The requests by Caltrans have not been accommodated. These previous questions remain unanswered and should be addressed.
- Page 5-26 under Mass Transportation, Other Accomplishments, Bus Service from Fresno-Madera to Yosemite National Park: There should be some mention of the general outcome of the feasibility study of bus service from Madera and Fresno to Yosemite National Park.
- Page 5-26 under Mass Transportation, Other Accomplishments, Short Range County-Wide Transportation Needs: There should be some mention of when MCTC plans to update the Madera County Short Range Transit Plan.
- Page 5-42 Bicycle and Trail Improvements, 3rd Bullet: MCTC should investigate if there is a need to update the Madera County 2004 Bicycle Transportation Plan as well as bicycle plans for other jurisdictions within Madera County in light of the availability of Active Transportation Program funding.
- Page 5-42 Bicycle and Trail Improvements, Goals: Caltrans recommends that MCTC add a goal for the development of an Active Transportation Plan to define strategies to secure Active Transportation Program funding. Updated bicycle plans and assessment of previously funded Caltrans Environmental Justice and Community Based Transportation Planning Grant projects can provide the foundation for an Active Transportation Plan.

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 June 9, 2014
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Chapter 10.0 ADDRESSING ENVIRONMENTAL JUSTICE

- Page 10-1 Addressing Environmental Justice: Caltrans commends MCTC for including a section on Environmental Justice within the MCTC RTP. Caltrans recommends a similar section to address consultation and coordination with tribal governments and communities to document efforts MCTC has and will continue to conduct in this capacity. Another recommendation is the development of an Environmental Justice committee or task force. Outreach to Environmental Justice communities, tribal governments and communities is already taking place but the creation of a committee would formalize and allow for better documentation of the efforts.
- Page 10-1 Addressing Environmental Justice, How Transportation Investment Affects Communities: There are efforts being accomplished by the North Fork Rancheria Tribe that can be included in this section. These efforts include the development of the tribe's transportation center and transit services. There may be efforts that have been conducted by the Picayune Rancheria of Chukchansi Indians that can be documented. Also note the previous comments on the need for a section on consultation and coordination with tribal governments and communities. Information on CalVans could also be added to this section.
- Page 10-5 Equity Analysis, American Indians and Alaskan Natives: MCTC should review the U.S. Department of Transportation Order 561.0.2(a), Final DOT Environmental Justice Order- May 10, 2012 for the updated definition which reads, "(4) American Indian and Alaskan Native: A person having origins in any of the original people of North, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or (5) Native Hawaiian and Other Pacific Islander: people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands."

The following comments address the RTP/SCS Project Evaluation Criteria:

Previous comments were made on the RTP/SCS Project Evaluation Criteria in June of 2013 which have not been completely addressed with regards to the Evaluation Criteria, Safety. Caltrans' comments indicate that the ranking of the listing order plays some part in the weight of that category's score. There should be some weighted formula applied besides just adding up the points in each category. This should be submitted to Caltrans for review. Caltrans had previously asked for this scoring formula but it has not been supplied. MCTC increased the scoring range for safety from 1-4 to 2-8 (giving the appearance of being doubled); however, MCTC did not move up the Safety category to a position further up the ranking list and it still remains at rank 3. Safety should be as high a priority to the locals as it is to Caltrans.

In the earlier submittal of the RTP/SCS Project Evaluation Criteria there was the appearance of a separate scoring method/criteria for interchange projects. The current submittal does not contain a separate scoring method, it will be assumed that MCTC is applying the same criteria to all "capacity increasing" projects. This would be fine however there is no presence of a ranking order of constrained

Ms. Patricia Taylor
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projects in this submittal or in the prior submittal. It cannot be discerned whether projects on State facilities have moved up in rank from the last submittal with the new criteria.

Prior comments suggested a modification of jobs/housing balances in the "mountainous regions". Caltrans cannot locate the previous figures to compare with any new figures to ascertain whether this modification has been implemented.

Office of Traffic Operations

The RTP document relied on the use of the MCTC Traffic Model as the method for analyzing a roadway segment's existing LOS. While the model could be effective in developing a LOS over a broad roadway system, the model appears to lack sufficient analysis capability to accurately analyze a specific roadway segment. The type of facility, peak-hour factor, grade of terrain, lane width, lateral clearance, number of access points, median type, amount of heavy vehicles, or type of driver population were not taken into consideration in the LOS determination. In Chapter 2, the RTP (The Existing Transportation System, Level of Service, page 2-9) cites that the 2010 Highway Capacity Manual (HCM) categorizes two parameters of traffic in regards to LOS, uninterrupted and interrupted flow; however, it fails to explain how this relates to the RTP's LOS analysis.

The results of the RTP's existing LOS segment analysis were shown on Figure 2-3 (page 2-11) which is an insufficiently labeled roadway map of Madera County. Figure 2-3 fails to suitably identify segments that operate with an unsatisfactory LOS. Furthermore, the RTP goes on to state on page 2-10 that "Results of the LOS analysis indicate that two (2) segments along the Regionally Significant Flood System are currently operating at LOS "D" through "F" for State Routes..." when there are actually three segments shown along State Route (SR) 41 indicated on the Figure 2-3. The general locations of the segments with unsatisfactory LOS, in mountainous and rolling terrain along SR 41 and none located on the heavily traveled urban segments of SR 41 and SR 99, brings into question the accuracy of the analysis. It is thus recommended that the results of the MCTC Traffic Model's existing LOS analysis should be verified with an analysis, using conventionally collected data, performed in accordance with the 2010 HCM.

The results of the RTP's existing LOS segment analysis contradict recent Caltrans operational studies of SRs 41 and 99. For example, a recent project study report determined that SR 99, from Avenue 12 to Avenue 17, had an existing LOS D. Also, a recent operational analysis determined that SR 41 had an existing LOS D, or worse, from Avenue 12 to Road 208.

A review of Exhibits 5-5 through 5-8 indicates that only some of the segments on SR 41 and a small portion of SR 99 are projected to operate with unsatisfactory LOS by the Year 2040. Nonetheless, the RTP (Major Corridor Deficiencies, Needs, Actions, page 5-17) acknowledges deficiencies along SRs 41 and 99, and discusses potential improvements. The RTP's discussion is thus at odds with the LOS results provided on Exhibits 5-5 through 5-8. These 2040 LOS segment analysis results also contradict Caltrans operational studies, as previously stated.

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In MCTC's 2011 RTP, virtually all of the segments on SRs 41, 49, and 99 were projected to operate with unsatisfactory LOS by the Year 2035 (2011 RTP Exhibits 4-4A and 4-4B). The segments of SR 145 that are situated east of SR 99 were also projected to operate with an unsatisfactory LOS by 2035. The LOS analysis from the 2011 RTP is consistent with what Caltrans would expect from SRs 41 and 99 in Year 2040 without improvement.

In the Ramp Metering topic on page 5-20, the RTP states "Caltrans, through its correspondence with the County Road Department, has indicated that it intends to meter all on-ramps to State routes in such a manner to mimic traffic patterns in the Year 2000." This statement should be removed or modified. Caltrans does not recommend metering all ramps or setting metering rates to blindly mimic traffic patterns of the Year 2000.

The RTP's LOS segment analysis, the basis of this document's roadway study, is obviously significantly flawed. Thus, in its current form, it is not a reliable guide for the future needs of the roadway transportation system of Madera County. The analysis needs to reflect what the existing conditions are on State routes, be reasonably consistent with the findings of recent Caltrans studies, and support the discussion provided in the RTP itself.

HEADQUARTERS:

Division of Transportation Planning: Office of Regional & Interagency Planning (ORIP)

The Office of Regional and Interagency Planning, Regional Planning Branch has completed its review of MCTC's Draft 2014 RTP. We thank you for the opportunity to review and provide comments on the RTP. We offer comments, suggestions, and questions on the following sections:

- RTP Checklist: The checklist must be signed and should reference item locations in the body of the RTP and give page numbers whenever possible.
- MCTC should consider Climate Change or Adaptation related projects. Flooding or extreme heat events could both have negative impacts on the State Highway System, as well as local county roads and city streets.
- Clarify that the RTP is coordinated with and consistent with the Public Transit-Human Services Plan.
- Pages 1-17 and 6-2: Senate Bill (SB) 375, the Sustainable Communities and Climate Protection Act of 2008 was signed into law on September 30, 2008. This should be corrected in the RTP.
- Pages 1-19 and 7-2: Provide a brief explanation as to why it is assumed that Measure T will continue (beyond 2027 to 2040) and that the RTP will continue to be financially constrained.
- Page 7-6: A \$287 million shortfall is anticipated if Measure T is not renewed. Briefly describe what steps are being taken to renew Measure T.

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- It is understood, according to the draft RTP, that MCTC will not meet the 2020 5% or the 2035 10% Green House Gas (GHG) emission reduction Targets set by the California Air Resources Board (ARB). It is also understood that MCTC continues to work with ARB in this process, and is also in the process of developing an Alternative Planning Strategy (APS) to meet the requirements of SB 375. The APS timeline continues to be developed, but has not yet been finalized.

Division of Aeronautics

The Division of Aeronautics thanks MCTC for the opportunity to comment on the Draft RTP and SCS for 2014. After completion of a thorough review, the division of Aeronautics offers the following comments:

- Page 1-6 under Aviation: The first sentence states that the Madera County Municipal Airport provides services to approximately 88 Fixed-Based Operators (FBOs). This figure appears to be large for this airport. A FBO is a commercial business granted the right by an airport to operate on the airport and provide aeronautical services such as fueling, hangaring, tie-down and parking, aircraft rental, aircraft maintenance, flight instruction, etc. Additionally, it is stated that the Chowchilla Municipal Airport has 18 FBOs, which also appears to be a large number for this airport.
- Page 1-14 under Goods Movement Needs and Actions: The last sentence states that "while air cargo operations at the Chowchilla and Madera Municipal Airports are desirable, the feasibility of transporting goods by air is questionable." There should be a follow-up explanation to this statement as to why transporting goods by air is questionable.
 - According to the California Aviation System Plan Policy Element http://www.dot.ca.gov/hq/planning/aeronaut/documents/casp/policy_element_online.pdf, *Redefining airports as potential employment centers and air cargo as a specialized form of goods movement is necessary to dispel the misconception that airports are simply a place for commercial passenger arrivals and departures. The perception that airports are just places for airplanes to take-off and land has long been dismissed by aviation system planners. Instead, airports should more accurately be viewed as economic enterprise hubs, employment centers, mixed-use commercial business centers, bulk cargo transfer centers, transit hubs, and more. General Aviation (GA) airports could serve cargo transfers from both small planes and trucks. Such efforts can further develop air cargo and other bulk-transfer markets, provide needed revenues to the airport, and reduce intra-city truck trips, thus relieving congestion and improving air quality.*
- Page 5-34 under Aviation: The first paragraph, last sentence states, "These improvements have been identified to address aviation system needs described in the *Regional Aviation System Plan* prepared by MCTC in June 1994." This reference to a document that is 20 years old should be

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referencing the 2011 updated document. Also, the following website has updated needed airport improvements for reference: [http://www.mtc.ca.gov/planning/air_plan/RASP\)FinalReport.pdf](http://www.mtc.ca.gov/planning/air_plan/RASP)FinalReport.pdf).

- Page 5-34 under Aviation System Needs and Actions:
 - The second bullet refers to future activity to include “review and revise the Airport Master Plans.” We commend MCTC for this. Refer to Advisory Circular: AC No: 150/5070-6B Airport Master Plan Guidelines for assistance in this process.
 - The seventh bullet states, “support expansion of capital improvement funds and sources for rural airports.” Refer to Caltrans’ website for possible funding sources: <http://www.dot.ca.gov/hq/planning/aeronaut/#>.
- Page 5-36 under Airport Land Use Commission (ALUC): The second paragraph states that the ALUC has developed the *Madera County Comprehensive Airport Land Use Plan* but it does not indicate what year. A year of completion or adoption should be inserted at this location.

If you have any questions concerning the comments provided, please call me at (559) 488-7307.

Sincerely,



JENNIFER BRYAN-SANCHEZ
Transportation Planning North Branch
District 6

C: Gail Miller, Michael Navarro, Jacqueline Hodaly, Marta Frausto, Lorena Mendibles, and Albert Lee of Caltrans
Ray Sukys, Eric Eidlin of FTA
Jack Lord, Scott Carson of FHWA

MAD-GEN

Print Form

Appendix C

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 Tenille Street, Sacramento, CA 95814

SCH # 2012111025

Project Title: Draft Program EIR for the Draft 2014 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

Lead Agency: Madera County Transportation Commission
Mailing Address: 2001 Howard Road, Ste. 201
City: Madera
County: Madera

Project Location: County: Madera
City/Nearest Community: Madera & Chowchilla
Zip Code:

Cross Streets:
Longitude/latitude (degrees, minutes and seconds):
Assessor's Parcel No.:

Section:
Waterways: San Joaquin River, Fresno River, & Others
Railways: UPRR, BNSF
Schools: Numerous

Document Types:
CEQA: [] NOP [] Draft EIR [] Supplemental/Amended EIR
[] Early Cons [] Neg Dec [] Mit Neg Dec
Other: [] Joint Document [] Final Document [] Other:

Local Action Type:
[] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prozone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc.) [] Other: RTP/SCS

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

Project Issues Discussed in Document:
[] Aesthetic/Visual [] Fiscal [] Recreation/Parks [] Vegetation
[] Agricultural Land [] Flood Plain/Flooding [] Schools/Universities [] Water Quality
[] Air Quality [] Forest Land/Fire Hazard [] Septic Systems [] Water Supply/Groundwater
[] Archeological/Historical [] Geology/Seismic [] Sewer Capacity [] Wetland/Riparian
[] Biological Resources [] Minerals [] Soil Erosion/Compaction/Grading [] Growth Inducement
[] Coastal Zone [] Noise [] Solid Waste [] Land Use
[] Drinking/Absorption [] Population/Housing Balance [] Toxic/Hazardous [] Cumulative Effects
[] Economic/Infa [] Public Services/Facilities [] Traffic/Circulation [] Other: ENERGY

Present Land Use/Zoning/General Plan Designation:

Project Description: (please use a separate page if necessary)
The 2014 RTP and SCS identifies the Madera region's transportation needs and issues, sets forth an action plan of projects and programs to address the needs consistent with a set of goals and policies, and documents the financial resources to implement the plan. The 2014 RTP and SCS also includes a Sustainable Communities Strategy (SCS) prepared to address requirements set forth in California Senate Bill (SB) 375, which requires that MCTC prepare an SCS that provides an integrated land use and transportation plan for meeting greenhouse gas emission reduction targets set forth by the California Air Resources Board (CARB).

NG

State Clearinghouse Contact: (916) 445-0613

State Review Begins: 05-01-2014

SCH COMPLIANCE 06-14-2014

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2012111025
Please forward late comments directly to the Lead Agency

AQMD/APCD 15
(Resources: 15/152)

Project Sent to the following State Agencies

- Resources
Boating & Waterways
Coastal Comm
Colorado Rvr Bd
Conservation
CDFW # 4
Delta Protection Comm
Cal Fire
Historic Preservation
Parks & Rec
Central Valley Flood Prot.
Bay Cons & Dev Comm.
DWR
OES
Resources, Recycling and Recovery
Res Transp Hou
Aeromuties
CHP
Caltrans # 10
Trans Planning
Housing & Com Dev
Food & Agriculture
Public Health
State/Consumer Svcs
General Services
Cal EPA
ARB: All Projects
ARB: Transportation Projects
ARB: Major Industrial Projects
SWRCB: Div. Financial Assist.
SWRCB: Wtr Quality
SWRCB: Wtr Rights
Reg. WQCB # 5E
Toxic Sub Ctrl-CTC
Yth/Adlt Corrections
Corrections
Independent Comm
Energy Commission
NATC
Public Utilities Comm
State Lands Comm
Tahoe Reg Plan Agency
Conservancy
Other:

Please see attached comment letter
[Signature]

SECTION 3.0 CHANGES, ADDITIONS, AND CORRECTIONS TO THE DRAFT PEIR

In response to the comments received and responses included in Chapter 2 of this Final PEIR, MCTC recommends the following changes to the Draft PEIR.

- ✓ **Executive Summary, Pages 1-10 through 1-11, Table 1-1, Impact 3.2.3**, Mitigation Measures, 2nd, 3rd, 4th bullets: Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-11, Table 1-1, Impact 3.3.1**, Mitigation Measures, 1st bullet, 1st line, replace “may desire to” with “will”.
- ✓ **Executive Summary, Page 1-12, Table 1-1, Impact 3.3.1**, Mitigation Measures, 2nd, 3rd, 4th bullets: Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-12, Table 1-1, Impact 3.3.2**, Mitigation Measures, 1st bullet, 1st line, replace “may desire to” with “will”.
- ✓ **Executive Summary, Pages 1-12 through 1-13, Table 1-1, Impact 3.3.2**, Mitigation Measures, 2nd, 3rd, 4th, 6th, 7th bullets: Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-13, Table 1-1, Impact 3.3.3**, Mitigation Measures, 1st bullet, 1st line, replace “may desire to” with “will”.
- ✓ **Executive Summary, Page 1-14, Table 1-1, Impact 3.3.3**, Mitigation Measures, 2nd, 3rd, 4th, 6th, 7th bullets: Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-15, Table 1-1, Impact 3.4.4**, 1st bullet, Mitigation Measures, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-16, Table 1-1, Impact 3.4.5**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-16, Table 1-1, Impact 3.5.1**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-16, Table 1-1, Impact 3.5.1**, Mitigation Measures, 2nd bullet, 3rd line, remove the word “jurisdictional”.
- ✓ **Executive Summary, Page 1-16, Table 1-1, Impact 3.5.1**, Mitigation Measures, 5th bullet, 2rd line, remove the word “jurisdictional”.

- ✓ **Executive Summary, Page 1-19, Table 1-1, Impact 3.5.5**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-19, Table 1-1, Impact 3.5.6**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-20, Table 1-1, Impact 3.6.1**, Mitigation Measures, 3rd bullet “Continue Development of a SCS Funding Program” add the following paragraph to the bullet:

MCTC will immediately form an SCS Funding Program Committee or Task Force to define the program and process for funding allocation. At a minimum, the task force or committee will identify the SCS Funding Program project evaluation criteria necessary to evaluate the potential of transportation and other projects to:

- *Reduce GHG and air emissions*
 - *Reduce VMT*
 - *Reduce vehicle trips*
 - *Reduce vehicle hours of delay and idling*
 - *Increase transit trips*
 - *Increase walkability*
 - *Increase bike trips*
 - *Support alternative modes or active transportation programs and services*
 - *Identify other criteria that enables the task force or committee to clearly identify reductions in GHG emissions locally or on a regional basis*
- ✓ **Executive Summary, Pages 1-24 through 1-25, Table 1-1, Impact 3.8.1**, Mitigation Measures, 3rd, 4th, 5th, 6th, 7th, 8th, 9th bullets, Replace “should” with “will”.
 - ✓ **Executive Summary, Page 1-26, Table 1-1, Impact 3.9.3**, Mitigation Measures, 2nd bullet, Replace “should” with “will”.
 - ✓ **Executive Summary, Page 1-26, Table 1-1, Impact 3.9.4**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
 - ✓ **Executive Summary, Page 1-27, Table 1-1, Impact 3.9.5**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
 - ✓ **Executive Summary, Page 1-28, Table 1-1, Impact 3.10.3**, Mitigation Measures, 3rd bullet, Replace “should” with “will”.
 - ✓ **Executive Summary, Page 1-28, Table 1-1, Impact 3.10.5**, Mitigation Measures, 1st bullet, Replace “should” with “will”.

- ✓ **Executive Summary, Page 1-28, Table 1-1, Impact 3.10.6**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-29, Table 1-1, Impact 3.10.7**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-29, Table 1-1, Impact 3.10.8**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Pages 1-29 through 1-30, Table 1-1, Impact 3.11.1**, Mitigation Measures, 3rd, 4th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-30, Table 1-1, Impact 3.11.2**, Mitigation Measures, 2nd bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Pages 1-30 through 1-31, Table 1-1, Impact 3.11.3**, Mitigation Measures, 1st, 2nd, 3rd, 4th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-32, Table 1-1, Impact 3.11.4**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Pages 1-32 through 1-33, Table 1-1, Impact 3.11.5**, Mitigation Measures, 1st, 2nd, 3rd, 4th, 5th, 6th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-33, Table 1-1, Impact 3.11.7**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-35, Table 1-1, Impact 3.12.3**, Mitigation Measures, 2nd bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-35, Table 1-1, Impact 3.12.4**, Mitigation Measures, 2nd, 4th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Pages 1-35 through 1-36, Table 1-1, Impact 3.13.1**, Mitigation Measures, 2nd, 4th, 7th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-35, Table 1-1, Impact 3.13.1**, Mitigation Measures, 2nd bullet, 1st line, remove the word “jurisdictional”.
- ✓ **Executive Summary, Page 1-36, Table 1-1, Impact 3.13.2**, Mitigation Measures, 2nd, 4th, 7th bullets, Replace “should” with “will”.

- ✓ **Executive Summary, Page 1-36, Table 1-1, Impact 3.13.2**, Mitigation Measures, 2nd bullet, 1st line, remove the word “jurisdictional”.
- ✓ **Executive Summary, Page 1-37, Table 1-1, Impact 3.13.3**, Mitigation Measures, 4th, 7th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-37, Table 1-1, Impact 3.13.3**, Mitigation Measures, 2nd bullet, 1st line, remove the word “jurisdictional”.
- ✓ **Executive Summary, Page 1-39, Table 1-1, Impact 3.14.1**, Mitigation Measures, 1st bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.

- ✓ **Executive Summary, Page 1-39, Table 1-1, Impact 3.14.2**, Mitigation Measures, 1st bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.

- ✓ **Executive Summary, Page 1-39, Table 1-1, Impact 3.14.2**, Mitigation Measures, 3rd bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-41, Table 1-1, Impact 3.15.2**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-42, Table 1-1, Impact 3.15.4**, Mitigation Measures, 1st, 3rd bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-43, Table 1-1, Impact 3.15.5**, Delete the following mitigation measure:
 - Recently, the Governor declared an emergency drought declaration for the State. Long-term water supply documents anticipate that drought (including severe single-year drought) are regular occurrences within the State. Because the 2014 RTP and SCS do not propose or approve any development of any water demand projects, the Governor’s drought declaration does not indicate that there is a significant water supply impact associated with the RTP and SCS.

- ✓ **Executive Summary, Page 1-34, Table 1-1, Impact 3.17.1**, Mitigation Measures, 1st bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.

- ✓ **Executive Summary, Page 1-44, Table 1-1, Impact 3.15.8**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Pages 1-44 through 1-50, Table 1-1, Impact 3.17.1**, Mitigation Measures, 6th, 10th through 47th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Pages 1-50 through 1-53, Table 1-1, Impact 3.17.2**, Mitigation Measures, 1st, 2nd through 7th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-53, Table 1-1, Impact 3.17.4**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Executive Summary, Pages 1-54 through 1-55, Table 1-1, Impact 3.17.6**, Mitigation Measures, 1st, through 7th bullets, Replace “should” with “will”.
- ✓ **Executive Summary, Page 1-55, Table 1-1, Impact 3.17.7**, Mitigation Measures, 1st bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.
- ✓ **Chapter 2, Section 2.5, Page 2-28, Table 2-3**, Project 60, SR 99 Avenue 12 to Avenue 17, change the Project Opening Year from “2025” to “2020”.
- ✓ **Chapter 3, Section 3.2, Aesthetics, Pages 3-16 through 3-17, Impact 3.2.3**, Mitigation Measures, 2nd, 3rd, 4th bullets: Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.3, Agriculture, Page 3-33, Impact 3.3.1**, Conversion of important farmland or forest/timber lands, add the following to the end of the section:

Specifically, the RTP and SCS will consume approximately 1,233 acres of natural resource lands resulting from new land use development. Transportation projects also have the potential to consume natural resource lands. While the exact amount of land consumed by transportation projects is unknown given the lack of specific data needed to quantify such impacts, approximately 182 lane miles of expanded roadway is expected to occur as a result of implementation of the RTP and SCS.

- ✓ **Chapter 3, Section 3.3, Agriculture, Page 3-33, Impact 3.3.1**, Mitigation Measures, 1st bullet, 1st line, replace “may desire to” with “will”.
- ✓ **Chapter 3, Section 3.3, Agriculture, Page 3-34, Impact 3.3.1**, Mitigation Measures, 2nd, 3rd, 4th bullets: Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.3, Agriculture, Pages 3-35 through 3-36, Impact 3.3.2**, Mitigation Measures, 3rd, 4th bullets: Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.3, Agricultural Resources, Page 3-37**, place the following paragraphs at the impacts section:

The linear length in lane miles has been identified as a change to the Draft PEIR in Chapter 3 to this Final PEIR. The linear length in lane miles associated with new or expanded transportation improvements is 182 (lane miles added between 2010 and 2040). All project alternatives (except the No Project) have the same set of improvement projects. As a result, there are no differences in terms of impacts among the alternatives studied. The linear lane miles associated with the No Project alternative is 188 (lane miles added between 2000 and 2035). For purposes of the analysis, it is not possible to accurately reflect the amount of agricultural land or resource lands that would be impacted by new or expanding transportation improvement projects. There are a number of key factors that must be considered in order to make such a calculation including, but not limited to the following:

- Amount of Right-of-way (ROW already acquired by the affected local agency or Caltrans
- Amount of ROW impacting agricultural operations vs. vacant of any use
- How wide the expanded or new facility will be
- Whether traveler safety is an issue that would require wider lanes, shoulders or median treatments
- The need for truck acceleration and deceleration lanes
- Extent of intersection improvements
- Bike lane requirements, lane type and width
- Pedestrian and streetscape improvements
- Provision for parking and type of parking
- Need for bus turnouts
- Staging area requirements
- Location of utility easements and relocation

- Road alignment
- The need for roundabouts now required along Caltrans facilities where warranted – require more ROW
- The need for passing lanes
- The need for continuous left turn lanes
- Other turn lanes
- The extent of drainage facilities and culverts
- Bridge requirements and footprint
- Overcrossing and undercrossing requirements and footprint
- Other considerations

While other MPOs may have estimated the impact of new facilities on agricultural operations, the estimates are rough considering the above. The exact extent of agricultural land impact by type of farmland can only be known once design plans and environmental review of each individual transportation improvement project is complete. It is not possible at the regional scale of the MCTC 2014 RTP and SCS PEIR. As such, mitigation measures to be carried out by those agencies responsible for implementing RTP and SCS transportation improvement projects are included in the Draft PEIR and will reduce the severity of potential significant impacts if they are carried out in accordance with the measures noted. The extent to which the measures will be effective can only be determined as environmental documents are prepared for individual improvement projects.

✓ **Chapter 3, Section 3.4, Air Quality, Page 3-43, Table 3-4,** include data source, “California Air Resources Board (6/4/2013)”.

✓ **Chapter 3, Section 3.4, Air Quality, Page 3-49,** under the subsection titled “Regional Agencies”, replace the 4th paragraph with the following:

The SJVAPCD has prepared the 2013 Ozone Plan to achieve Federal and State standards for improved air quality in the SJVAB regarding ozone. The 2013 Ozone Plan provides a comprehensive list of regulatory and incentive-based measures to reduce emissions of ozone and particulate matter precursors throughout the SJVAB. The 2013 Ozone Plan calls for major advancements in pollution control technologies for mobile and stationary sources of air pollution. The 2013 Ozone Plan calls for a 75-percent reduction in ozone-forming oxides of nitrogen emissions. The 2013 Ozone Plan also addresses the remaining requirement under the 1979 revoked 1-hour ozone NAAQS.

✓ **Chapter 3, Section 3.4, Air Quality, Page 3-49,** under the subsection titled “Regional Agencies” remove all references to the 2008 PM_{2.5} Plan and add reference to the 2012 PM_{2.5} plan.

✓ **Chapter 3, Section 3.4, Air Quality, Pages 3-50 to 3-51,** Tables 3-5, 3-6, and 3-7, and the following citation to document the source for the data provided:

“Conformity Analysis 2015-2018 FTIP/2014 RTP”

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-54**, under the subsection titled “Other Air Quality Determinants”, replace the 1st sentence in the 2nd paragraph with the following:

Carbon monoxide emissions overwhelmingly come from mobile sources in the San Joaquin Valley; on-road vehicles contributed 34 percent, while other mobile vehicles, such as trains, planes, and off-road vehicles, contributed another 20 percent in 2012 according to emission projections from the ARB.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-54**, under the subsection titled “Other Air Quality Determinants”, replace the 3rd paragraph with the following:

Ozone is the result of a photochemical reaction between Oxides of nitrogen (NO_x) and Reactive Organic Gases (ROG). Mobile sources contribute 83 percent of all NO_x emitted from anthropogenic sources based on data provided in Appendix I of the Air District’s 2013 Ozone Plan. In addition, mobile sources contribute 22 percent of all the ROG emitted from sources within the San Joaquin Valley.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-54**, under the subsection titled “Other Air Quality Determinants”, replace the 6th paragraph with the following:

The primary contributors of PM₁₀ emissions in the San Joaquin Valley are farming activities (29%) and road dust, both paved and unpaved (24%) in 2012 according to emission projections from the ARB. Fugitive windblown dust from “open” fields contributed 14 percent of the PM₁₀.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-58**, under the subsection titled “San Joaquin Valley Air Basin Monitoring”, replace the 2nd paragraph with the following:

Tables 3-12 and 3-13 reflect the ambient air quality classifications for monitoring sites in Madera County. Table 3-14 identifies Madera County’s attainment status, which can be located on the District’s website at: valleyair.org/aqinfo/attainment.htm. As indicated, Madera County is nonattainment for Ozone (1 hour and 8 hour) and PM under the State standard. In accordance with the FCAA, EPA uses the design value at the time of standard promulgation to assign nonattainment areas to one of several classes that reflect the severity of the nonattainment problem; classifications range from marginal nonattainment to extreme nonattainment. The FCAA contains provisions for changing the classifications using factors such as clean air progress rates and requests from States to move areas to a higher classification.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-60**, Table 3-13, make the following changes: Under Ozone – 8 hour, revise State Standard from “No State Standard” to “*Nonattainment*”; Under Carbon Monoxide, revise State Standard from “Unclassified” to “*Unclassified/Attainment*”; Under Sulfur Dioxide, revise Federal Standard from “Unclassified” to “*Unclassified/Attainment*”; Under Lead (Particulate), revise Federal Standard from “Unclassified/Attainment” to “*No Designation/Classification*”.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-64**, under the subsection titled “Suspended PM”, revise the 1st sentence in the 3rd paragraph with the following:

The District’s 2008 PM_{2.5} Plan builds upon the aggressive emission reduction strategy adopted in the 2007 Ozone Plan and strives to bring the valley into attainment status for the 1997 NAAQS for PM_{2.5}.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-74**, under the subsection titled “Impact 3.4.1”, replace the 1st sentence in the 1st paragraph with the following:

The following analysis is a summary of the Conformity Analysis for the 2015-2018 FTIP and the 2014 RTP and SCS.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-76**, Impact 3.4.1, under the subsection titled “Madera County Conformity Tests”, replace the 1st sentence of the 7th paragraph with the following:

For PM_{2.5}, the attainment year for the 1997 NAAQS is 2015 based on data from 2012-2014. The attainment year for the 2006 NAAQS is 2015 based on data from 2013-2015.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-77**, Table 3-17, for the 1997 and 2006 PM_{2.5} NAAQS, revise NO_x emission budget from 2014 from “8.5” to “8.1”.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-80**, 1st paragraph, 1st line, replace “2014 FTIP” with “2015-2018 FTIP”.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-82**, under the subsection titled “Results of the Analysis”, replace the 3rd sentence of the 3rd paragraph with the following:

Results of the analysis show that PM₁₀ emissions will slightly increase from 0.35 tons per day to 0.36 tons per day.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-84**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “*implementing*”.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-85**, under the subsection titled “Impact 3.4.3”, replace the 1st sentence with the following:

Madera County is nonattainment for Ozone (1 hour and 8 hour) and PM_{2.5} and is maintenance area for PM₁₀”.

- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-111**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-112, Impact 3.4.4**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.4, Air Quality, Page 3-112, Impact 3.4.5**, Mitigation Measures, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Page 3-114**, change the section heading from “3.4” to “3.5”.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Pages 3-131 through 3-141**, change Impact numbering from 3.4.1 through 3.4.7 to “3.5.1 through 3.5.7”.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Page 3-132**, Impact 3.5.1, Mitigation Measures, 1st paragraph, 1st line, remove the word ‘jurisdictional’.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Page 3-132, Impact 3.5.1**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Page 3-132**, Impact 3.5.1, Mitigation Measures, 2nd bullet, 3rd line, remove the word ‘jurisdictional’.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Page 3-133**, Impact 3.5.1, Mitigation Measures, 2nd bullet, 2nd line, remove the word ‘jurisdictional’.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Page 3-133**, Impact 3.5.1, Significance after Mitigation, 1st paragraph, 5th line, remove the word ‘jurisdictional’.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Page 3-139, Impact 3.5.5**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.5, Biotic Resources, Pages 3-140 and 3-141, Impact 3.5.6**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.6, Climate Change, Page 3-168**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.

- ✓ **Chapter 3, Section 3.6, Page 3-169, Impact 3.6.1,** Mitigation Measures, 3rd bullet “Continue Development of a SCS Funding Program” add the following paragraph to the bullet:

MCTC will immediately form an SCS Funding Program Committee or Task Force to define the program and process for funding allocation. At a minimum, the task force or committee will identify the SCS Funding Program project evaluation criteria necessary to evaluate the potential of transportation and other projects to:

- *Reduce GHG and air emissions*
- *Reduce VMT*
- *Reduce vehicle trips*
- *Reduce vehicle hours of delay and idling*
- *Increase transit trips*
- *Increase walkability*
- *Increase bike trips*
- *Support alternative modes or active transportation programs and services*
- *Identify other criteria that enables the task force or committee to clearly identify reductions in GHG emissions locally or on a regional basis*

- ✓ **Chapter 3, Section 3.7, Cultural Resources, Page 3-172,** change the section heading from “3.6” to “3.7”.
- ✓ **Chapter 3, Section 3.7, Cultural Resources, Pages 3-185 through 3-190,** change Impact numbering from 3.6.1 through 3.6.4 to “3.7.1 through 3.7.4”.
- ✓ **Chapter 3, Section 3.7, Cultural Resources, Page 3-192 through 3-195,** *remove duplicate section starting with Impact 3.7.3 continuing to end of section.*
- ✓ **Chapter 3, Section 3.7, Cultural Resources, Page 3-182,** Table 3-49, Museums in Madera County, delete Wild Wonderful King Vintage from the table as the museum is now closed.
- ✓ **Chapter 3, Section 3.8, Energy & Energy Conservation, Pages 3-204 through 3-206, Impact 3.8.1,** Mitigation Measures, 3rd, 4th, 5th, 6th, 7th, 8th, 9th bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.9, Geology/Soils/Minerals, Page 3-223, Impact 3.9.3,** Mitigation Measures, 2nd bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.9, Geology/Soils/Minerals, Page 3-224, Impact 3.9.4,** Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.9, Geology/Soils/Minerals, Page 3-226, Impact 3.9.5,** Mitigation Measures, 1st bullet, Replace “should” with “will”.

- ✓ **Chapter 3, Section 3.10, Hazardous Materials, Page 3-240, Impact 3.10.3**, Mitigation Measures, 3rd bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.10, Hazardous Materials, Page 3-242, Impact 3.10.5**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.10, Hazardous Materials, Page 3-243, Impact 3.10.6**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.10, Hazardous Materials, Page 3-244, Impact 3.10.7**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.10, Hazardous Materials, Page 3-246, Impact 3.10.8**, Mitigation Measures, 1st bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Page 3-252**, Environmental Setting, Hydrology, 2nd bullet titled “Surface Waters”, 2nd paragraph, 2nd sentence, change the words “Sierra Nevada’s” to “Sierra Nevada.”
- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Page 3-261, Impact 3.11.1**, Mitigation Measures, 3rd, 4th bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Page 3-261, Mitigation Measure 3.11.1**, add the following paragraphs to the end of the bulleted listing:
 - ✓ *Recent court rulings and U.S. EPA rulings have diminished which water bodies are recognized as waters of the U.S. Because of this, many projects impact water bodies, including wetlands, considered non-jurisdictional; and therefore, not regulated by the Clean Water Act. These water bodies, however, are considered waters of the State, and are regulated by the California Water Resources Control Board under the Porter-Cologne Water Quality Control Act.*
 - Additionally, any project that requires a discretionary permit from a state agency requires compliance with the California Environmental Quality Act.*
 - Finally, any project that requires a discretionary permit from a state agency requires compliance with the California Environmental Quality Act.*
- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Page 3-263, Impact 3.11.2**, Mitigation Measures, 2nd bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Pages 3-264 through 3-265, Table 1-1, Impact 3.11.3**, Mitigation Measures, 1st, 2nd, 3rd, 4th bullets, Replace “should” with “will”.

- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Page 3-267, Impact 3.11.4**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Pages 3-268 through 3-269, Impact 3.11.5**, Mitigation Measures, 1st, 2nd, 3rd, 4th, 5th, 6th bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.11, Hydrology & Water Resources, Page 3-271, Impact 3.11.7**, Mitigation Measures, 1st, 2nd bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.12, Land Use and Planning, Page 3-287, Table 3-55**, change second column label from “2010/Current Developed Acres” to “2008/Current Developed Acres”.
- ✓ **Chapter 3, Section 3.12, Land Use and Planning, Page 3-287, Table 3-55**, change Agriculture developed acres from “830,071” to “751,351”.
- ✓ **Chapter 3, Section 3.12, Land Use and Planning, Page 3-290**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.12, Land Use and Planning, Page 3-292**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.12, Land Use and Planning, Page 3-294**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3-12, Land Use and Planning, Page 3-294, Impact 3.12.3**, Mitigation Measures, 2nd bullet, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.12, Land Use and Planning, Page 3-295**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.12, Land Use and Planning, Page 3-295, Impact 3.12.4**, Mitigation Measures, 2nd, 4th bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.13, Noise, Page 3-311**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.13, Noise, Page 3-312, Impact 13.13.1**, Mitigation Measure, 2nd bullet, 1st line, remove the word ‘jurisdictional’.
- ✓ **Chapter 3, Section 3.13, Noise, Page 3-312, Impact 3.13.1**, Mitigation Measures, 2nd, 4th, 7th bullets, Replace “should” with “will”.

- ✓ **Chapter 3, Section 3.13, Noise, Page 3-315, Impact 3.13.3**, Mitigation Measures, 4th, 7th bullets, Replace “should” with “will”.
- ✓ **Chapter 3, Section 3.13, Noise, Page 3-316**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.13, Noise, Page 3-319**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.13, Noise, Page 3-320**, under the subsection titled “Mitigation Measures”, 1st paragraph, 1st sentence, change the word “implantation” to “implementing”.
- ✓ **Chapter 3, Section 3.14, Population, Housing & Employment, Page 3-332**, 1st line change “3.29 persons per household” to “3.284 persons per household”.

- ✓ **Chapter 3, Section 3.14, Population, Housing & Employment, Page 3-335, Impact 3.14.1**, Mitigation Measures, 1st bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.

- ✓ **Chapter 3, Section 3.14, Population, Housing & Employment, Page 3-336, Impact 3.14.2**, Mitigation Measures, 1st bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.

- ✓ **Chapter 3, Section 3.14, Population, Housing & Employment, Page 3-336, Impact 3.14.2**, Mitigation Measures, 3rd bullet, Replace “should” with “will”.

- ✓ **Chapter 3, Section 3.15, Public Utilities, Other Utilities, and Service Systems. Page 3-352, Impact 3.15.2**, Mitigation Measures, 1st bullet, Replace “should” with “will”.

- ✓ **Chapter 3, Section 3.15, Public Utilities, Other Utilities & Services Systems, Page 3-354**, Impact 3.15.3, 3rd bullet, delete the following mitigation measure:

- Recently, the Governor declared an emergency drought declaration for the State. Long-term water supply documents anticipate that drought (including severe single-year drought) are

regular occurrences within the State. Because the 2014 RTP and SCS do not propose or approve any development of any water demand projects, the Governor's drought declaration does not indicate that there is a significant water supply impact associated with the RTP and SCS.

- ✓ **Chapter 3, Section 3.15, Public Utilities, Other Utilities & Services Systems, Page 3-355**, under the subsection titled "Mitigation Measures", 1st paragraph, 1st sentence, change the word "implantation" to "implementing".
- ✓ **Chapter 3, Section 3.15, Public Utilities, Other Utilities & Services Systems, Page 3-356, Impact 3.15.4**, Mitigation Measures, 1st, 3rd bullets, Replace "should" with "will".
- ✓ **Chapter 3, Section 3.15, Public Utilities, Other Utilities & Services Systems, Page 3-359**, under the subsection titled "Mitigation Measures", 1st paragraph, 1st sentence, change the word "implantation" to "implementing".
- ✓ **Chapter 3, Section 3.15, Public Utilities, Other Utilities, & Service Systems, Page 3-362, Impact 3.15.8**, Mitigation Measures, 1st bullet, Replace "should" with "will".
- ✓ **Chapter 3, Section 3.17, Transportation/Traffic, Page 3-391, Impact 3.17.1**, Mitigation Measures, 1st bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.
- ✓ **Chapter 3, Section 3.17, Transportation/Traffic, Pages 3-391 through 3-398, Impact 3.17.1**, Mitigation Measures, 6th, 10th through 47th bullets, Replace "should" with "will".
- ✓ **Chapter 3, Section 3.17, Transportation/Traffic, Pages 3-403 through 3-406, Impact 3.17.2**, Mitigation Measures, 1st, 2nd through 7th bullets, Replace "should" with "will".
- ✓ **Chapter 3, Section 3.17, Transportation/Traffic, Page 3-408, Impact 3.17.4**, Mitigation Measures, 1st bullet, Replace "should" with "will".
- ✓ **Chapter 3, Section 3.17, Transportation/Traffic, Pages 3-411 through 3-412, Impact 3.17.6**, Mitigation Measures, 1st, through 7th bullets, Replace "should" with "will".

- ✓ **Chapter 3, Section 3.17, Transportation/Traffic, Page 3-413, Impact 3.17.7, Mitigation Measures, 1st** bullet, add the following paragraph:

When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MTC staff will make suggestions for how compliance could be attained.

- ✓ **Chapter 4, Section 4.1, Page 4-2, 1st paragraph, 5th line, remove the word ‘jurisdictional’.**
- ✓ **Chapter 4, Section 4.2, Page 4-4, Table 4-1, Replace Table 4-1 “2014 RTP and SCS Parameters” with “2014 RTP and SCS UPlan Land Use Allocation Model Parameters (found in Chapter 6 of the RTP and SCS, Table 6-3)”.**
- ✓ **Chapter 4, Section 4.3, Project Alternatives, Page 4-9, place the following paragraph after the 1st paragraph under the heading Agricultural Resources:**

The linear length in lane miles associated with new or expanded transportation improvements is 182 (lane miles added between 2010 and 2040). All project alternatives (except the No Project) have the same set of improvement projects. As a result, there are no differences in terms of impacts among the alternatives studied. The linear lane miles associated with the No Project alternative is 188 (lane miles added between 2000 and 2035). For purposes of the analysis, it is not possible to accurately reflect the amount of agricultural land or resource lands that would be impacted by new or expanding transportation improvement projects.

- ✓ **Chapter 5, Cumulative Effects, Page 5-7, under the subsection titled Aesthetics, Mitigation Measures, 2nd, 3rd bullets, Replace “should” with “will”.**
- ✓ **Chapter 5, Cumulative Effects, Page 5-17, under the subsection titled Hydrology & Water Resources, Mitigation Measures, 2nd through 6th, 8th, 9th, 11th through 16th, bullets, Replace “should” with “will”.**
- ✓ **Chapter 5, Cumulative Effects, Page 5-24, under the subsection titled Public Utilities, Other Utilities, and Services Systems, Mitigation Measures, 2nd through 7th bullets, Replace “should” with “will”.**

TABLE 4-1
2014 RTP and SCS UPlan Land Use Allocation Model Parameters

Parameters	City of Madera			City of Chowchilla		Southeast Madera County New Growth Area			Remaining Madera County Unincorporated Area	
	Status Quo	Low Change	Moderate	Status Quo	Low Change	Status Quo	Low Change	Moderate	Status Quo	Low Change
Demographic Shift in Housing Share	15,235	15,235	15,235	2,784	2,784	13,581	13,581	13,581	5,821	5,821
Very Low	0.0%	0.0%	0.0%	0.25%	0.25%	0.1%	0.1%	0.1%	3.0%	3.0%
Low	1.8%	1.8%	1.0%	6.50%	6.50%	4.2%	4.2%	3.0%	53.0%	53.0%
Medium	82.0%	71.0%	65.0%	80.00%	80.00%	82.0%	74.8%	70.8%	42.0%	42.0%
Medium High	13.0%	20.0%	22.0%	12.50%	12.50%	12.0%	18.2%	20.2%	2.0%	2.0%
High	3.2%	7.2%	12.0%	0.75%	0.75%	1.8%	2.8%	6.0%	0.0%	0.0%
Total:	100.0%	100.0%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Change in Lot Sizes										
Very Low	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)	871,200sf (20 ac)
Low	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)	43,560sf (1 ac)
Medium	7,000sf (0.16 ac)	5,600sf (.13 ac)	6,220sf (0.1428 ac)	7,000sf (0.16 ac)	5,600sf (.13 ac)	7,000sf (0.16 ac)	5,600sf (.13 ac)	4,700sf (.11 ac)	7,000sf (0.16 ac)	5,600sf (.13 ac)
Medium High	3,500 (0.08 ac)	3,000sf (.07 ac)	2,905sf (0.068 ac)	3,500 (0.08 ac)	3,000sf (.07 ac)	3,500 (0.08 ac)	3,000sf (.07 ac)	2,750sf (.068 ac)	3,500 (0.08 ac)	3,000sf (.07 ac)
High	2,200 (0.05 ac)	2,000sf (0.045)	1,800sf (0.04 ac)	2,200 (0.05 ac)	2,000sf (0.045)	2,200 (0.05 ac)	2,000sf (0.045)	1,800sf (.04 ac)	2,200 (0.05 ac)	2,000sf (0.045)
Persons Per Household	3.284	3.284	3.284	3.284	3.284	3.284	3.284	3.284	3.284	3.284
Employees Per Household	0.86	0.86	0.82	0.85	0.85	0.77	0.77	0.77	0.85	0.85
Demographic Shift in Employment Share	13,085	13,085	13,085	2,353	2,353	10,395	10,395	10,395	4,938	4,938
Industrial	30.0%	30.0%	30.0%	24.00%	24.00%	16.220%	16.220%	18.000%	23.9%	23.9%
Commercial Low	60.0%	60.0%	55.0%	67.80%	67.80%	76.170%	76.170%	72.170%	75.1%	75.1%
Commercial High	10.0%	10.0%	15.0%	8.20%	8.20%	7.610%	7.610%	9.830%	1.0%	1.0%
Total:	100.00%	100.00%	100.00%	100.0%	100.0%	100%	100%	100.000%	100.00%	100.00%
Change in Intensities										
Industrial	0.25 FAR (825 sf/emp)	0.25 FAR (825 sf/emp)	0.25 FAR (825 sf/emp)	0.2 FAR (825 sf/emp)	0.22 FAR (825 sf/emp)	0.2 FAR (825 sf/emp)	0.25 FAR (825 sf/emp)	0.25 FAR (825 sf/emp)	0.2 FAR (825 sf/emp)	0.22 FAR (825 sf/emp)
Commercial Low	0.3 FAR (500 sf/emp)	0.325 FAR (500sf/emp)	0.325 FAR (500 sf/emp)	0.2 FAR (500 sf/emp)	0.25 FAR (500 sf/emp)	0.2 FAR (500 sf/emp)	0.3 FAR (500 sf/emp)	0.3 FAR (500 sf/emp)	0.2 FAR (500sf/emp)	0.25 FAR (500 sf/emp)
Commercial High	0.425 FAR (400 sf/emp)	0.45 FAR (400sf/emp)	0.45 FAR (400sf/emp)	0.4 FAR (400 sf/emp)	0.4 FAR (400 sf/emp)	0.4 FAR (400 sf/emp)	0.45 FAR (400 sf/emp)	0.45 FAR (400 sf/emp)	0.4 FAR (400sf/emp)	0.4 FAR (400 sf/emp)
Transportation Enhancements	New Freeway Ramps	Regional Transit Network (RTN)		New Freeway Ramps	Regional Transit Network (RTN)	New Freeway Ramps	Regional Transit Network (RTN)		New Freeway Ramps	Regional Transit Network (RTN)
Change in General Plan	Use new GP for City of Madera and Chowchilla			Use new GP for City of Madera and Chowchilla		Use new GP for City of Madera and Chowchilla			Use new GP for City of Madera and Chowchilla	
Infill Consideration	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value	Urban Non Res: <70% of GP FAR & >10 yrs; Improvement Value <= Land Value	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value	Urban Non Res: <70% of GP FAR & >10 yrs; Improvement Value <= Land Value	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value	Urban Non Res: <50% of GP FAR & >25 yrs; Improvement Value <= Land Value
	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas	Urban Res: Imp Value <= 70% of Land Value & Land Area >0.75 Acre in Urban Areas	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas	Urban Res: Imp Value <= 70% of Land Value & Land Area >0.75 Acre in Urban Areas	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas	Urban Res: Imp Value <= 50% of Land Value & Land Area >1 Acre in Urban Areas
Demand Characterization	Status Quo	Demand for unit types stays the same	Shift to higher density	Status Quo	Demand for unit types stays the same	Status Quo	Demand for unit types stays the same	Shift to higher density	Status Quo	Demand for unit types stays the same
	Status Quo	Lot size decreases	Lot size closer to General Plan average	Status Quo	Lot size decreases	Status Quo	Lot size decreases	Lot size decreases	Status Quo	Lot size decreases

APPENDIX A - STATEMENT OF OVERRIDING CONSIDERATIONS

SUMMARY OF SIGNIFICANT, ADVERSE, UNAVOIDABLE IMPACTS

The Madera County Transportation Commission (MCTC) has prepared a mitigation monitoring program for the MCTC 2014 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) Draft and Final Program Environmental Impact Report (PEIR) as required by the California Environmental Quality Act (CEQA), Public Resources Code 21000 et seq. MCTC identified several significant, adverse, and unavoidable impacts in the Draft and Final PEIRs. As such, CEQA requires the MCTC Board of Directors to balance the benefits of the Proposed Plan against its unavoidable environmental risks in determining whether to approve the RTP and SCS. The PEIRs identify the following significant, adverse, and unavoidable environmental impacts:

- ✓ **Impact 3.2.1:** Construction and implementation of individual projects could potentially impede or block views of scenic resources as seen from the transportation facility or from the surrounding area.
- ✓ **Impact 3.2.2:** Construction and implementation of the projects could alter the appearance of scenic resources along or near designated scenic highways and vista points.
- ✓ **Impact 3.2.3:** Construction and implementation of the projects could create significant contrasts with the overall visual character of the existing landscape setting.
- ✓ **Impact 3.2.4:** Construction and implementation of individual projects could potentially create a new source of substantial light or glare that would affect day or nighttime views of scenic resources as seen from the transportation facility or from the surrounding area.
- ✓ **Impact 3.3.1:** Strategies aimed at addressing the transportation needs of future growth patterns were considered during development of the proposed RTP and SCS. The document promotes a preferred land use scenario and alternative transportation system to the automobile through enhanced funding for transit and other alternative modes of transportation such as bicycle facilities, trails, airport improvements, and others. Implementation of strategies proposed in the RTP and SCS could result in positive changes to land uses and reduced impacts on important farmland or Forest/Timber Lands. Reducing the footprint of new development as reflected in the 2014 RTP and SCS protects farmland, Williamson Act contract land, forest/timber land, and other open space lands in the Madera region.

Implementation of transportation improvements included in the RTP could influence land use patterns throughout the region as shown in the SCS and result in the conversion of important agricultural lands. Land use and transportation policies are emphasized in the RTP in order to address automobile traffic and air quality concerns. Growth patterns that promote alternatives to the automobile by creating mixed-use developments, which would include residences, shops, parks, and

civic institutions, linked to pedestrian-and-bicycle friendly public transportation centers, are also discussed in the RTP and in the SCS. Implementation of enhanced alternative modes as provided by the RTP could result in more balanced land use conditions throughout the region, as the mixed-use developments would result in a concentration of jobs and residences in close proximity to one another. Reducing the footprint of new development as reflected in the 2014 RTP and SCS protects farmland, Williamson Act contract land, forest/timber land, and other open space lands in the Madera region.

While the RTP is likely to result in a positive outcome related to supportive land use conditions for alternative forms of transportation such as transit, other projects in the Plan could have significant impacts on land use patterns, potentially causing land use growth and development to occur in areas not previously envisioned for growth and development. This impact could be especially significant on agricultural land uses within the County.

- ✓ **Impact 3.3.2:** Implementation of the proposed Project could potentially conflict with existing zoning for agriculture use, Williamson Act Contract or forest/timber lands resulting in the disturbance or loss of some of these designated areas.
- ✓ **Impact 3.3.3:** Impacts on farmland related to transportation improvements from implementation of the proposed Project are considered potentially significant.
- ✓ **Impact 3.4.2:** The RTP and SCS includes projects that may violate air quality standards or contribute substantially to an existing or projected air quality violation.
- ✓ **Impact 3.4.4:** The RTP and SCS includes projects that may expose sensitive receptors to substantial pollutant concentrations.
- ✓ **Impact 3.4.5:** Proposed projects identified in the RTP and SCS may create objectionable odors affection a substantial number of people.
- ✓ **Impact 3.5.1:** The RTP and SCS includes projects that may result in direct removal or degradation of riparian habitat or other sensitive natural communities during construction activities such as grading and grubbing.
- ✓ **Impact 3.5.2:** The RTP and SCS includes projects that may result in direct impacts to plant and wildlife species including rare, threatened and/or endangered species during construction and operation of the proposed transportation facilities through the removal of native habitat.
- ✓ **Impact 3.5.3:** The Project may result in indirect impacts to plant and wildlife species including rare, threatened and/or endangered species during the construction and operation through edge effects such as noise, lighting and visual deterrents.

✓ **Impact 3.5.4:** The Project would result in temporary and permanent impacts to terrestrial and aquatic wildlife movement. The linear nature of transportation projects increases the potential extent and significance of impacts to wildlife movement. Transportation facilities pose barriers to wildlife crossings that may result in injury or death of wildlife attempting to traverse the facility. These barriers also result in fragmentation of natural habitat and increased impacts associated with edge effects from lighting, noise, human disturbance, exotic plant infestations, urban runoff, etc. Smaller fragments of habitat result in greater intensity of the edge effects. It is also important to maintain connections between populations of wildlife so that interbreeding, and/or that young have no ability to disperse to suitable habitats, does not occur. Impacts to wildlife movement would be greater along entirely new transportation facilities than with improvements to existing facilities, because the existing facility has already formed a barrier, and the addition of new lanes for example, may only slightly increase the barrier effect.

✓ **Impact 3.5.5:** The 2014 RTP and SCS would potentially increase siltation of streams and other water resources from exposures of erodible soils during construction activities. Excessive siltation can significantly degrade habitat for fish and other aquatic organisms. Heavy sediment deposition can bury slow-moving or sessile bottom-dwelling organisms, fish eggs and larval forms of many aquatic organisms. These losses are not only of direct concern, but also represent a loss of food sources for larger fishes and other organisms, such as birds and mammals, that are not directly affected by sediments.

Increased sediment can also decrease light penetration for aquatic plant production and increase water temperature from greater insulation. Higher water temperatures can affect aquatic organisms through direct stress of temperature-sensitive organisms (e.g., steelhead require cold water streams), and by increasing nitrate productivity which can exacerbate eutrophication if the sediments contain or are accompanied by excessive nutrients (i.e., algal blooms). The degree of this impact would depend on several factors including the following:

- *Length of occurrence.* The longer the period of sedimentation, the greater the potential for significance.
- *Timing of occurrence.* The effect would be of greater significance during particularly sensitive times of year, such as during fish spawning seasons when the eggs and larvae which are particularly sensitive to siltation would be present; and,
- *Significance of Resource.* The effect would be of greater significance where a special status species might be affected, such as near a steelhead spawning stream.

✓ **Impact 3.5.6:** Transportation and future land use impacts related to conflicts with local policies or ordinances protecting biological resources are considered potentially significant.

✓ **Impact 3.6.1:** Increased Transportation GHG Emissions may contribute to Climate Change.

- ✓ **Impact 3.7.1:** Development of highway, arterial, bridge crossing, transit, and future land use development projects may have a significant impact on historical resources.
- ✓ **Impact 3.7.2:** Construction activities involving excavation and earthmoving may encounter archaeological resources.
- ✓ **Impact 3.7.3:** Construction activities involving excavation and earthmoving may encounter paleontological materials.
- ✓ **Impact 3.7.4:** Construction activities involving excavation and earthmoving may encounter human remains.
- ✓ **Impact 3.8.1:** Construction activities proposed in the 2014 RTP and SCS would lead to a substantial increase in energy consumption associated with construction equipment and vehicles primarily powered by nonrenewable fuels.
- ✓ **Impact 3.9.1:** Seismic events can damage transportation infrastructure and land use development through ground shaking, liquefaction, surface rupture, and land sliding. Property damage and public safety from seismic activity would be considered a significant impact in some cases.
- ✓ **Impact 3.9.2:** Some improvement projects require significant earthwork, increasing potential slope failure and long-term erosion. Earthwork can also alter unique geologic features.
- ✓ **Impact 3.9.3:** Proposed transportation infrastructure designs and future land use development could potentially have significant impacts to property and public safety due to subsidence and the presence of expansive soils.
- ✓ **Impact 3.9.4:** Implementation of proposed individual Projects could result in the loss of availability of a designated mineral resource that would be of value to the region and the residents of the State.
- ✓ **Impact 3.9.5:** Implementation of proposed individual Projects could result in the loss of availability of locally-important mineral resource recover sites delineated on a local general plan, specific plan, or other land use plan.
- ✓ **Impact 3.10.1:** Proposed 2014 RTP and SCS projects could create a significant hazard to the public or the environment through the routing transport, use, or disposal of hazardous materials.
- ✓ **Impact 3.10.2:** The implementation of the 2014 RTP and SCS could create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during transportation. Implementation of the 2014 RTP

and SCS would facilitate the movement of goods, including hazardous materials, through the region. Transportation of goods, in general, and hazardous materials in particular, can thus be expected to increase substantially with implementation of the 2014 RTP and SCS.

- ✓ **Impact 3.10.3:** Due to the large number of contaminated sites, construction of new transportation facilities or future land use developments could disturb contaminated property.
- ✓ **Impact 3.10.4:** Emit Hazardous Materials within One-Quarter Mile of a School.
- ✓ **Impact 3.10.5:** Transportation improvements and future land use development associated with the implementation of the proposed RPT and SCS could result in a safety hazard within an airport plan area.
- ✓ **Impact 3.10.6:** Transportation improvements and future land use development associated with implementation of the 2014 RTP and SCS could result in a safety hazard within the vicinity of a private airstrips, creating hazards from tall structures, glare producing objects, bird and wildlife attractants, radio waves from communication centers, or other features that have the potential to interfere with take-off or landing procedures.
- ✓ **Impact 3.10.7:** Implementation of the proposed Project could impair implementation of our physically interfere with an adopted emergency response plan or emergency evacuation plan.
- ✓ **Impact 3.10.8:** Implementation of the proposed Project could expose people or structures to a significant risk of loss, injury, or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands.
- ✓ **Impact 3.11.1:** Construction activities related to the implementation of the RTP and SCS could violate Regional Water Quality Control Board water quality standards or waste discharge requirements.
- ✓ **Impact 3.11.2:** Individual projects and future land use developments could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.
- ✓ **Impact 3.11.3:** Construction activities could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.
- ✓ **Impact 3.11.4:** The proposed Project could increase flooding, alter the existing drainage patterns, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding or exceeding the capacity of existing or planned storm water drainage systems.

- ✓ **Impact 3.11.5:** Projects identified in the 2014 RTP and SCS could create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
 - ✓ **Impact 3.11.6:** Construction activities related to transportation projects could substantially degrade water quality.
 - ✓ **Impact 3.11.7:** Construction of new land use developments could place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, a Flood Insurance Rate Map, or other flood hazard delineation map.
 - ✓ **Impact 3.11.8:** The 2014 RTP and SCS could alter existing drainage patterns or substantially increase the rate or amount of surface runoff in a manner that would result in flooding or produce or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
 - ✓ **Impact 3.11.9:** Construction activities including the placement of structures within a 100-year flood hazard area can impede flood waters, altering the flood risks both upstream and downstream.
 - ✓ **Impact 3.12.1:** Physically divide a community.
 - ✓ **Impact 3.12.2:** Construction and implementation of projects would result in the loss of open space and community recreation areas. This would be considered a potentially significant impact. Pockets of open space vary in size and location throughout the County and within the cities. Open space land uses include agricultural areas, public parks, recreational facilities, and areas planned for such uses.
 - ✓ **Impact 3.12.3:** Development of RTP and SCS-related projects and programs could result in the disturbance or loss of open spaces and recreational resources.
 - ✓ **Impact 3.12.4:** The proposed Project will likely increase populations in areas without ample park space, thus resulting in creased use and deterioration of existing neighborhood and regional parks.
 - ✓ **Impact 3.13.1:** Noise-sensitive land uses could be exposed to noise in excess of normally acceptable noise levels and/or could experience substantial increases in noise as a result of the operation of expanded or new transportation facilities (i.e., increased traffic resulting from new highways, addition of highway lanes, roadways, ramps, and new transit facilities as well as increased use of existing transit facilities, etc.) and future noise generating land use developments.
 - ✓ **Impact 3.13.2:** Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels.
 - ✓ **Impact 3.13.3:** Ambient noise levels could increase in the region to exceed normally acceptable noise levels or have substantial increases in noise as a result of the operation of expanded or new
-

transportation facilities (i.e., increased traffic resulting from new highways, addition of highway lanes, roadways, ramps, and new use of new transit facilities as well as increased use of existing transit facilities, etc.).

- ✓ **Impact 3.13.4:** Construction activities related to the 2014 RTP and SCS could cause substantial temporary or periodic increases in ambient noise levels in the immediate vicinity of the construction sites, sometimes for extended durations.
- ✓ **Impact 13.13.5:** Construction of new highway and transit facilities or the modification of an existing system near one of the public airports located in Madera County could expose workers to excessive noise levels.
- ✓ **Impact 13.13.6:** Construction of new highway and transit facilities or the modification of an existing system near one of the private airstrips located in Madera County could expose workers to excessive noise levels.
- ✓ **Impact 3.14.1:** The Project could potentially displace or relocate residences and businesses through acquisition of land and buildings necessary for highway, arterial, and transit improvement.
- ✓ **Impact 3.14.2:** The Project has the potential to displace or cause the relocation of residences and businesses through acquisition of land and buildings necessary for highway, arterial, and transit improvements, as well as future land use development.
- ✓ **Impact 3.14.3:** The Project has the potential to disrupt or divide a community by separating community facilities, restricting community access and eliminating community amenities.
- ✓ **Impact 3.15.1:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks, and other public facilities.
- ✓ **Impact 3.15.2:** Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- ✓ **Impact 3.15.3:** Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- ✓ **Impact 3.15.4:** Growth and development and transportation improvements expected to occur as part of the 2014 RTP and SCS would be primarily focused in previously developed urban areas. A limited

number of new developments in urban areas would convert undeveloped land to impermeable surfaces, resulting in an increase in storm water runoff, which could potentially exceed the capacity of existing storm water drainage facilities.

- ✓ **Impact 3.15.5:** Have sufficient water supplies available to serve the project from existing entitlements and resources, or the need for new or expanded entitlements.
- ✓ **Impact 3.15.6:** Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- ✓ **Impact 3.15.7:** Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.
- ✓ **Impact 3.15.7:** Comply with federal, state, and local statutes and regulations related to solid waste.
- ✓ **Impact 3.17.1:** The proposed RTP and SCS are based on regional employment and population forecasts, and accommodate this growth through land use and transportation projects. Although the project focuses on relieving vehicle congestion to the extent possible, it does cause an increase in VMT and that leads to an increase in traffic congestion. This is a significant impact of the project.

The RTP and SCS will tend to make changes to the distribution of trips in adjacent counties and therefore does have the potential to cause significant traffic impacts in adjacent counties. This is considered to be a significant and unavoidable impact of the Project.

- ✓ **Impact 3.17.2:** While improved mobility will result from implementation of the projects contained in the RTP, some significant unavoidable impacts, considering the regional minimum LOS policy of "D" will occur. LOS deficiencies will result along a number of regional street and highway segments and associated intersections because of the inability to widen such facilities due to funding and other constraints even with RTP projects. It is anticipated that even with implementation of the Project significant LOS deficiencies will continue therefore.
- ✓ **Impact 3.17.4:** Development of RTP and SCS-related projects and programs could result in a substantial increase in hazards due to a design feature or incompatible uses by increasing the opportunities for walking and biking, thereby making it necessary that multi-modal facilities be designed to enhance the safety of these users.
- ✓ **Impact 3.17.5:** Congestion is expected to worsen between now and 2040 which could adversely impact emergency access. While the 2014 RTP and SCS would generally enhance mobility and access to destinations (including access for emergency vehicles) as compared to the No Project Alternative,

measures should be implemented to maintain adequate emergency access in the design of RTP projects.

- ✓ **Impact 3.17.6:** While the 2014 RTP and SCS will not directly result in inadequate parking capacity, measures should be implemented to ensure that negative parking impacts are minimized in the design of the individual transportation projects included in the RTP. Expected population increases as well as land use development in Madera County will increase the traffic volumes and parking demand.
- ✓ **Impact 3.17.7:** The 2014 RTP and SCS includes a list of improvement projects and programs (including public transit, bicycle and trail, and pedestrian projects) to enhance Madera County's multi-modal transportation system. These RTP projects are consistent with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. At the time of project implementation, additional environmental analyses will be required which the implementing agency will use to ensure adequate access for transit and active mode users in the design of RTP projects.

While the RTP and SCS would generally enhance and improve mobility for transit and active modes, it also contains roadway projects that have the potential to create conflicts between motorists and transit riders, pedestrians and cyclists.

OVERRIDING CONSIDERATIONS

MCTC is required to prepare this Statement of Overriding Considerations to explain the reasons for approving the 2014 RTP and SCS, despite the unavoidable impacts identified in the PEIR and Findings of Fact (as per Section 15093 of the State CEQA Guidelines). In preparing this Statement, MCTC has balanced the benefits of the Proposed Plan against its unavoidable environmental risks. MCTC finds that the unavoidable significant adverse effects of the individual improvement projects are overridden by the benefits of those projects and the considerations described below. MCTC, therefore, makes and adopts the following Overriding Considerations:

- ✓ The requirement for updates to the RTP every four (4) years, which provides for the identification of transportation modes to address population and employment growth, is required by State Law and sound local planning practice, and is an overriding concern.
- ✓ The specific need to provide necessary, feasible and sustainable transportation system improvements within the region is an overriding concern.
- ✓ The need to provide choice in the availability of transportation modes for County residents as a means to avoid significant delay and congestion, which may indirectly harm businesses and residents that depend upon a viable transportation system, is an overriding concern.

- ✓ Because there is no alternative other than the “No Project” (2011 Regional Transportation Plan), and the Status Quo and the Low Change Scenario Alternatives to converting some prime farmland for expansion of the circulation system, the need for such conversion is an overriding concern.
- ✓ While the individual improvement projects will not result in emissions beyond those allowed through the conformity process, and construction and hot spot emission impacts can be mitigated or are not found to be significant, the fact that the Valley continues to be nonattainment for volatile organic compounds, nitrogen oxides, and PM emissions, is an overriding concern.
- ✓ Because there is no alternative other than “No Project”, and the Status Quo and the Low Change Scenario Alternatives to the loss of some biological resources for expansion of the circulation system, the loss of such resources is an overriding concern.
- ✓ The 2014 RTP and SCS balances the need to preserve valuable agricultural and biological resources with the region’s need to provide a viable transportation system to accommodate anticipated population and employment growth and the related increased need for employment opportunities and municipal revenue. This planning balance is an overriding concern.
- ✓ Regional benefits associated with implementation of the 2014 RTP and SCS (reduced vehicular emissions, reduced congestion, reduced travel time, reduced vehicle miles traveled and improved mobility), will result from the implementation of planned improvement projects, which outweigh the potentially unavoidable localized impacts to land use development that may result from the individual improvement projects.
- ✓ Implementation of the 2014 RTP and SCS will result in increased unavoidable noise levels as a result of expansion of the planned transportation system, but the specific need to provide necessary, feasible and sustainable transportation system improvements within the region that supports planned growth and development, is an overriding concern.
- ✓ Implementation of the 2014 RTP and SCS would result in positive impacts on public services; however, long-term maintenance of various transportation modes including streets and highways is an overriding concern.
- ✓ Regional and localized benefits associated with implementation of the 2014 RTP and SCS (reduced vehicular emissions, reduced congestion, reduced travel time, reduced vehicle miles traveled and improved mobility), that will result from the implementation of planned improvement projects, outweigh the potentially unavoidable impacts associated with individual or localized improvement projects and other projects identified in the Project alternatives. These other alternatives will result

in a greater number of Level of Service (LOS) deficiencies and infeasible transportation projects that will not result in further benefits beyond implementation of the 2014 RTP and SCS.

Based on substantial evidence in the public record, MCTC finds that, for the reasons set forth above, the economic, social and other consideration of the individual improvement projects outweigh the unavoidable agricultural, biological, land use/planning, noise, and transportation/circulation impacts identified in the PEIRs. First, the individual improvement projects identified in the 2014 RTP and SCS are required to meet travel demand of residents and businesses through to the year 2040. Second, the planned transportation improvements will enhance continued economic growth in the region. Third, the planned improvements will reduce levels of vehicular emissions and LOS deficiencies compared to the other project alternatives. Fourth, appropriate and achievable mitigation measures have been proposed, which are within MCTC's and its member agencies' jurisdiction to mitigate or avoid the significant environmental effects identified in the PEIRs.

OVERRIDING REASONS

Therefore, in accordance with Section 15093 of the State CEQA Guidelines, MCTC is required to prepare this Statement of Overriding Considerations to explain the reasons for approving the 2014 RTP and SCS, despite the unavoidable impacts identified in the PEIR and Findings of Fact. In preparing this Statement, MCTC has balanced the benefits of the Project against its unavoidable environmental risks. For the reasons specified below, MCTC finds that the benefits of the Project outweigh the unavoidable environmental risks. In addition, the Findings of Fact identify a number of recommended mitigation measures that are found to be within the jurisdiction of other public agencies and not MCTC, and that these measures have been or should be adopted by such other agencies. MCTC finds that, for the reasons specified below, the Project should be adopted as the 2014 RTP and SCS notwithstanding the fact that responsibility for mitigating the potential adverse impacts rests with agencies other than MCTC.

The following reasons are consistent with the intent and purpose of the 2014 RTP and SCS:

Quality of Life

- ✓ The Project is intended to contribute to the quality of life that is experienced and will be experienced by the residents of Madera County.
- ✓ The Project is designed to meet the needs of everyday travel for all types of purposes as well as for large regional movements over the long-term. Transportation is closely connected with many other issues, such as air quality, the environment, and land use, health, safety, and economic vitality and the Project contains goals and actions to address these issues.

Access and Mobility

- ✓ The Project includes many strategies to address both access and mobility and acknowledges that certain major corridors will need major investments in all modes of transportation to maintain and improve both access and mobility for the growth in travel that is occurring.
 - Access: Significant increases are planned for the street and highway, transit, and bicycle, trails, and pedestrian systems in the County. The projects must undergo extensive planning and analysis processes with community involvement.
 - Mobility: The Project includes a slate of projects aimed at reducing the most critical areas of congestion from a regionwide viewpoint. In addition to enhanced transit service and non-motorized modes of transportation, mobility projects include additional lanes along streets and highways, interchange improvements, maintenance and rehabilitation of the existing system of streets and highways, and other capacity enhancements throughout the region.
- ✓ The Project also includes funding for local road improvements, including lane additions, intersection improvements, and rehabilitation and maintenance of the existing street and highways system.

Air Quality

- ✓ The Project includes funding for significant increases in alternative modes of transportation -- public transit, bicycle, pedestrian projects and community design projects -- that will make alternative modes of transportation more attractive.
- ✓ While the individual improvement projects will not result in emissions beyond those allowed through the conformity process, and construction and hot spot emission impacts can be mitigated or are not found to be significant, the fact that the Valley continues to be nonattainment for ozone, PM₁₀ and PM_{2.5} emissions is an overriding concern.

Travel Choices

- ✓ The Project invests significant funding into offering choices of travel mode to future residents. Major increases in, bus, bicycle, and pedestrian modes are envisioned, along with promotion of sharing rides.
- ✓ Regional and localized benefits associated with implementation of the 2014 RTP and SCS (reduced vehicular emissions, reduced congestion, reduced travel time, reduced vehicle miles traveled and improved mobility), that will result from the implementation of planned improvement projects, outweigh the potentially unavoidable impacts associated with individual or localized improvement

projects and other projects identified in the Project alternatives. These other alternatives will result in a greater number of Level of Service (LOS) deficiencies and infeasible transportation projects that will not result in further benefits beyond implementation of the 2014 RTP and SCS.

Economic Vitality

- ✓ The Project includes major corridor improvements that connect areas around the County. It also includes significantly enhanced bus transit systems to help manage demand.
- ✓ Investment in road maintenance and rehabilitation is provided, particularly a problem in rural areas where farm-to-market truck travel and commuter travel is important.

Equity

- ✓ The Project incorporates the priorities of local communities and many of these local projects are paid for from local funds. Major projects of regional concern are located throughout the region as well.
- ✓ The Project will provide alternatives -- public transit, bicycle, and pedestrian facilities -- for those who cannot or do not drive.
- ✓ The need to provide choice in the availability of transportation modes for County residents as a means to avoid significant delay and congestion, which may indirectly harm businesses and residents that depend upon a viable transportation system, is an overriding concern.

Transportation and Land Use

- ✓ Investment in the transportation system will offer opportunities to grow logically and address the interaction between land use and transportation more effectively.
- ✓ The requirement for amendments to the RTP every four years, which provides for the identification of transportation modes to address population and employment growth, is required by State Law and sound local planning practice, and is an overriding concern.
- ✓ The specific need to provide necessary, feasible and sustainable transportation system improvements within the region is an overriding concern.
- ✓ Because there is no alternative other than the “No Project” (2011 Regional Transportation Plan), and the Status Quo and Low Change Scenario Alternatives to converting some prime farmland for expansion of the circulation system, the need for such conversion is an overriding concern.

- ✓ Implementation of the 2014 RTP and SCS would result in positive impacts on public services; however, long-term maintenance of various transportation modes including street and highway is an overriding concern.

Funding and Revenue

- ✓ The Project shows revenues available from all sources -- federal, state, and local. The 2014 RTP and SCS would provide additional funding than that included in the RTP. The region will continue to receive federal and state funding to program projects through to the Year 2040.
- ✓ Overall, the Project provides funding transit operations and improvements, highway, street and road improvements, highway, street and road maintenance and rehabilitation, and for other kinds of improvements (bicycle, pedestrian, community design, etc.).

Health and Safety

- ✓ Pedestrian and bicycle projects are specifically allocated funding in the 2014 RTP and SCS and funds have also been identified for such improvements in the RTP. Local road and state highway safety-related improvements are also included.
- ✓ Regional benefits associated with implementation of the 2014 RTP and SCS (reduced vehicular emissions, reduced congestion, reduced travel time, reduced vehicle miles traveled and improved mobility), will result from the implementation of planned improvement projects, which outweigh the potentially unavoidable localized impacts to land use development that may result from the projects.

Environmental Sustainability

- ✓ The Project includes a number of projects and programs that mitigate environmental issues.
- ✓ Because there is no alternative other than “No Project”, and the Status Quo and Low Change Scenario Alternatives to the loss of some biological, cultural and agricultural resources for expansion of the circulation system, the loss of such resources is an overriding concern.
- ✓ The 2014 RTP and SCS balances the need to preserve valuable agricultural and biological resources with the region’s need to provide a viable transportation system to accommodate anticipated population and employment growth and the related increased need for employment opportunities and municipal revenue. This planning balance is an overriding concern.
- ✓ Implementation of the 2014 RTP and SCS will result in increased unavoidable noise levels as a result of expansion of the planned transportation system, but the specific need to provide necessary,

feasible and sustainable transportation system improvements within the region that supports planned growth and development, is an overriding concern.

Based on substantial evidence in the public record, MCTC finds that, for the reasons set forth above, the economic, social and other considerations of the project outweigh the unavoidable agricultural, biological, land use/planning, noise, and transportation/circulation impacts identified in the PEIR. First, the individual improvement projects identified in the 2014 RTP and SCS are required to meet travel demand of residents and businesses through to the Year 2040. Second, the planned transportation improvements will enhance continued economic growth in the region. Third, the planned improvements will reduce levels of vehicular emissions and LOS deficiencies compared to the other project alternatives. Fourth, appropriate and achievable mitigation measures have been proposed, which are within MCTC's and its member agencies' jurisdiction to mitigate or avoid the significant environmental effects identified in the PEIR.

APPENDIX B - MITIGATION MONITORING PROGRAM

STATUTORY REQUIREMENTS

This Mitigation Monitoring Program for the Madera County Transportation Commission (MCTC) 2014 Regional Transportation Plan and Sustainable Communities Strategy (RTP and SCS) Program Environmental Impact Report (PEIR) has been developed in accordance with Section 21081.6 of the Public Resources Code, which requires a Lead Agency that approves or carries out a project, where a PEIR has identified significant environmental effects, to adopt a reporting or monitoring program. The purpose of this program is to identify the changes to the project, which the Lead Agency has adopted or made a condition of a project approval in order to mitigate or avoid significant effects on the environment. MCTC is the Lead Agency that must adopt the mitigation monitoring program.

Section 21069 of the CEQA statute defines Responsible Agency as a public agency, other than the Lead Agency, which has the responsibility for carrying out or approving a project. MCTC finds that the implementation of some mitigation measures listed on the following pages of the Final PEIR are not within its jurisdiction, and can and should be implemented and monitored by agencies responsible for implementing the projects, including but not limited to the following: cities, Counties, Caltrans, transit districts, and other responsible agencies.

CEQA statutes and Guidelines provide direction for clarifying and managing the complex relationships between a Lead Agency and other agencies with respect to implementing and monitoring mitigation measures. In accordance with CEQA Guidelines Section 15097.d, "each agency has the discretion to choose its own approach to monitoring or reporting; and each agency has its own special expertise." This discretion will be exercised by implementing agencies at the time they undertake any of the individual improvement projects identified in the Draft and Final EIRs.

Regular review and update of the 2014 RTP and SCS will be conducted by MCTC, as appropriate. These updates involve a determination of regional transportation and air quality impacts and require air quality conformity pursuant to the federal Clean Air Act.

ADMINISTRATION OF THE MITIGATION MONITORING PROGRAM

Mitigation measures listed in this Mitigation Monitoring Program (reference Table B-1) will be implemented by one or more responsible or implementing agencies when those agencies undertake individual transportation improvement projects identified in the RTP and SCS.

The Mitigation Monitoring Program consists of the following components and is reflected in Table B-1):

- ✓ Mitigation measures contained in the Draft and Final PEIR
- ✓ Identification of Responsible Party
- ✓ Description of mitigation measure timing
- ✓ Identification of monitoring agency

This Mitigation Monitoring Program shall be maintained in MCTC files for the MCTC 2014 Regional Transportation Plan and Sustainable Communities Strategy.

MITIGATION MONITORING PROGRAM

The Mitigation Monitoring Program associated with the MCTC 2014 RTP and SCS PEIR is provided in Table B-1 below.

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
3.2 AESTHETICS				
3.2.1 Obstruction of Views	<ul style="list-style-type: none"> ✓ Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions. ✓ To the extent feasible, noise barriers that will not degrade or obstruct a scenic view will be constructed. Noise barriers will be well landscaped, complement the natural landscape and be graffiti-resistant. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.2.2 Altered Appearance of Scenic Resources	<ul style="list-style-type: none"> ✓ Avoid construction of transportation facilities and new development in state and locally designated scenic highways and vista points. ✓ If transportation facilities and new development are constructed in state and locally designated scenic highways and/or vista points, design, construction, and/or operation of the transportation facility or new development will be consistent with applicable guidelines and regulations for the preservation of scenic resources along the designated scenic highway. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.2.3 Development of Previously Undeveloped Sites with Visual Qualities	<ul style="list-style-type: none"> ✓ Where appropriate, encourage the development of design guidelines for each type of transportation facility and land use that make elements of proposed projects visually compatible with surrounding areas. Visual guidelines will, at a minimum, include setback buffers, landscaping, 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>color, texture, signage, and lighting criteria. The following methods will be employed whenever possible:</p> <ul style="list-style-type: none"> ➤ Transportation systems and new development will be designed in a manner where the surrounding landscape dominates. ➤ Transportation systems and new development will be developed to be compatible with the surrounding environment (i.e., colors and materials of construction material). ➤ If exotic vegetation is used, it will be used as screening and landscaping that blends in and complements the natural landscape. ➤ Trees bordering highways will remain or be replaced so that clear cutting is not evident. ➤ Grading will blend with the adjacent landforms and topography. <p>✓ Project implementation agencies will design transportation and new development projects to minimize contrasts in scale and massing between the project and surrounding natural forms and development. Project implementation agencies will design projects to minimize their intrusion into important view sheds and use contour grading to better match surrounding terrain. To the maximum extent feasible, landscaping along highway corridors will be designed to add significant natural elements and visual interest to soften the hard-edged, linear travel experience that would otherwise occur.</p> <p>✓ Project implementation agencies will use natural landscaping to minimize contrasts between the Project (RTP and SCS) and surrounding areas. Wherever possible, interchanges and transit lines will be designed at the grade of the surrounding land to limit view blockage. Edges of major cut and- fill slopes will be contoured to provide a more natural looking finished profile. Project implementation agencies will replace and renew landscaping to the greatest extent possible along corridors with road widenings, interchange projects, and related improvements. New corridor landscaping will be designed to respect existing natural and man-made features and to complement the dominant landscaping of surrounding areas.</p> <p>✓ Project implementation agencies will construct sound walls of materials whose color and texture complements the surrounding</p>	<p>over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	landscape and development and to the maximum extent feasible, use color, texture, and alternating facades to “break up” large facades and provide visual interest. Where there is room, project sponsors will landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.			
3.2.4 New Sources of Light and Glare	<p>✓ Where appropriate, encourage the development of design guidelines for each type of transportation facility and land use development that make light elements of proposed facilities visually compatible with surrounding areas. The following methods will be employed whenever possible:</p> <ul style="list-style-type: none"> ➤ Transportation systems and new development areas will be designed in a manner where the surrounding landscape dominates. ➤ Transportation systems and new development areas will be developed to be compatible with the surrounding environment. ➤ Lighting devices will be employed such as downward facing light, light shields, and amber lumens. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.3 AGRICULTURAL RESOURCES				
3.3.1 Conversion of Important Farmland or Forest/Timber Lands	<p>✓ Following approval of the 2014 RTP and SCS, the MCTC Policy Board will form a sub-committee to analyze, discuss and provide recommendation on agricultural mitigation measures for inclusion into the transportation planning process at MCTC. Working collaboratively with the community-based organizations, interested stakeholders and professional staff, this committee discuss the formulation of policy and program language to:</p> <ul style="list-style-type: none"> ➤ Develop a methodology to help implementing agencies quantify the conversion of prime farmland, unique farmland, farmland of statewide importance, and farmland of local importance associated with their proposed projects. ➤ Develop a methodology for implementing agencies to consider preservation ratios to minimize loss of prime, unique, and 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-</p>	<p>✓ August 2014 through August 2015</p>	<p>✓ MCTC</p>

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>statewide importance farmland; and coordinate efforts to provide a mechanism for preservation activities.</p> <ul style="list-style-type: none"> ✓ Implementing agencies will encourage in-fill development, in place of development in rural and environmentally sensitive areas. Agencies will seek funding to prepare specific plans and related environmental documents to facilitate mixed-use development, and to allow these areas to serve as receiver sites for transfer of development rights away from environmentally sensitive lands and rural areas outside established urban growth boundaries. ✓ Implementing agencies will consider resource lands when considering project designs. Prior to the design approval of RTP and SCS projects, the implementing agency will assess the project area for agricultural resources and constraints. For federally funded projects, implementing and local agencies are required to follow the rules and regulations of Farmland Protection Policy Act including determining the impact by completing the Farmland Conversion Impact Rating form (AD- 1006). For non-federally funded projects, implementing and local agencies will assess projects for the presence of important farmlands (prime farmland, unique farmland, farmland of statewide importance), and if present, perform a Land Assessment and Site Evaluation (LESA). ✓ Implementing agencies will consider agricultural resources in all projects, and seek to avoid or minimize the encroachment and/or impact on these areas. Agencies will consider measures such as, but not limited to, relocation or redesign of site features, reduction of the project footprint, or compensation and/or preservation activities to lessen the overall impact on resource lands. Prior to final approval of each individual transportation improvement project, the implementing agency will establish inclusion into a conservation easement program, or arrange for the enrollment of agricultural lands into the Williamson Act program. 	<p>notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
<p>3.3.2 Conflict with Existing Zoning for Agriculture Use, or a Williamson Act Contract</p>	<p>✓ Following approval of the 2014 RTP and SCS, the MCTC Policy Board will form a sub-committee to analyze, discuss and provide recommendation on agricultural mitigation measures for inclusion into the transportation planning process at MCTC. Working collaboratively with the community-based organizations, interested stakeholders and</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of</p>	<p>August 2014 through August 2015</p>	<p>✓ MCTC</p>

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>professional staff, this committee discuss the formulation of policy and program language to:</p> <ul style="list-style-type: none"> ➤ Develop a methodology to help implementing agencies quantify the conversion of prime farmland, unique farmland, farmland of statewide importance, and farmland of local importance associated with their proposed projects. Develop a methodology for implementing agencies to consider preservation ratios to minimize loss of prime, unique, and statewide importance farmland; and coordinate efforts to provide a mechanism for preservation activities. ➤ Develop a methodology for implementing agencies to consider preservation ratios to minimize loss of prime, unique, and statewide importance farmland; and coordinate efforts to provide a mechanism for preservation activities. <ul style="list-style-type: none"> ✓ Implementing agencies will encourage in-fill development, in place of development in rural and environmentally sensitive areas. Agencies will seek funding to prepare specific plans and related environmental documents to facilitate mixed-use development, and to allow these areas to serve as receiver sites for transfer of development rights away from environmentally sensitive lands and rural areas outside established urban growth boundaries. ✓ Implementing agencies will consider agricultural resource lands when considering project designs. Prior to the design approval of RTP and SCS projects, the implementing agency will assess the project area for agricultural resources and constraints. For federally funded projects, implementing and local agencies are required to follow the rules and regulations of Farmland Protection Policy Act including determining the impact by completing the Farmland Conversion Impact Rating form (AD- 1006). For non-federally funded projects, implementing and local agencies will assess projects for the presence of important farmlands (prime farmland, unique farmland, farmland of statewide importance), and if present, perform a Land Assessment and Site Evaluation (LESA). ✓ Implementing agencies will consider agricultural resources in all projects, and seek to avoid or minimize the encroachment and/or impact on these areas. Agencies will consider measures such as, but not limited to, relocation or redesign of site features, reduction of the 	<p>the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>project footprint, or compensation and/or preservation activities to lessen the overall impact on resource lands. Prior to final approval of each individual transportation improvement project, the implementing agency will establish inclusion into a conservation easement program, or arrange for the enrollment of agricultural lands into the Williamson Act program.</p> <ul style="list-style-type: none"> ✓ Individual projects will be consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible. ✓ For projects in agricultural areas, project implementation agencies will contact the California Department of Conservation and the Agricultural Commissioner’s office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy. ✓ Prior to final approval of each individual improvement project, the implementing agency will avoid impacts to prime farmlands or farmlands that support crops considered valuable to the local or regional economy. 			
<p>3.3.3 Other Changes in the Existing Environment</p>	<ul style="list-style-type: none"> ✓ Following approval of the 2014 RTP and SCS, the MCTC Policy Board will form a sub-committee to analyze, discuss and provide recommendation on agricultural mitigation measures for inclusion into the transportation planning process at MCTC. Working collaboratively with the community-based organizations, interested stakeholders and professional staff, this committee discuss the formulation of policy and program language to: <ul style="list-style-type: none"> ○ Develop a methodology to help implementing agencies quantify the conversion of prime farmland, unique farmland, farmland of statewide importance, and farmland of local importance associated with their proposed projects. ○ Develop a methodology for implementing agencies to consider preservation ratios to minimize loss of prime, unique, and statewide importance farmland; and coordinate efforts to provide a mechanism for preservation activities. ✓ Implementing agencies will encourage in-fill development, in place of development in rural and environmentally sensitive areas. Agencies will 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<p>August 2014 through August 2015</p> <ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ MCTC ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>seek funding to prepare specific plans and related environmental documents to facilitate mixed-use development, and to allow these areas to serve as receiver sites for transfer of development rights away from environmentally sensitive lands and rural areas outside established urban growth boundaries.</p> <ul style="list-style-type: none"> ✓ Implementing agencies will consider agricultural resource lands when considering project designs. Prior to the design approval of RTP and SCS projects, the implementing agency will assess the project area for agricultural resources and constraints. For federally funded projects, implementing and local agencies are required to follow the rules and regulations of Farmland Protection Policy Act including determining the impact by completing the Farmland Conversion Impact Rating form (AD- 1006). For non-federally funded projects, implementing and local agencies will assess projects for the presence of important farmlands (prime farmland, unique farmland, farmland of statewide importance), and if present, perform a Land Assessment and Site Evaluation (LESA). ✓ Implementing agencies will consider agricultural resources in all projects, and seek to avoid or minimize the encroachment and/or impact on these areas. Agencies will consider measures such as, but not limited to, relocation or redesign of site features, reduction of the project footprint, or compensation and/or preservation activities to lessen the overall impact on resource lands. Prior to final approval of each individual transportation improvement project, the implementing agency will establish inclusion into a conservation easement program, or arrange for the enrollment of agricultural lands into the Williamson Act program. ✓ Individual projects will be consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible. ✓ For projects in agricultural areas, project implementation agencies will contact the California Department of Conservation and the Agricultural Commissioner’s office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy. 			

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Prior to final approval of each individual improvement project, the implementing agency will avoid impacts to prime farmlands or farmlands that support crops considered valuable to the local or regional economy. 			
AIR QUALITY				
3.4.1 Conflict with or obstruct implementation of an applicable air quality plan	<ul style="list-style-type: none"> ✓ None required 	<ul style="list-style-type: none"> ✓ Not applicable 		
3.4.2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation	<ul style="list-style-type: none"> ✓ Project implementation agencies will ensure implementation of mitigation measures to reduce PM and NOx emissions from construction sites, including: <ul style="list-style-type: none"> ➤ Maintain on-site truck loading zones. ➤ Configure on-site construction parking to minimize traffic interference and to ensure emergency vehicle access. ➤ Provide temporary traffic control during all phases of construction activities to improve traffic flow. ➤ Use best efforts to minimize truck idling to not more than two minutes during construction. ➤ Apply non-toxic soil stabilizers (according to manufacturers' specifications) to all inactive construction areas. ➤ During construction, replace ground cover in disturbed areas as quickly as possible. ➤ During construction, enclose, cover, water twice daily or apply non-toxic soil binders (according to manufacturers' specifications) to exposed piles with 5 percent or greater silt content and to all unpaved parking or staging areas or unpaved road surfaces. ➤ During the period of construction, install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. ➤ During the period of construction, assure that traffic speeds on all unpaved roads be reduced to 15 mph or less. ➤ Pave all construction access roads at least 100 feet on to the site from permanent roadways. ➤ Cover all haul trucks. ✓ Project implementation agencies will require that construction sites employ a balanced cut/fill ratio to the extent possible, thus reducing haul-truck trip emissions. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.4.3 Result in a cumulatively considerable net increase of	<ul style="list-style-type: none"> ✓ None required 	<ul style="list-style-type: none"> ✓ Not applicable 	<ul style="list-style-type: none"> ✓ 	<ul style="list-style-type: none"> ✓

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).				
3.4.4 Expose sensitive receptors to substantial pollutant concentrations.	<p>✓ As air toxics research continues, implementing agencies will utilize the tools and techniques that are developed for assessing health outcomes as a result of lifetime MSAT exposure. The potential health risks posed by MSAT exposure will continue to be factored into project-level decision making in the context of environmental review. Specifically, at the project level, implementing agencies shall require or perform air toxic risk assessments to determine mobile source air toxic impacts.</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.4.5 Create Objectionable Odors Affecting a Substantial Number of People	<p>✓ Implementing agencies will require assessment of new and existing odor sources for transportation improvement projects and future land use development projects to determine whether sensitive receptors would be exposed to objectionable odors and apply recommended applicable mitigation measures as defined by the applicable local air district and best practices.</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
		mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.5 BIOTIC RESOURCES				
3.5.1 Removal or Degradation of Sensitive Natural Communities	<ul style="list-style-type: none"> ✓ When applicable to federally-funded projects, responsible and implementing agencies will commit to improved interagency coordination and integration of the National Environmental Policy Act (NEPA) and the Clean Water Act Section 404 procedures during three stages: transportation planning, project programming, and project implementation. Affected State and local agencies will commit to ensuring the earliest possible consideration of environmental concerns pertaining to U.S. water bodies, including wetlands, at each of the three stages identified above. In addition, the agencies will place a high priority on the avoidance of adverse impacts to waters of the U.S. and associated sensitive species, including threatened and endangered species. Implementation of NEPA-404 requirements will expedite construction of necessary transportation projects, with benefits to mobility and the economy at large. The process will also enable more street and highway projects to proceed on budget and on schedule. Finally, the process will improve cooperation and efficiency of governmental operations at all levels, thereby better serving the public. ✓ Construction and operational Best Management Practices (BMPs) will be identified, installed and maintained by implementing agencies in order to prevent silt and other pollutants from entering waters and wetlands thereby degrading or destroying wildlife and/or natural habitat. BMPs may include straw bales and/or mats, temporary sedimentation basins, silt fence, sand bag check dams, dry season construction, etc. ✓ Native soils in construction areas will be removed, stockpiled separately, and replaced by implementing agencies in those areas where onsite revegetation of the native habitat is planned. ✓ Any disturbed natural areas will be replanted by implementing agencies with appropriate native vegetation following the completion of construction activities. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Responsible and Implementing agencies or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ During the individual improvement or future land use development project design phase, impacts to waters and wetlands will be minimized by implementing agencies to the greatest extent feasible. ✓ Implementing agencies will obtain and comply with appropriate regulatory requirements prior to construction. 			
<p>3.5.2 Direct Impacts on Rare, Threatened, or Endangered Plant & Wildlife Species</p>	<ul style="list-style-type: none"> ✓ Each proposed individual transportation improvement project and future land use development will consider the displacement of sensitive habitat, sensitive species, and non-native habitat. ✓ When avoidance of native vegetation removal is not possible, each transportation improvement project and future land use development shall replant disturbed areas with commensurate native vegetation of high habitat value adjacent to the project (i.e., as opposed to ornamental vegetation with relatively less habitat value). ✓ Focused sensitive plant and wildlife species and non-native habitat surveys will be conducted within suitable habitat to determine the distribution of sensitive species within the biological impact area of each transportation improvement project and future land use development. Sensitive plant and nonnative habitat surveys will be conducted during the appropriate flowering season for sensitive plant species with the potential to occur within the individual transportation improvement project or future land use development area. In all cases, impacts on special-status species and/or their habitat shall be avoided during construction to the extent feasible. ✓ If sensitive plant or wildlife species and non-native habitat are identified within the biological impact area, a Biological Resource Management Plan (BRMP) will be developed to address appropriate avoidance and minimization measures. These measures may include seed collection and salvage measures for sensitive plant species and non-native habitat, silt fencing, exclusion fencing and/or appropriate compensation where impacts cannot be fully avoided. ✓ Individual transportation improvement projects and future land use developments shall include offsite habitat enhancement or restoration to compensate for unavoidable habitat losses from the project site. ✓ Locations of sensitive species, sensitive habitat, and non-native habitat will be mapped and shown on construction drawings and identified as 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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	<p>Environmentally Sensitive Areas (ESAs). Prior to construction, these areas will be flagged and/or fenced to prevent unnecessary impacts from machinery and foot traffic.</p> <ul style="list-style-type: none"> ✓ Temporary access roads and staging areas will not be located within areas containing sensitive plant, sensitive wildlife species or non-native habitat wherever feasible, so as to avoid or minimize impacts to these species. ✓ Construction activities will be scheduled, as appropriate and feasible, to avoid sensitive times that have a greater likelihood to affect significant resources such as spawning periods for fish, nesting season for birds and/or the rainy season for riparian habitat and sediment/erosion control. ✓ All vegetation (including tall grasses) will be removed between August 16th and February 14th, if possible, to avoid potential conflicts with nesting birds. If it is not possible to remove vegetation during that time frame, a nest clearance survey will be completed prior to vegetation clearing. Any detected nests will be mapped and provided with an appropriate buffer as recommended by a qualified biologist. Construction activities within the buffer area will not be allowed until after September 15 or until fledglings have abandoned the nest. ✓ A Worker Awareness Program (environmental education) shall be developed and implemented to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. ✓ An Environmental Inspector shall be appointed to serve as a contact for issues that may arise concerning implementation of mitigation measures, and to document and report on adherence to these measures. ✓ A qualified wetland scientist shall review construction drawings as part of each project-specific environmental analysis to determine whether wetlands will be impacted, and if necessary perform a formal wetland delineation. Appropriate State and federal permits shall be obtained, but each project EIR will contain language clearly stating the provisions of such permits, including avoidance measures, restoration procedures, and in the case of permanent impacts compensatory 			

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>creation or enhancement measures to ensure a no net loss of wetland extent or function and values.</p> <ul style="list-style-type: none"> ✓ Sensitive habitats (native vegetative communities identified as rare and/or sensitive by the CDFW) and special-status plant species (including vernal pools) impacted by projects shall be restored and augmented, if impacts are temporary, at a 1.1:1 ratio (compensation acres to impacted acres). Permanent impacts shall be compensated for by creating or restoring habitats at a 3:1 ratio as close as possible to the site of the impact. ✓ When work is conducted in identified sensitive habitat areas and/or areas of intact native vegetation, construction protocols shall require the salvage of perennial plants and the salvage and stockpile of topsoil (the surface material from 6 to 12 inches deep) and shall be used in restoring native vegetation to all areas of temporary disturbance within the project area. ✓ If specific project area trees are designated as “Landmark Trees” or “Heritage Trees”, then approval for removals shall be obtained through the appropriate entity, and appropriate mitigation measures shall be developed at that time, to ensure that the trees are replaced. Due to the close proximity of these areas to sensitive wildlife habitats, all mitigation trees will use only locally-collected native species. 			
<p>3.5.3 Impacts on Rare, Threatened, or Endangered Species from Project Noise, Lighting and Deterrents</p>	<ul style="list-style-type: none"> ✓ The height, spacing, number and type of light fixtures will be selected and installed to minimize intrusive light escaping from the physical boundaries of the site. ✓ Road noise minimization methods, such as native brush and tree planting adjacent to heavy noise producing transportation facilities, will be incorporated where feasible. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
		mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.5.4 Temporary and Permanent Impacts to Terrestrial and Aquatic Wildlife Movement	<ul style="list-style-type: none"> ✓ During final design, implementing agencies will design, construct, and maintain terrestrial wildlife crossings in order to minimize barrier effects and habitat fragmentation created by individual transportation projects and future land use developments. ✓ During final design, implementing agencies will design, construct, and maintain any structure/culvert placed within a stream where endangered or threatened fish occur/may occur. The structure/culvert will not constitute a barrier to upstream or downstream movement of aquatic life, or cause an avoidance reaction by fish that impedes their upstream or downstream movement. This includes, but is not limited to, the supply of water at an appropriate depth for fish migration. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.5.5 Siltation Impacts	<ul style="list-style-type: none"> ✓ For Individual transportation and future land use development projects near water resources will implement Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport. ✓ Individual transportation and future land use development projects, implementing agencies will schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring) and to avoid the rainy season when erosion and sediment transport is increased. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.5.6 Conflict with any local policies or ordinances protecting biological resources, such as a tree	<ul style="list-style-type: none"> ✓ Implementing agencies will require project applicants to prepare biological resources assessments for specific projects proposed in areas containing, or likely to contain, protected trees or other locally protected biological resources. The assessment will be conducted by 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
preservation policy or ordinance.	<p>appropriately trained professionals pursuant to adopted protocols, and standards in the industry. Mitigation will be implemented when significance thresholds are exceeded. Mitigation will be consistent with the requirements of CEQA and/or follow applicable plans promulgated to protect species/habitat.</p> <ul style="list-style-type: none"> ✓ Implementing agencies will design projects such that they avoid and minimize direct and indirect impacts to protected trees and other locally protected resources where feasible, defined in section 15364 of the CEQA Guidelines. ✓ As part of project-level environmental review, implementing agencies will ensure that projects comply with the most recent general plans, policies, and ordinances, and conservation plans. Review of these documents and compliance with their requirements will be demonstrated in project-level environmental documentation. Review of these documents and compliance with their requirements should be demonstrated in project-level environmental documentation. 	<p>jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
3.6 CLIMATE CHANGE				
3.6.1 Increased Transportation GHG Emissions May Contribute to Climate Change	<ul style="list-style-type: none"> ✓ Through Implementation of the Regional Blueprint and the RTP and SCS, and in coordination with implementation agencies, the following mitigation measures will result in reduced GHG emissions: <ul style="list-style-type: none"> ➤ Develop land use patterns, consistent with the 2024 RTP and SCS, which encourage people to walk, bicycle, or use public transit for a significant number of their daily trips. <ul style="list-style-type: none"> ▪ Use comprehensive community plans and specific plans to ensure development is consistent and well connected by alternative transportation modes. ▪ Adopt transit-oriented or pedestrian-oriented design strategies and select areas appropriate for these designs in the general plan. ▪ Support higher density development in proximity to commonly used services and transportation facilities. ➤ Develop in a compact, efficient form to reduce vehicle miles traveled and to improve the efficiency of alternatives to the automobile consistent with the 2014 RTP and SCS. <ul style="list-style-type: none"> ▪ Use the control of public services to direct development to the most appropriate locations. ▪ Promote infill of vacant land and redevelopment sites. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Responsible Agencies

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ➤ Encourage project site designs and subdivision street and lot designs that support walking, bicycling, and transit use. <ul style="list-style-type: none"> ▪ Adopt design guidelines and standards promoting plans that encourage alternative transportation modes. ▪ Require certain sites to be created to allow convenient access by transit, bicycle, and walking. ✓ Intelligent Transportation <ul style="list-style-type: none"> ➤ Develop an Intelligent Transportation Systems strategy to implement the Integrated Performance Management System Network that will: <ul style="list-style-type: none"> ▪ Interconnect the region’s local transportation management centers, including the use of cameras, and computer hardware and software to detect and clear accidents ▪ Use technology to improve traffic signal timing in order to optimize traffic flow and transit service ▪ Involve new equipment to improve on-time transit performance and provide real-time transit information at stops and stations. ✓ Continue Development of a SCS Funding Program <p>MCTC will continue to develop a SCS Funding Program to reduce GHG emissions from transportation projects. MCTC member agencies (the cities and the County) will be eligible to apply for the funding through a formal funding application process.</p> <p>MCTC will immediately form an SCS Funding Program Committee or Task Force to define the program for funding allocation. At a minimum, the task force or committee will identify the SCS Funding Program project evaluation criteria necessary to evaluate the potential of transportation and other projects to:</p> <ul style="list-style-type: none"> ➤ Reduce GHG and air emissions ➤ Reduce VMT ➤ Reduce vehicle trips ➤ Reduce vehicle hours of delay and idling ➤ Increase transit trips ➤ Increase walkability ➤ Increase bike trips ➤ Support alternative modes or active transportation programs and services 		<ul style="list-style-type: none"> ✓ 2015 ✓ 2014 ✓ 2014 	<ul style="list-style-type: none"> ✓ MCTC and Responsible Agencies ✓ MCTC ✓ MCTC

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ➤ Identify other criteria that enables the task force or committee to clearly identify reductions in GHG emissions locally or on a regional basis ✓ Continue the Public Education Program on Individual Transportation Behavior and Climate Change Through the Valley Planners’ Network and in conjunction with key partners such as local air districts, public utility providers, area chambers of commerce and others, MCTC will continue the public information program to educate the public about the connection between individual transportation behavior and global climate change, including transportation behavior modifications the public can make to reduce their GHG emissions over time. MCTC shall continue to include information on its website that is focused on global climate change. The website shall continue to identify actions the public can take to reduce their carbon footprint, and provide web links to sources of information designed to promote alternative mode use (carpools, vanpools, public transit, bicycling, walking, and telecommuting) and other travel demand management strategies. ✓ Provide Funding for Workshop on Global Climate Change for Local Government Officials and Include in the Blueprint Toolkit MCTC will provide funding for a workshop on global climate change for local government officials that will focus on practical techniques that local governments can implement to reduce greenhouse gas emissions at the city and county level. Workshop topics shall include, but are not limited to the following: <ul style="list-style-type: none"> ➤ The basic science behind climate change and its effects on the Madera County Region ➤ Addressing the California Environmental Quality Act (CEQA) and the effects of AB 32 ➤ What cities and counties are doing to address climate change and CEQA ➤ Cost effective actions cities can take to reduce greenhouse emissions ➤ Actions being taken in the Madera County area to advance and support innovative ‘green’ business 		<ul style="list-style-type: none"> ✓ FY 2015/16 ✓ FY 2015/16 	<ul style="list-style-type: none"> ✓ MCTC ✓ MCTC

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>MCTC shall work closely with its member agencies to help them participate in the statewide Active Transportation Program (ATP) as well as develop a MPO-Level Active Transportation Program at MCTC.</p> <ul style="list-style-type: none"> ✓ Continue to Work with the SCS Implementation Committee <p>MCTC will continue to work with the RTP and SCS Roundtable as directed by the MCTC Policy Board to develop SCS implementation policies and strategies, and identify appropriate funding mechanisms. Stakeholders will be invited to attend the meetings; however, only committee members (member agencies) will have voting authority.</p> <ul style="list-style-type: none"> ✓ Project level environmental documents <p>Project level environmental documents shall analyze construction and maintenance and land use development project Greenhouse Gas (GHG) emissions.</p>		<ul style="list-style-type: none"> ✓ FY 2014-2018 ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ MCTC ✓ Implementing agency or project sponsor
3.7 CULTURAL RESOURCES				
<p>3.7.1 Impacts on Historic Resources</p>	<ul style="list-style-type: none"> ✓ As part of the appropriate environmental review of individual projects, the project implementation agencies will identify potential impacts to historic resources. A record search at the appropriate Information Center will be conducted to determine if the individual transportation improvement project or future land use development area has been previously surveyed and whether resources were identified. ✓ As necessary, prior to construction activities, the implementing agencies will obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Archaeological Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the individual transportation improvement project or future land use development area for cultural resources. ✓ Implementing agencies will comply with Section 106 of the National Historic Preservation Act if federal funding or approval is required. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register of Historic Places. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>mitigation. These mitigation measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> ➤ Carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction of any impacted historic resource, which will be conducted in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. ✓ In some instances, the following mitigation measure may be appropriate in lieu of the previous mitigation measure: <ul style="list-style-type: none"> ➤ Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, or architectural drawings, as mitigation for the effects of demolition of a resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. 			
<p>3.7.2 Construction Impacts on Archaeological Resources</p>	<ul style="list-style-type: none"> ✓ As part of the appropriate environmental review of individual projects, the implementation agencies will consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. ✓ Prior to construction activities, the implementation agencies will obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. ✓ As necessary prior to construction activities, the implementation agencies will obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for cultural resources. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ If the record search indicates that the project is located in an area rich with cultural materials, the implementing agencies will retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. ✓ Construction activities and excavation will be conducted to avoid cultural resources (if found). If avoidance is not feasible, further work may need to be done to determine the importance of a resource. The implementation agencies will obtain a qualified archaeologist familiar with the local archaeology, and/or an architectural historian should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under State or federal guidelines, impacts on the cultural resource will be mitigated. ✓ The project implementation agencies will stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources. 			
3.7.3 Construction Impacts on Paleontological Resources	<ul style="list-style-type: none"> ✓ As part of the appropriate environmental review of individual projects, the project implementation agencies will obtain a qualified paleontologist to identify and evaluate paleontological resources where potential impacts are considered high; the paleontologist will also conduct a field survey in these areas. ✓ Construction activities will avoid known paleontological resources, especially if the resources in a particular lithic unit formation have been determined through detailed investigation to be unique. If avoidance is not feasible, paleontological resources will be excavated by the qualified paleontologist and given to a local agency, State University, or other applicable institution, where they can be displayed. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.7.4 Impacts on Human Remains	<ul style="list-style-type: none"> ✓ If the remains are of Native American origin, the coroner will contact the Native American Heritage Commission in order to ascertain the proper descendants from the deceased individual. The coroner will 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods, which may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.</p> <ul style="list-style-type: none"> ✓ If the Native American Heritage Commission was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the commission, in which case: <ul style="list-style-type: none"> ➤ The landowner or his authorized representative will obtain a Native American monitor - and an archaeologist, if recommended by the Native American monitor - and reburial of the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: <ul style="list-style-type: none"> ▪ The Native American Heritage Commission is unable to identify a descendent. ▪ The descendant identified fails to make a recommendation. ▪ The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner. 	<p>transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
3.8 ENERGY AND ENERGY CONSERVATION				
<p>3.8.1 Energy Consumption and Conservation Impacts</p>	<ul style="list-style-type: none"> ✓ Implementing agencies shall review energy impacts as part of any CEQA-required project-level environmental analysis and specify appropriate mitigation measures for any identified energy impacts. ✓ During the design and approval of transportation improvements and future land use development projects, the following energy efficiency measures shall be incorporated when applicable: <ul style="list-style-type: none"> ➤ The design or purchase of any lighting fixtures shall achieve energy reductions beyond an estimated baseline energy use for such lighting. ➤ LED technology shall be used for all new or replaced traffic lights, rail signals, and other new development lighting features compatible with LED technology. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Implementing agencies will consider various best practices and technological improvements that can reduce the consumption of fossil fuels such as: <ul style="list-style-type: none"> ➤ Expanding light-duty vehicle retirement programs ➤ Increasing commercial vehicle fleet modernization ➤ Implementing driver training modules on fuel consumption ➤ Replacing gasoline powered mowers with electric mowers ➤ Reducing idling from construction equipment ➤ Incentivizing alternative fuel vehicles and equipment ➤ Developing infrastructure for alternative fueled vehicles ➤ Implementing truck idling rules, devices, and truck-stop electrification ➤ Requiring electric truck refrigerator units ➤ Reducing locomotives fuel use ➤ Modernizing older off-road engines and equipment ➤ Encouraging freight mode shift ➤ Limit use and develop fleet rules for construction equipment ➤ Requiring zero-emission forklifts ✓ Implementing agencies will include energy analyses in environmental documentation and general plans with the goal of conserving energy through the wise and efficient use of energy. For any identified energy impacts, appropriate mitigation measures will be developed and monitored. MCTC recommends the use of Appendix F, Energy Conservation, of the <i>CEQA Guidelines</i>. ✓ Project and land use development implementing agencies will streamline permitting and provide public information to facilitate accelerated construction of solar and wind power. ✓ Project and land use development implementing agencies will adopt a “Green Building Program” to promote green building standards. Green buildings can reduce local environmental impacts, regional air pollutant emissions and global greenhouse gas emissions. Green building standards involve everything from energy efficiency, usage of renewable resources and reduced waste generation and water usage. For example, water-related energy use consumes 19 percent of the state’s electricity. The residential sector accounts for 48 percent of both the electricity and natural gas consumption associated with urban water use. While interest in green buildings has been growing for some 	<p>mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		

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	<p>time, cost has been a main consideration as it may cost more up front to provide energy efficient building components and systems. Initial costs can be a hurdle even when the installed systems will save money over the life of the building. Energy efficiency measures can reduce initial costs, for example, by reducing the need for over-sized air conditioners to keep buildings comfortable. Undertaking a more comprehensive design approach to building sustainability can also save initial costs through reuse of building materials and other means. A comprehensive study of the value of green building savings is the 2003 report to California’s Sustainable Building Task Force. In the words of the report: “While the environmental and human health benefits of green building have been widely recognized, this comprehensive report confirms that minimal increases in upfront costs of about 2% to support green design would, on average, result in life cycle savings of 20% of total construction costs -- more than ten times the initial investment. For example, an initial upfront investment of up to \$100,000 to incorporate green building features into a \$5 million project would result in a savings of \$1 million in today’s dollars over the life of the building.”</p> <ul style="list-style-type: none"> ✓ Where identified, local governments will alter zoning to improve jobs/housing balance, create communities where people live closer to work, and bike, walk, and take transit as a substitute for personal auto travel consistent and in support of the SCS. Creating walkable, transit oriented modes would generally reduce energy use and greenhouse gas emissions. Residential energy use (electricity and natural gas) accounts for 7 percent of California’s greenhouse gas emissions. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods. In addition, mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year. Furthermore, studies have shown that the type of housing (such as multi-family) and the size of a house have strong relationships to residential energy use. Residents of single-family detached housing consume over 20 percent more primary energy than those of multifamily housing and 9 percent more than those of single-family attached housing. 			

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	<ul style="list-style-type: none"> ✓ Project and land use development implementing agencies will increase the number of AFVs (i.e., vehicles not powered strictly by gasoline or diesel fuel) both in publically owned vehicles, as well as those owned by franchisees of these agencies, such as trash haulers, green waste haulers, street sweepers, and curbside recyclable haulers. ✓ Bid solicitations for construction of projects will preference the use of alternative formulations of cement and asphalt with reduced GHG emissions to the extent that such cement and asphalt formulations are available at a reasonable cost in the marketplace. Solicitations will also preference the recycling of construction waste and debris if market conditions permit. ✓ MCTC shall continue to develop, in coordination with the California Air Resources Board, a data and information collection and analysis system that provides an understanding of the energy demand and greenhouse gas emissions in the Madera region. ✓ All mitigation measures listed in Chapter 3, Section 3.6 (Climate Change) of this EIR, are incorporated by reference and shall be implemented by implementing agencies to address energy conservation impacts. 		<ul style="list-style-type: none"> ✓ Ongoing 	<ul style="list-style-type: none"> ✓ MCTC
3.9 GEOLOGY/SOILS/MINERAL RESOURCES				
3.9.1 Damaged Transportation Infrastructure and other Land Use Development Structures from Seismic Activity	<ul style="list-style-type: none"> ✓ Implementing agencies will be responsible for ensuring that transportation improvement projects and future land use development projects are built to the seismic standards contained in the most recent edition of the Uniform Building Code (UBC). ✓ Implementing agencies will ensure that transportation improvement projects and future land use development projects located within or across active fault zones comply with design requirements, published by the CGS, as well as local, regional, state, and federal design criteria for construction of projects in seismic areas. ✓ Implementing agencies will guarantee that geotechnical analysis is conducted within construction areas to establish soil types and local faulting prior to the construction of transportation improvements and future land use developments is subject to geotechnical analysis. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
3.9.2 Slope Failure and Erosion Due to Project Construction	<ul style="list-style-type: none"> ✓ Implementing agencies will ensure that individual transportation improvement projects and future land use developments provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. ✓ Transportation improvement project and future land use development design features will include measures to reduce erosion from storm water. ✓ Road cuts will be designed to maximize the potential for revegetation. ✓ Implementing agencies will ensure that transportation improvement projects and future land use developments avoid landslide areas and potentially unstable slopes wherever feasible. ✓ Where practicable, transportation improvement project and future land use development designs that would permanently alter unique geologic features will be avoided. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.9.3 Subsidence and Presence of Expansive Soils	<ul style="list-style-type: none"> ✓ Implementing agencies will ensure that geotechnical investigations are conducted by a qualified geologist to identify the potential for subsidence and expansive soils. ✓ Implementing agencies will take corrective measures, such as structural reinforcement and replacing soil with engineered fill, will be implemented in individual transportation improvement project and future land use development site designs, where applicable. ✓ Implementing agencies will ensure that, prior to preparing individual transportation improvement project and future land use development site designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.9.4 Loss of Availability of a Designated Mineral Resource that would be of Value to the Region and the Residents of the State	<ul style="list-style-type: none"> ✓ The implementing agency will protect against the loss of availability of a designated mineral resource through identification of locations with designated mineral resources and adoption and implementation of policies to conserve land that is most suitable for mineral resource extraction from development of incompatible uses. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> Where possible, transportation improvement project and future land use development sites will be designed by responsible agencies to limit potential impacts on mineral resource lands. 	<p>the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
3.9.5 Loss of Availability of a Locally-Important Mineral Resource Recovery Site Delineated on a Local General Plan, Specific Plan, or Other Land Use Plan	<ul style="list-style-type: none"> The implementing agency will protect against the loss of availability of a locally-important mineral resource recovery site through policies incorporated into general plans, specific plans, and other land use plans. Such policies would provide protection of mineral resource production and extraction activities. 	<ul style="list-style-type: none"> The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> Ongoing over the life of the Plan 	<ul style="list-style-type: none"> Implementing agency or project sponsor
3.10 HAZARDOUS MATERIALS				
3.10.1 Significant Hazard to the Public or the Environment Through the Routine Transport, Use, or Disposal of Hazardous Materials	<ul style="list-style-type: none"> The implementation agency and project sponsors shall comply with all applicable laws, regulations, and health and safety standards set forth by federal, state, and local authorities that regulate the proper handling of such materials and their containers to the routine transport, use, and disposal of hazardous materials does not create a significant hazard to the public or the environment. 	<ul style="list-style-type: none"> The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. 	<ul style="list-style-type: none"> Ongoing over the life of the Plan 	<ul style="list-style-type: none"> Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
		Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.10.2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	<ul style="list-style-type: none"> ✓ Implementing agencies shall encourage the USDOT, the Office of Emergency Services, and Caltrans to continue to conduct driver safety training programs and encourage the private sector to continue conducting driver safety training. ✓ Implementing agencies shall encourage the USDOT and the CHP to continue to enforce speed limits and existing regulations governing goods movement and hazardous materials transportation. ✓ The implementing agencies and project sponsors shall comply with all applicable laws, regulations, and health and safety standards set forth by federal, state, and local authorities that regulate the proper handling of such materials and their containers to the routine transport, use, and disposal of hazardous materials does not create a significant hazard to the public or the environment. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.10.3 Disturb contaminated property during the construction of new transportation or future land use developments or the expansion of existing transportation facilities or land use developments.	<ul style="list-style-type: none"> ✓ Prior to approval of any improvement project or future land use development project, the project implementation agency shall consult all known databases of contaminated sites and undertake a standard Phase 1 Environmental Site Assessment in the process of planning, environmental clearance, and construction for projects included in the 2014 RTP and SCS. If contamination is found the implementing agency shall coordinate clean up and/or maintenance activities. ✓ Where contaminated sites are identified, the project implementation agency shall develop appropriate mitigation measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. ✓ Local agencies will contact the Chevron Environmental Management Company (CEMC) to determine whether an improvement or future land use development project may be in the vicinity of the Tidewater Oil Company or Standard Oil Company historical pipeline alignments. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
3.10.4 Emit Hazardous Materials within One-Quarter Mile of a School	✓ The implementing agencies shall comply with all applicable laws, regulations, and health and safety standards set forth by federal, state, and local authorities that regulate the proper handling of such materials and their containers to the routine transport, use, and disposal of hazardous materials does not create a significant hazard to the public or the environment.	✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor
3.10.5 For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area.	✓ Implementing agencies will comply with ALUC plans as a part of their land use approval authority through policies incorporated into general plans, specific plans, and other land use plans. Such policies would provide protection for a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area.	✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor
3.10.6 For a project located within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area.	✓ Implementing agencies will analyze and adhere to all safety and compatibility issues as a part of their land use approval authority through policies incorporated into general plans, specific plans, and other land use plans. Such policies would provide protection for a project located within an airport land use plan, or where such a plan	✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area.	over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.10.7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	✓ Implementing agencies will adhere to all emergency plans as a part of their land use approval authority through policies incorporated into general plans, specific plans, and other land use plans. Such policies would provide protection for a project to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor
3.10.8 Expose people or structures to a significant risk of loss, injury or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands.	✓ Implementing agencies will analyze and adhere to all safety and compatibility issues as a part of their design and construction of transportation facilities and their land use approval authority through policies incorporated into general plans, specific plans, and other land use plans. Such policies would provide protection for a project located within wild land areas.	✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible.	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
		Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.11 HYDROLOGY & WATER RESOURCES				
3.11.1 Violate Regional Water Quality Control Board water quality standards or waste discharge requirements	<ul style="list-style-type: none"> ✓ Improvement projects and new development will include upgrades to storm water drainage facilities to accommodate increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce velocity. ✓ Transportation network improvements and future land use developments will comply with local, state and federal floodplain regulations. Proposed transportation improvements and applicable new developments will be engineered by responsible agencies to accommodate storm drainage flow. ✓ Responsible agencies will ensure that operational best management practices for street cleaning, litter control, and catch basin cleaning are provided to prevent water quality degradation. Responsible agencies implementing projects requiring continual water removal facilities will provide monitoring systems including long-term administrative procedures to ensure proper operations for the life of the Project. ✓ Responsible agencies will ensure that new facilities include water quality control features such as drainage channels, detention basins, and vegetated buffers to prevent pollution of adjacent water resources by runoff. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.11.2 Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level	<ul style="list-style-type: none"> ✓ Transportation network improvements and future land use developments will comply with local, state and federal floodplain regulations. Proposed transportation improvements and applicable new developments will be engineered by responsible agencies to accommodate storm drainage flow. ✓ Responsible agencies will ensure that operational best management practices for street cleaning, litter control, and catch basin cleaning are provided to prevent water quality degradation. Responsible agencies implementing projects requiring continual water removal facilities will 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>provide monitoring systems including long-term administrative procedures to ensure proper operations for the life of the Project.</p>	<p>Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
<p>3.11.3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site</p>	<p>✓ Prior to construction within the vicinity of a watercourse, the project sponsor can and will obtain all necessary regulatory permits and authorizations from the U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), California Department of Fish and Game, California Coastal Commission, and local jurisdictions, and will comply with all conditions issued by applicable agencies. Required permit approvals and certifications may include, but not be limited to the following:</p> <ul style="list-style-type: none"> ➤ U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act. ➤ Regional Water Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above. ➤ California Department of Fish and Game (CDFG): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFG. <p>A qualified environmental consultant can and will be retained and paid for by the project sponsor to make site visits as necessary; and as a follow-up, submit to the Lead Agency a letter certifying that all required conditions have been instituted during the grading activities.</p> <p>✓ Project sponsors can and will comply with the State-wide construction storm water discharge permit requirements including preparation of Storm Water Pollution Prevention Plans for transportation improvement construction projects. Roadway construction projects can and will comply with the Caltrans storm water discharge permit. BMPs can and will be identified and implemented to manage site erosion, wash water runoff, and spill control.</p> <p>✓ Project sponsors can and will implement BMPs to reduce erosion, sedimentation, and water quality impacts during construction to the</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>maximum extent practicable. Plans demonstrating BMPs will be submitted for review and approval by the lead agency. At a minimum, the project sponsor can and will provide filter materials deemed acceptable to the lead agency at nearby catch basins to prevent any debris and dirt from flowing into the local storm drain system and creeks.</p> <ul style="list-style-type: none"> ✓ Project sponsors can and will submit an erosion and sedimentation control plan for review and approval by the appropriate government agency. All work will incorporate all applicable BMPs for the construction industry, including BMPs for dust, erosion and water quality. The measures will include, but are not limited to, the following: <ul style="list-style-type: none"> ➤ On sloped properties, the downhill end of the construction area must be protected with silt fencing (such as sandbags, filter fabric, silt curtains, etc.) and hay bales oriented parallel to the contours of the slope (at a constant elevation) to prevent erosion into the street, gutters, storm drains. ➤ In accordance with an approved erosion control plan, the project sponsor will implement mechanical and vegetative measures to reduce erosion and sedimentation, including appropriate seasonal maintenance. One hundred (100) percent degradable erosion control fabric will be installed on all graded slopes to protect and stabilize the slopes during construction and before permanent vegetation gets established. All graded areas will be temporarily protected from erosion by seeding with fast growing annual species. All bare slopes must be covered with staked tarps when rain is occurring or is expected. ➤ Minimize the removal of natural vegetation or ground cover from the site in order to minimize the potential for erosion and sedimentation problems. Maximize the replanting of the area with native vegetation as soon as possible. ➤ Install filter materials acceptable to the appropriate agency at the storm drain inlets nearest to the project site prior to the start of the wet weather season; site dewatering activities; street washing activities; saw cutting asphalt or concrete; and in order to retain any debris flowing into the storm drain system. Filter materials will be maintained and/or replaced as necessary to ensure effectiveness and prevent street flooding. 			

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	<ul style="list-style-type: none"> ➤ Ensure that concrete/granite supply trucks or concrete/plaster finishing operations do not discharge wash water into water courses, street gutters, or storm drains. ➤ Direct and locate tool and equipment cleaning so that wash water does not discharge into the street, gutters, or storm drains. ➤ Create a contained and covered area on the site for storage of bags of cement, paints, flammables, oils, fertilizers, pesticides, or any other materials used on the project site that have the potential for being discharged to the storm drain system by the wind or in the event of a material spill. No hazardous waste material will be stored on-site. ➤ Gather all construction debris on a regular basis and place them in a dumpster or other container which is emptied or removed on a weekly (or other interval approved by the lead agency) basis. When appropriate, use tarps on the ground to collect fallen debris or splatters that could contribute to stormwater pollution. ➤ Remove all dirt, gravel, refuse, and green waste from the sidewalk, street pavement, and storm drain system adjoining the project site. During wet weather, avoid driving vehicles off paved areas and other outdoor work. ➤ As appropriate, broom sweep the street pavement adjoining the project site on a daily basis. Caked-on mud or dirt will be scraped from these areas before sweeping. At the end of each workday, the entire site must be cleaned and secured against potential erosion, dumping, or discharge to the street, gutter, and/or storm drains. ➤ All erosion and sedimentation control measures implemented during construction activities, as well as construction site and materials management will be in strict accordance with the control standards listed in the latest edition of the Erosion and Sediment Control Field Manual published by the RWQB. ➤ All erosion and sedimentation control measures will be monitored regularly by the project sponsor. If measures are insufficient to control sedimentation and erosion then the project sponsor will develop and implement additional and more effective measures immediately. 			

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
<p>3.11.4 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site</p>	<ul style="list-style-type: none"> ✓ Prior to construction, and when a potential drainage issue is known, a drainage study will be conducted by responsible agencies for new capacity-increasing projects and new land use developments, where applicable. Drainage systems will be designed to maximize the use of detention basins, vegetated areas, and velocity dissipaters to reduce peak flows where possible. Transportation and new development improvements will comply with federal, state and local regulations regarding storm water management. State-owned freeways must comply with Storm Water Discharge NPDES permit for Caltrans facilities. ✓ Responsible agencies will ensure that new facilities include water quality control features such as drainage channels, detention basins, and vegetated buffers to prevent pollution of adjacent water resources by runoff. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
<p>3.11.5 Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff</p>	<ul style="list-style-type: none"> ✓ Project sponsors can and will ensure that new facilities include structural water quality control features such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits. ✓ Drainage of roadway runoff can and will comply with Caltrans' storm water discharge permit. Wherever possible, roadways can and will be designed to convey storm water through vegetated median strips that provide detention capacity and allow for infiltration before reaching culverts. ✓ Project sponsors can and will assure projects mitigate for changes to the volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects will not cause or contribute to conditions 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>that degrade the physical integrity or ecological function of any downstream receiving waters.</p> <ul style="list-style-type: none"> ✓ Impacts can and will be reduced to the extent possible by providing culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. ✓ Project sponsors of improvement projects on existing facilities can and will include upgrades to stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs can and will be completed to eliminate increases in peak flow rates from current levels. ✓ Local jurisdictions can and will encourage Low Impact Development and incorporation of natural spaces that reduce, treat, infiltrate and manage storm water runoff flows in all new developments, where practical and feasible. 			
3.11.6 Otherwise substantially degrade water quality	<ul style="list-style-type: none"> ✓ Improvement projects along existing facilities and future land use developments will include upgrades to storm water drainage facilities to accommodate increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce velocity. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.11.7 Place housing within a 100-year flood hazard area as mapped on a federal Flood	<ul style="list-style-type: none"> ✓ Prior to construction, and when a potential drainage issue is known, a drainage study will be conducted by responsible agencies for new 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map	<p>capacity-increasing projects and new land use developments, where applicable. Drainage systems will be designed to maximize the use of detention basins, vegetated areas, and velocity dissipaters to reduce peak flows where possible. Transportation and new development improvements will comply with federal, state and local regulations regarding storm water management. State-owned freeways must comply with Storm Water Discharge NPDES permit for Caltrans facilities.</p> <ul style="list-style-type: none"> ✓ Responsible agencies will ensure that new facilities include water quality control features such as drainage channels, detention basins, and vegetated buffers to prevent pollution of adjacent water resources by runoff. ✓ Letters of Map Revision (LOMR) will be prepared and submitted to FEMA (when applicable) by responsible agencies where construction would occur within 100-year floodplains. The LOMR will include revised local base flood elevations for projects constructed within flood-prone areas. 	<p>jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
3.11.8 Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam	<ul style="list-style-type: none"> ✓ MCTC will encourage implementing and local agencies to conduct or require project-specific hydrology studies for projects proposed to be constructed within floodplains to demonstrate compliance with applicable federal, state, and local agency flood-control regulations. These studies should identify project design features or mitigation measures that reduce impacts to either floodplains or flood flows such that the project is consistent with federal, state, and local regulations and laws related to development in the floodplain. ✓ MCTC will encourage implementing and local agencies to, the extent feasible and appropriate, prevent development in flood hazard areas that do not have appropriate protections. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ MCTC and Implementing agency or project sponsor
3.11.9 Place within a 100-year flood hazard area structures which would impede or redirect flood flows	<ul style="list-style-type: none"> ✓ MCTC will encourage implementing and local agencies to conduct or require project-specific hydrology studies for projects proposed to be constructed within floodplains to demonstrate compliance with applicable federal, state, and local agency flood-control regulations. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ MCTC and Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>These studies should identify project design features or mitigation measures that reduce impacts to either floodplains or flood flows such that the project is consistent with federal, state, and local regulations and laws related to development in the floodplain.</p> <p>✓ MCTC will encourage implementing and local agencies to, the extent feasible and appropriate, prevent development in flood hazard areas that do not have appropriate protections.</p>	<p>jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
3.11.10 Inundation by seiche, tsunami, or mudflow	✓ Not applicable	✓ Not applicable	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor
3.12 LAND USE & PLANNING				
3.12.1 Physically Divide a Community	<p>✓ Individual transportation and future land use development projects will be consistent with local transportation system and land use plans and policies that designate areas for urban land use and transportation improvements, as identified by the agency with jurisdiction over said land(s).</p> <p>✓ Prior to final approval of each individual transportation improvement project and future land use development project, the implementing agency will conduct the appropriate transportation improvement project-specific and future land use development-specific environmental review, to address impacts from land use and transportation system projects that may physically divide a community.</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor
3.12.2 Land Use Impacts	<p>✓ Individual transportation and future land use development projects will be consistent with local land use plans and policies that designate areas for urban and rural land use and preserve recreational, open space, and other lands.</p> <p>✓ Prior to final approval of each individual transportation or other public facility improvement project, the project implementing agency or local</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and</p>	✓ Ongoing over the life of the Plan	✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	jurisdiction shall conduct the appropriate project-specific environmental review, including a determination of the consistency of such improvement projects with other adopted plans, policies, rules and regulations. Such determination shall also consider the potential land use and public services demands and impacts on agricultural activities and the preservation of agricultural lands resulting from the potential growth inducement of transportation or other public facility improvement project and shall identify mitigation measures that will reduce the impacts to a level of less than significant.	direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.12.3 Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated	<ul style="list-style-type: none"> ✓ Project and future land use development implementation agencies will ensure that projects and future land use developments are consistent with federal, state, and local plans that preserve open space and recreation. ✓ Project and future land use development implementation agencies will identify open space and recreation areas that could be preserved and will include mitigation measures (such as dedication or payment of in-lieu fees) for the loss of open space. ✓ Prior to final approval of each individual improvement and future land use development project, the implementing agency will conduct the appropriate improvement project- and land use development-specific environmental review, including consideration of loss of open space and recreation. ✓ For projects that require approval or funding by the U.S. Department of Transportation, project implementation agencies will comply with Section 4(f) of the U.S. Department of Transportation Act. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.12.4 Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment	<ul style="list-style-type: none"> ✓ Project and future land use development implementation agencies will ensure that projects and future land use developments are consistent with federal, state, and local plans that preserve open space and recreation. ✓ Project and future land use development implementation agencies will identify open space and recreation areas that could be preserved and will include mitigation measures (such as dedication or payment of in-lieu fees) for the loss of open space. ✓ Prior to final approval of each individual improvement and future land use development project, the implementing agency will conduct the 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>appropriate improvement project- and land use development-specific environmental review, including consideration of loss of open space and recreation.</p> <ul style="list-style-type: none"> ✓ Project and future land use development implementation agencies will conduct the appropriate project-specific environmental review, including consideration of loss of open space. Potential significant impacts to open space shall be mitigated, as feasible. The project sponsors or local jurisdiction can and will be responsible for ensuring adherence to the mitigation measures prior to construction. ✓ For projects that require approval or funding by the U.S. Department of Transportation, project implementation agencies will comply with Section 4(f) of the U.S. Department of Transportation Act. 	<p>Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
3.13 NOISE				
<p>3.13.1 Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies</p>	<ul style="list-style-type: none"> ✓ As part of the implementing agency's appropriate environmental review of each project, a project specific noise evaluation shall be conducted and appropriate mitigation identified and implemented. ✓ Implementing agencies will employ, where their authority permits, land use planning measures, such as zoning, restrictions on development, site design, and use of buffers to ensure that future development is compatible with adjacent transportation facilities and other noise generating land uses. ✓ Implementing agencies shall, to the extent feasible and practicable, maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other future noise generating facilities. ✓ Implementing agencies will construct sound reducing barriers between noise sources and noise sensitive land uses. Sound barriers can be in the form of earth-berms or soundwalls. Constructing roadways so as appropriate and feasible that they are depressed below-grade of the existing sensitive land uses also creates an effective barrier between the roadway and sensitive receptors. ✓ Implementing agencies shall, to the extent feasible and practicable, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Implementing agencies shall implement, to the extent feasible and practicable, speed limits and limits on hours of operation of rail and transit systems, where such limits may reduce noise impacts. ✓ Passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations will be located away from sensitive receptors. 			
<p>3.13.2 Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels.</p>	<ul style="list-style-type: none"> ✓ As part of the implementing agency’s appropriate environmental review of each project, a project specific noise evaluation shall be conducted and appropriate mitigation identified and implemented. ✓ Implementing agencies will employ, where their authority permits, land use planning measures, such as zoning, restrictions on development, site design, and use of buffers to ensure that future development is compatible with adjacent transportation facilities and other noise generating land uses. ✓ Implementing agencies shall, to the extent feasible and practicable, maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other future noise generating facilities. ✓ Implementing agencies will construct sound reducing barriers between noise sources and noise sensitive land uses. Sound barriers can be in the form of earth-berms or soundwalls. Constructing roadways so as appropriate and feasible that they are depressed below-grade of the existing sensitive land uses also creates an effective barrier between the roadway and sensitive receptors. ✓ Implementing agencies shall, to the extent feasible and practicable, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise. ✓ Implementing agencies shall implement, to the extent feasible and practicable, speed limits and limits on hours of operation of rail and transit systems, where such limits may reduce noise impacts. ✓ Passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations will be located away from sensitive receptors. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
3.13.3 A substantial permanent increase in ambient noise levels	<ul style="list-style-type: none"> ✓ As part of the implementing agency’s appropriate environmental review of each transportation or land use development project, a project specific noise evaluation shall be conducted and appropriate mitigation identified and implemented. ✓ Implementing agencies shall employ, where their authority permits, land use planning measures, such as zoning, restrictions on development, site design, and use of buffers to ensure that future development is compatible with adjacent transportation facilities and other noise generating uses. ✓ Implementing agencies shall, to the extent feasible and practicable, maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and future noise generating land uses. ✓ Implementing agencies will construct sound reducing barriers between noise sources and noise sensitive land uses. Sound barriers can be in the form of earth-berms or soundwalls. Constructing roadways so as appropriate and feasible that they are depressed below-grade of the existing sensitive land uses also creates an effective barrier between the roadway and sensitive receptors. ✓ Implementing agencies shall, to the extent feasible and practicable, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise. ✓ Implementing agencies shall implement, to the extent feasible and practicable, speed limits and limits on hours of operation of rail and transit systems, where such limits may reduce noise impacts. ✓ Passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations will be located away from sensitive receptors. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
3.13.4 A substantial temporary or periodic increase in ambient noise levels	<ul style="list-style-type: none"> ✓ Implementing agencies will comply with all local sound control and noise level rules, regulations, and ordinances. ✓ Implementing agencies will limit the hours of construction to between 6:00 a.m. and 8:00 p.m. on Monday through Friday and between 7:00 a.m. and 8:00 p.m. on weekends. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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	<ul style="list-style-type: none"> ✓ Equipment and trucks used for construction will utilize the best available noise control techniques (including mufflers, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds) in order to minimize construction noise impacts. ✓ Impact equipment (e.g., jackhammers, pavement breakers, and rock drills) used for individual improvement project or land use development construction will be hydraulically or electrical powered wherever feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves will be used where feasible, and this could achieve a reduction of 5 dBA. Quieter procedures will be used such as drilling rather than impact equipment whenever feasible. ✓ Implementing agencies will ensure that stationary noise sources will be located as far from sensitive receptors as possible. If they must be located near existing receptors, they will be adequately muffled. ✓ Implementing agencies will designate a complaint coordinator responsible for responding to noise complaints received during the construction phase. The name and phone number of the complaint coordinator will be conspicuously posted at construction areas and on all advanced notifications. This person will be responsible for taking steps required to resolve complaints, including periodic noise monitoring, if necessary. ✓ Noise generated from any rock-crushing or screening operations performed within 3,000 feet of any occupied residence will be mitigated by the individual improvement project proponent by strategic placement of material stockpiles between the operation and the affected dwelling or by other means approved by the local jurisdiction. ✓ Implementing agencies will direct contractors to implement appropriate additional noise mitigation measures including, but not limited to, changing the location of stationary construction equipment, shutting off idling equipment, rescheduling construction activity, 	<p>direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		

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	<p>notifying adjacent residents in advance of construction work, and installing acoustic barriers around stationary construction noise sources to comply with local noise control requirements.</p> <ul style="list-style-type: none"> ✓ Implementing agencies will implement use of portable barriers during construction of subsurface barriers, debris basins, and storm water drainage facilities. ✓ No pile-driving or blasting operations will be performed within 3,000 feet of an occupied residence on Sundays, legal holidays, or between the hours of 8:00 p.m. and 8:00 a.m. on other days. Any variance from this condition will be obtained from the individual improvement project or new land use development proponent and must be approved by the local jurisdiction. ✓ Wherever possible, sonic or vibratory pile drivers will be used instead of impact pile drivers, (sonic pile drivers are only effective in some soils). If sonic or vibratory pile drivers are not feasible, acoustical enclosures will be provided as necessary to ensure that pile-driving noise does not exceed speech interference criterion at the closest sensitive receptor. ✓ In residential areas, pile driving will be limited to daytime working hours. ✓ Engine and pneumatic exhaust controls on pile drivers will be required as necessary to ensure that exhaust noise from pile driver engines are minimized to the extent feasible. ✓ Where feasible, pile holes will be pre-drilled to reduce potential noise and vibration impacts. 			
<p>3.13.5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.</p>	<ul style="list-style-type: none"> ✓ Compliance with Occupational Safety and Health Administration’s (OSHA) hearing conservation amendment. The Permissible Exposure Level (PEL) is defined as an 8-hour time-weighted average sound level of 90 dBA integrating all sound levels from at least 90 dBA to at least 140 dBA. Project implementing agencies will comply with all local sound control and noise level rules, regulations, and ordinances. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
		evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.13.6 For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.	<p>✓ Compliance with Occupational Safety and Health Administration’s (OSHA) hearing conservation amendment. The Permissible Exposure Level (PEL) is defined as an 8-hour time-weighted average sound level of 90 dBA integrating all sound levels from at least 90 dBA to at least 140 dBA. Project implementing agencies will comply with all local sound control and noise level rules, regulations, and ordinances.</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.14 POPULATION, HOUSING & EMPLOYMENT				
3.14.1 Impacts on Regional Growth and Dispersion	<p>✓ Local agencies will be encouraged to update general, area, community and specific plans to reflect projects included in the 2014 RTP and future land use allocations reflected in the SCS.</p> <p>When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ MCTC and Implementing agency or project sponsor</p>

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
<p>3.14.2 Impacts on Community Displacement</p>	<ul style="list-style-type: none"> ✓ Local agencies will be encouraged to update general, area, community and specific plans to reflect projects included in the 2014 RTP and future land use allocations reflected in the SCS. <p>When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.</p> ✓ For projects with the potential to displace homes or businesses, project and future development implementation agencies will evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. An iterative design and impact analysis would help where impacts to persons or businesses are involved. Potential impacts will be minimized to the extent feasible. ✓ Project implementation agencies will identify businesses and residences to be displaced. As required by law, relocation and assistance will be provided to displaced residents and businesses, in accordance with the federal Uniform Relocation and Real Property Acquisition Policies Act of 1970 and the State of California Relocation Assistance Act, as well as any applicable City and County policies. ✓ Project implementation agencies will develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods. 	<p>mitigation strategies intended to avoid or reduce the significant impacts identified.</p> <ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan ✓ Over the life of the Plan ✓ Over the life of the Plan ✓ Over the life of the Plan 	<ul style="list-style-type: none"> ✓ MCTC and Implementing agency or project sponsor ✓ Implementing agency or project sponsor ✓ Implementing agency or project sponsor ✓ Implementing agency or project sponsor
<p>3.14.3 Disrupt or Divide Communities</p>	<ul style="list-style-type: none"> ✓ Project implementation agencies will design new transportation facilities that protect access to existing community facilities. During the design phase of the individual improvement project, community amenities and facilities should be identified and access to them considered in the design of the individual improvement project. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Project implementation agencies will design roadway improvements, in a manner that minimizes barriers to pedestrians and bicyclists. During the design phase, pedestrian and bicycle routes will be determined that permit easy connections to community facilities nearby in order not to divide the communities. 	<p>direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
3.15 PUBLIC UTILITIES, OTHER UTILITIES & SERVICES SYSTEMS				
<p>3.15.1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks, and other public facilities</p>	<ul style="list-style-type: none"> ✓ Prior to construction, the project implementation agency will ensure that all necessary local and state permits are obtained. In addition, the individual improvement project proponent or local jurisdiction shall be responsible for completing a school district bus transportation routing and schedules analysis and study to determine the project-specific impacts on school district bus routing and schedules and provide the mitigation measures that shall reduce the impacts to a level of less-than-significant. The project implementation agency also will comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans should include the following requirements: <ul style="list-style-type: none"> ➤ Identify all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. ➤ Develop circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. ➤ Schedule truck trips outside of peak morning and evening commute hours. ➤ Limit lane closures during peak hours to the extent possible. ➤ Use haul routes, minimizing truck traffic on local roadways, to the extent possible. <ul style="list-style-type: none"> ➤ Include detours for bicycles and pedestrians in all areas potentially affected by individual improvement project construction. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ➤ Install traffic control devices as specified in the Caltrans Manual of Traffic Controls for Construction and Maintenance Work Zones. ➤ Develop and implement access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. Access plans will be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions will be asked to identify detours for emergency vehicles, which will then be posted by the contractor. The facility owner or operator will be notified in advance of the timing, location, and duration of construction activities and the locations of detours and lane closures. ➤ Store construction materials only in designated areas. ➤ Coordinate with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. ➤ Transportation and future land use development projects requiring police protection, fire service, and emergency medical service will coordinate with the local fire department and police department to ensure that the existing public services and utilities would be able to handle the increase in demand for their services. If the current levels of service at the individual improvement project or future land use development site are found to be inadequate, infrastructure improvements and personnel requirements for the appropriate public service will be identified in each individual improvement project’s CEQA documentation. ➤ The growth inducing potential of individual transportation and future land use development projects will be carefully evaluated so that the full implications of the 2014 RTP and SCS are understood. Individual environmental documents will quantify indirect impacts (growth that could be facilitated or induced) on public services and utilities. Lead and responsible agencies should then make any necessary adjustments to the applicable general plan. ➤ As part of transportation project-specific or future land use development project-specific environmental review, 			

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>implementing agencies will evaluate the impacts resulting from the potential for severing underground utility lines during construction activities. Appropriate mitigation measures will be identified for all impacts. The implementing agencies will be responsible for ensuring adherence to mitigation measures. MCTC will be provided with documentation indicating compliance with mitigation measures.</p> <ul style="list-style-type: none"> ➤ Prior to construction, the implementing agency or contractor will identify the locations of existing utility lines. All known utility lines will be avoided during construction. 			
<p>3.15.2 Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board</p>	<ul style="list-style-type: none"> ✓ During the CEQA review process for individual facilities, implementing agencies will apply necessary mitigation measures to reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion will be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor
<p>3.15.3 Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects</p>	<ul style="list-style-type: none"> ✓ Projects requiring wastewater service, solid waste collection, or potable water service will coordinate with the local agencies to ensure that the existing public services and utilities would be able to handle the increase. If the current infrastructure servicing the individual transportation improvement or future land use development project sites is found to be inadequate, infrastructure improvements for the appropriate public service utility will be identified in each individual transportation improvement or future land use development project's CEQA documentation. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Reclaimed water will be used for landscaping purposes instead of potable water wherever feasible. ✓ Recently, the Governor declared an emergency drought declaration for the State. Long-term water supply documents anticipate that drought (including severe single-year drought) are regular occurrences within the State. Because the 2014 RTP and SCS do not propose or approve development of any water demand projects, the Governor’s drought declaration does not indicate that there is a significant water supply impact associated with the RTP and SCS. ✓ Each of the proposed transportation improvement projects or future land use developments will comply with applicable regulations related to solid waste disposal. ✓ The construction contractor will work with Recycling Coordinators to ensure that source reduction techniques and recycling measures are incorporated into individual transportation improvement or future land use development project construction. ✓ The amount of solid waste generated during construction will be estimated prior to construction, and appropriate disposal sites will be identified and utilized. 	<p>Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
<p>3.15.4 Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects</p>	<ul style="list-style-type: none"> ✓ During the CEQA review process for individual RTP and SCS projects, implementing agencies with responsibility for the construction of new storm water drainage facilities or the expansion of existing facilities to adequately meet projected capacity needs will apply necessary mitigation measures, including actions set forth in regional watershed management plans, to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion will be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. ✓ As part of transportation project-specific and future land use development project-specific environmental review, implementing agencies will evaluate the impacts resulting from soil accumulation during construction of the transportation projects and future land use developments. Appropriate mitigation measures will be identified for 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>all impacts. The implementing agencies will be responsible for ensuring adherence to the mitigation measures. MCTC will be provided with documentation indicating compliance with mitigation measures.</p> <p>✓ Implementing agencies will implement appropriate measures, such as the washing of construction vehicles undercarriages before leaving the construction site or increasing the use of street cleaning machines, to reduce the amount of soil on local roadways as a result of construction.</p>			
3.15.5 Have sufficient water supplies available to serve the project from existing entitlements and resources, or the need for new or expanded entitlements	<p>✓ Projects requiring potable water service will coordinate with the local agencies to ensure that the existing public services and utilities would be able to handle the increase. If the current infrastructure servicing the individual transportation improvement or future land use development project sites is found to be inadequate, infrastructure improvements for the appropriate public service utility will be identified in each individual transportation improvement or future land use development project’s CEQA documentation.</p> <p>✓ Reclaimed water will be used for landscaping purposes instead of potable water wherever feasible.</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
3.15.6 Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments	<p>✓ Projects requiring wastewater service will coordinate with the local agencies to ensure that the existing public services and utilities would be able to handle the increase. If the current infrastructure servicing the individual transportation improvement or future land use development project sites is found to be inadequate, infrastructure improvements for the appropriate public service utility will be identified in each individual transportation improvement or future land use development project’s CEQA documentation.</p>	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate,</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
<p>3.15.7 Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs</p>	<ul style="list-style-type: none"> ✓ Projects requiring solid waste collection will coordinate with the local agencies to ensure that the existing public services and utilities would be able to handle the increase. If the current infrastructure servicing the individual transportation improvement or future land use development project sites is found to be inadequate, infrastructure improvements for the appropriate public service utility will be identified in each individual transportation improvement or future land use development project's CEQA documentation. ✓ Each of the proposed transportation improvement projects or future land use developments will comply with applicable regulations related to solid waste disposal. ✓ The construction contractor will work with Recycling Coordinators to ensure that source reduction techniques and recycling measures are incorporated into individual transportation improvement or future land use development project construction. ✓ The amount of solid waste generated during construction will be estimated prior to construction, and appropriate disposal sites will be identified and utilized. 	<p>MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p> <p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>
<p>3.15.8 Comply with federal, state, and local statutes and regulations related to solid waste</p>	<ul style="list-style-type: none"> ✓ During the CEQA review process for individual facilities, implementing agencies will apply necessary mitigation measures to reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion will be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. 	<p>✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ Implementing agency or project sponsor</p>

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
		mitigation strategies intended to avoid or reduce the significant impacts identified.		
3.16 SOCIAL & ECONOMIC EFFECTS				
3.16.1 Construction Impacts on Minority and Low-Income Populations	✓ Impact is considered less-than-significant; no mitigation is required.	✓ Not applicable		
3.16.2 Operational Impacts on Low-Income and Minority Populations	✓ Impact is considered less-than-significant; no mitigation is required.	✓ Not applicable		
3.17 TRANSPORTATION/TRAFFIC				
3.17.1 Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system	<p>✓ Local agencies shall update general, area, community and specific plans consistent with State statutes and shall prepare capital improvement programs to reflect the current status of future street and highway improvements. The timing of improvements shall also be reflected. These measures will help MCTC identify appropriate and available funding for planned street and highway improvements along the regional street and road system during development of future RTPs.</p> <p>When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.</p> <p>✓ Measures intended to reduce vehicle miles traveled (VMT) and reduce vehicle hours of delay (VHT) or congestion levels are part of the RTP and SCS. These include: increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use/transportation connection through increased densities, other Travel Demand Management measures described in the RTP and SCS and in local agency General Plans, and key transportation investments targeted to reduce congestion levels and improve LOS.</p> <p>✓ MCTC will continue to score funding programs considering a projects ability to enhance complete streets objectives.</p>	<p>✓ The mitigation measures would require implementing agencies to avoid or mitigate impacts to all types of transportation facilities (multi-modal). MCTC does not have land use authority nor does it have the ability to design and construct transportation improvement projects and future land use developments included in the RTP and SCS. The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies. Therefore the impact is considered significant and unavoidable.</p>	<p>✓ Ongoing over the life of the Plan</p>	<p>✓ MCTC and Implementing agency or project sponsor</p>

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Beyond the currently financially and institutionally feasible measures included in the 2014 RTP and SCS, MCTC will identify further reduction in VMT, and fuel consumption that could be obtained through land-use strategies, additional car-sharing programs, additional vanpools, and additional bicycle programs. ✓ Transportation Planning: MCTC will assist local jurisdictions to encourage new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. ✓ Local jurisdictions can and will promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. ✓ The Plan includes measures intended to reduce vehicle hours of delay. These include: system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce delay. MCTC shall encourage local agencies to fully implement these policies and projects. ✓ The Plan includes measures intended to reduce daily heavy-duty truck vehicle hours of delay. These include: goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. MCTC shall encourage local agencies to fully implement these policies and projects. ✓ Local jurisdictions shall mitigate potential hazards or unsafe conditions during the construction of transportation projects including the review of re-routing requirements, and route scheduling and delays and provide the mitigation measures that shall reduce the impacts to a level of less-than-significant. 			

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Local jurisdictions can and will encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. ✓ Local jurisdictions can and will encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. ✓ Transit agencies can and will encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. ✓ Project sponsors can and will build or fund a major transit stop within or near the development. ✓ Local jurisdictions and transit agencies can and will provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers. ✓ Local jurisdictions and project sponsors can and will incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments. ✓ Local jurisdictions can and will require amenities for non-motorized transportation, such as secure and convenient bicycle parking. ✓ Local jurisdictions can and will ensure that the project enhances, and does not disrupt or create barriers to, non-motorized transportation. ✓ Local jurisdictions can and will connect parks and open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. 			

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Local jurisdictions can and will create bicycle lanes and walking paths directed to the location of schools, parks and other destination points. ✓ Local jurisdictions can and will work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles. ✓ Local jurisdictions and transit agencies can and will provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation related emissions. ✓ Local jurisdictions can and will educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. ✓ Project Selection: Local jurisdictions can and will give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. ✓ System Interconnectivity: Local jurisdictions can and will create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following: <ul style="list-style-type: none"> ➤ Ensure transportation centers are multi-modal to allow transportation modes to intersect; ➤ Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail; ➤ To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges; ➤ Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations; 			

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ➤ Coordinate schedules and routes across service lines with neighboring transit authorities; ➤ Support programs to provide “station cars” for short trips to and from transit nodes (e.g., neighborhood electric vehicles); ➤ Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more; ➤ Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management will be considered where needed to reduce conflicts between transit vehicles and other vehicles; ➤ Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets; ➤ Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible. ✓ Transit System Infrastructure: Local jurisdictions can and will upgrade and maintain transit system infrastructure to enhance public use, including: <ul style="list-style-type: none"> ➤ Ensure transit stops and bus lanes are safe, convenient, clean and efficient; ➤ Ensure transit stops have clearly marked street-level designation, and are accessible; ➤ Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate; ➤ Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile. ✓ Customer Service: Transit agencies can and will enhance customer service and system ease-of-use, including: <ul style="list-style-type: none"> ➤ Develop a Regional Pass system to reduce the number of different passes and tickets required of system users; ➤ Implement “Smart Bus” technology, using GPS and electronic displays at transit stops to provide customers with “real-time” arrival 			

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service);</p> <ul style="list-style-type: none"> ➤ Investigate the feasibility of an on-line trip-planning program. ✓ Transit Funding: Local jurisdictions can and will prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, including: <ul style="list-style-type: none"> ➤ Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic; ➤ Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. ✓ Transit and Multimodal Impact Fees: Local jurisdictions can and will assess transit and multimodal impact fees on new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. ✓ System Monitoring: Local jurisdictions can and will monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. ✓ Arterial Traffic Management: Local jurisdictions can and will modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. ✓ HOV Lanes: Local jurisdictions can and will encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. ✓ Ride-Share Programs: MCTC and local jurisdictions can and will promote ridesharing programs, including: <ul style="list-style-type: none"> ➤ Designate a certain percentage of parking spaces for ride-sharing vehicles; ➤ Designate adequate passenger loading, unloading, and waiting areas for ridesharing vehicles; ➤ Provide a web site or message board for coordinating shared rides; ➤ Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit; 			

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ➤ Hire or designate a rideshare coordinator to develop and implement ridesharing programs. ✓ Employer-based Trip Reduction: Local jurisdictions can and will support voluntary, employer-based trip reduction programs, including: <ul style="list-style-type: none"> ➤ Provide assistance to regional and local ridesharing organizations; ➤ Advocate for legislation to maintain and expand incentives for employer ridesharing programs; ➤ Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes; ➤ Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. ✓ Ride Home Programs: Local jurisdictions can and will implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. ✓ Local Area Shuttles: Transit agencies can and will encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. ✓ Local jurisdictions and transit agencies can and will create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers. ✓ Local jurisdictions can and will work with existing shuttle service providers to coordinate their services. ✓ Low- and No-Travel Employment Opportunities: Local jurisdictions can and will facilitate employment opportunities that minimize the need for private vehicle trips, including: <ul style="list-style-type: none"> ➤ Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations; ➤ Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate. ✓ Local jurisdictions can and will support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. 			

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Development Standards for Bicycles: Local jurisdictions can and will establish standards for new development and redevelopment projects to support bicycle use, including: <ul style="list-style-type: none"> ➤ Amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, by incorporating the following: <ul style="list-style-type: none"> ▪ “Complete Streets” policies that foster equal access by all users in the roadway design; ▪ Bicycle and pedestrian access internally and in connection to other areas through easements; ▪ Safe access to public transportation and other non-motorized uses through construction of dedicated paths; ▪ Safe road crossings at major intersections, especially for school children and seniors; ▪ Adequate, convenient and secure bike parking at public and private facilities and destinations in all urban areas; ▪ Street standards will include provisions for bicycle parking within the public right of way. ✓ Local jurisdictions can and will require new development and redevelopment projects to include bicycle facilities, as appropriate with the new land use, including: <ul style="list-style-type: none"> ➤ Construction of weatherproof bicycle facilities where feasible, and at a minimum, bicycle racks or covered, secure parking near the building entrances; ➤ Provision and maintenance of changing rooms, lockers, and showers at large employers or employment centers. ➤ Prohibit projects that impede bicycle and pedestrian access, such as large parking areas that cannot be safely crossed by non-motorized vehicles, and developments that block through access on existing or potential bicycle and pedestrian routes; ➤ Encourage the development of bicycle stations at intermodal hubs, with attended or “valet” bicycle parking, and other amenities such as bicycle rental and repair, and changing areas with lockers and showers; ➤ Conduct a connectivity analysis of the existing bikeway network to identify gaps, and prioritize bikeway development where gaps exist. 			

TABLE B-1 – Summarization of Impacts, Mitigation Measures, and Significance

Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ✓ Bicycle and Pedestrian Trails: Local jurisdictions can and will establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. ✓ Bicycle Safety Program: Local jurisdictions can and will develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. ✓ Bicycle and Pedestrian Project Funding: Local jurisdictions can and will pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects, including, as appropriate: <ul style="list-style-type: none"> ➤ Apply for regional, State, and federal grants for bicycle and pedestrian infrastructure projects; ➤ Establish development exactions and impact fees to fund bicycle and pedestrian facilities; ➤ Use existing revenues, such as State gas tax subventions, sales tax funds, and general fund monies for projects to enhance bicycle use and walking for transportation. ✓ Bicycle Parking: Local jurisdictions can and will adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments. ✓ Local jurisdictions can and will implement measures to reduce employee vehicle trips and to mitigate emissions impacts from municipal travel. ✓ Pedestrian and Bicycle Promotion: Local jurisdictions can and will work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. ✓ Trip Reduction Program: Local jurisdictions can and will implement a program to reduce vehicle trips by employees, including: <ul style="list-style-type: none"> ➤ Providing incentives and infrastructure for vanpooling and carpooling, such as pool vehicles, preferred parking, and a website or bulletin board to facilitate ridesharing; 			

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<ul style="list-style-type: none"> ➤ Providing subsidized passes for mass transit; ➤ Offering compressed work hours, off-peak work hours, and telecommuting, where appropriate; ➤ Offer a guaranteed ride home for employees who use alternative modes of transportation to commute. ✓ Bicycle Transportation Support: Local jurisdictions can and will promote and support the use of bicycles as transportation, including: <ul style="list-style-type: none"> ➤ Providing bicycle stations with secure, covered parking, changing areas with storage lockers and showers, as well as a central facility where minor repairs can be made; ➤ Providing bicycles, including electric bikes, for employees to use for short trips during business hours; ➤ Implementing a police-on-bicycles program; ➤ Providing a bicycle safety program, and information about safe routes to work. ✓ Transit Access to Municipal Facilities: Local jurisdiction and agency facilities can and will be located on major transit corridors, unless their use is plainly incompatible with other uses located along major transit corridors. 			
<p>3.17.2 Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways</p>	<ul style="list-style-type: none"> ✓ A number of local street and road and State Route segments along the regional street and highway will experience deficient LOS conditions by 2040. Mitigation measures for these segments have not been identified or programmed in the RTP. Intersection improvements and lane additions would improve deficient levels of service to acceptable levels consistent with minimum LOS policies identified in the RTP; however, funding to address the improvements is not available or the costs to mitigate the deficiencies are prohibitive. MCTC will coordinate efforts to identify appropriate strategies that would improve deficient levels of service along the affected streets and highways. MCTC will continue to work with local agencies and Caltrans, District 6 to identify alternative improvements, associated cost estimates, and an implementation plan and schedule as part of various Caltrans studies and during update of local general plans and other planning efforts. Various funding sources will be analyzed as part of implementation plans and findings will be incorporated into future RTPs. ✓ Project sponsors of a commercial use can and will submit to the Lead Agency (or other appropriate government agency) a Transportation 	<ul style="list-style-type: none"> ✓ While improved mobility will result from implementation of the projects contained in the RTP as well as the mitigation measures listed above, some significant unavoidable impacts, considering the regional minimum LOS policy of “D” will occur. LOS deficiencies will result along a number of regional street and highway segments and associated intersections because of the inability to widen such facilities due to funding and other constraints even with RTP projects. It is anticipated that even with implementation of the Project, significant LOS deficiencies will continue therefore; this impact would be considered significant and unavoidable. ✓ Congestion decreases and transit use increases with the Project are considered beneficial impacts. In addition, employment choices are increased for both automobile and transit users. Because one of the stated objectives of the 2014 RTP and SCS is to reduce congestion and improve mobility, this is considered a significant beneficial impact. ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ MCTC and Implementing agency or project sponsor

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	<p>Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The sponsor will implement the approved TDM plan. The TDM will include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use. All four modes of travel will be considered. Strategies to consider include the following:</p> <ul style="list-style-type: none"> ➤ Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement ➤ Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document) ➤ Signage and striping onsite to encourage bike safety ➤ Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials ➤ Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan. ➤ Direct transit sales or subsidized transit passes ➤ Guaranteed ride home program ➤ Pre-tax commuter benefits (checks) ➤ On-site car-sharing program ➤ On-site carpooling program ➤ Distribution of information concerning alternative transportation options ➤ Parking spaces sold/leased separately ➤ Parking management strategies; including attendant/valet parking and shared parking spaces <p>✓ Project sponsors and construction contractors can and will meet with the appropriate Lead Agency (or other government agency) to determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. The project sponsor will develop a construction management plan for review and approval by the Lead Agency (or other government agency as appropriate). The plan will include at least the following items and requirements:</p> <ul style="list-style-type: none"> ➤ A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic 	<p>jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce impacts on the level of service standard established by the county congestion management agency for designated roads or highways, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce impacts identified.</p>		

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Impact(s)	Mitigation Measure (s)	Significance after Mitigation	Timing of Implementation	Responsible Agency or Party
	<p>hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes.</p> <ul style="list-style-type: none"> ➤ Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. ➤ Location of construction staging areas for materials, equipment, and vehicles at an approved location. ➤ A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager will determine the cause of the complaints and will take prompt action to correct the problem. The Lead Agency will be informed who the Manager is prior to the issuance of the first permit. ➤ Provision for accommodation of pedestrian flow. ➤ As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces. ➤ Any damage to the street caused by heavy equipment, or as a result of this construction, will be repaired, at the project sponsor's expense, within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair will occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety will be repaired immediately. The street will be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy. ➤ Any heavy equipment brought to the construction site will be transported by truck, where feasible. ➤ No materials or equipment will be stored on the traveled roadway at any time. ➤ Prior to construction, a portable toilet facility and a debris box will be installed on the site, and properly maintained through project completion. ➤ All equipment will be equipped with mufflers. ➤ Prior to the end of each work-day during construction, the contractor or contractor will pick up and properly dispose of all 			

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	<p>litter resulting from or related to the project whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors.</p> <ul style="list-style-type: none"> ✓ Project sponsors can and will ensure that prior to construction all necessary local and State road and railroad encroachment permits are obtained. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans will include the following requirements: <ul style="list-style-type: none"> ➤ Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. ➤ Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. ➤ Scheduling of truck trips outside of peak morning and evening commute hours. ➤ Limiting of lane closures during peak hours to the extent possible. ➤ Usage of haul routes minimizing truck traffic on local roadways to the extent possible. ➤ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. ➤ Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. ➤ Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions will be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. ➤ Storage of construction materials only in designated areas 			

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	<ul style="list-style-type: none"> ➤ Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. ✓ Local jurisdictions can and will implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. ✓ Signal Synchronization: Local jurisdictions can and will expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. ✓ Delivery Schedules: Local jurisdictions can and will establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas. 			
3.17.3 Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks	<ul style="list-style-type: none"> ✓ Not applicable. 	<ul style="list-style-type: none"> ✓ Not applicable. 		
3.17.4 Substantially increase hazards due to a design feature or incompatible uses	<ul style="list-style-type: none"> ✓ Implementing agencies will consider safety an objective in the design of RTP and SCS projects, and will plan to avoid, improve, or mitigate safety impacts in the course of project-level environmental review. ✓ MCTC shall conduct a forum where policy-makers can be educated and can develop consensus on regional transportation safety and security policies. ✓ MCTC shall work with local officials to assist with implementation of regional transportation safety and security policies. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan ✓ FY 2015/16 ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor ✓ MCTC ✓ MCTC and Implementing agency or project sponsor
3.17.5 Result in inadequate emergency access	<ul style="list-style-type: none"> ✓ MCTC shall support local agencies with the rapid repair of transportation infrastructure in the event of an emergency. This will be 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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	<p>accomplished by MCTC, in cooperation with local and State agencies, identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. In addition, MCTC shall establish transportation infrastructure practices that promote and enhance security.</p>	<p>jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		
<p>3.17.6 Result in inadequate parking capacity</p>	<ul style="list-style-type: none"> ✓ Local jurisdictions can and will establish parking policies and requirements that capture the true cost of private vehicle use and support alternative modes of transportation. ✓ Parking Policy: Local jurisdictions can and will adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: <ul style="list-style-type: none"> ➤ Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; ➤ Eliminate or reduce minimum parking requirements for new buildings; ➤ “Unbundle” parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); ➤ Use parking pricing to discourage private vehicle use, especially at peak times; ➤ Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; ➤ Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; ➤ Encourage shared parking programs in mixed-use and transit-oriented development areas. 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified. 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ Implementing agency or project sponsor

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	<ul style="list-style-type: none"> ✓ Event Parking Policies: Local jurisdictions can and will establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: <ul style="list-style-type: none"> ➤ Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking; ➤ Encourage special event center operators to advertise and offer discounted transit passes with event tickets; ➤ Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking; ➤ Promote the use of bicycles by providing space for the operation of valet bicycle parking service. ✓ Parking “Cash-out” Program: Local jurisdictions can and will require new office developments with more than 50 employees to offer a Parking “Cash-out” Program to discourage private vehicle use. ✓ Electric/Alternative Fuel Vehicle Parking: Local jurisdictions can and will require new commercial and retail developments to provide prioritized parking for electric vehicles and vehicles using alternative fuels. ✓ Municipal Parking Management: Local jurisdictions can and will implement a Parking Management Program to discourage private vehicle use, including: <ul style="list-style-type: none"> ➤ Encouraging carpools and vanpools with preferential parking and a reduced parking fee; ➤ Institute a parking cash-out program; ➤ Renegotiate employee contracts, where possible, to eliminate parking subsidies; ➤ Install on-street parking meters with fee structures designed to discourage private vehicle use; establish a parking fee for all single-occupant vehicles. ✓ Local jurisdictions can and will adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation. 			
3.17.7 Conflict with adopted policies, plans, or programs supporting alternative transportation	<ul style="list-style-type: none"> ✓ Local agencies will be encouraged to update general, area, community and specific plans to reflect the current status of future 2014 RTP and 	<ul style="list-style-type: none"> ✓ The responsibility to approve land use development consistent with the general plans and the SCS rests with the local jurisdictions and the responsibility to design and construct transportation improvements rests with Caltrans, the local 	<ul style="list-style-type: none"> ✓ Ongoing over the life of the Plan 	<ul style="list-style-type: none"> ✓ MCTC and Implementing agency or project sponsor

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(e.g., bus turnouts, bicycle racks)	<p>SCS street and highway improvements and future land use allocations reflected in the SCS.</p> <p>When such updates do occur, MCTC staff will provide an evaluation of compliance with the RTP and SCS land use allocations, as well as an evaluation of whether those plans comply with the mitigation measures contained in the RTP and SCS PEIR. Where noncompliance is found, MCTC staff will make suggestions for how compliance could be attained.</p>	<p>jurisdictions, and other responsible agencies with jurisdiction over a project area. While implementation and monitoring of the above mitigation measures will provide the framework and direction to avoid or reduce the identified significant impacts identified, it is probable that such impacts could remain significant and unavoidable. As a program-level document, evaluation of all project-specific circumstances is not plausible. Individual projects will require a project-level analysis to determine appropriate mitigation strategies. As appropriate, MCTC will encourage the implementation of the above-notated mitigation strategies intended to avoid or reduce the significant impacts identified.</p>		