

BEFORE THE
COUNCIL OF FRESNO COUNTY GOVERNMENTS
RESOLUTION NO. 2010-09

In the Matter of:)
)
CERTIFYING THE FINAL)
SUBSEQUENT ENVIRON-)
MENTAL IMPACT REPORT)
(SEIR))

**RESOLUTION CERTIFYING THE
FINAL SEIR FOR THE 2011 RTP**

WHEREAS, the Council of Fresno County Governments is a Regional Transportation Planning Agency and a Metropolitan Planning Organization, pursuant to State and Federal designation; and

WHEREAS, federal planning regulations require Metropolitan Planning Organizations to prepare and adopt a long range Regional Transportation Plan (RTP) for their region; and

WHEREAS, the Council of Fresno County Governments (Fresno COG) has prepared a Subsequent Environmental Impact Report (SEIR) for the 2011 Regional Transportation Plan relating to and assessing environmental effects related to the development of the 2011 Regional Transportation Plan; and

WHEREAS, in accordance with the provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines, a Notice of Completion of the Draft SEIR was filed and the Draft SEIR was routed to the State Clearinghouse, responsible agencies, other governmental and trustee agencies having discretionary approval or jurisdiction by law over natural resources affected by the Project, the County of Fresno, affected transportation agencies, and other interested persons and agencies; and

WHEREAS, all comments on the SEIR concerning environmental issues that were received during the public review period were evaluated by Fresno COG Staff and a written response was prepared in accordance with the requirements of CEQA Guideline, section 15088. Both the comments and responses thereto are included in the final SEIR; and

WHEREAS, the final SEIR contains the elements required by CEQA, including, but not limited to:

- (a) Identification, description and discussion of all potential significant environmental effects of the proposed project, both direct and indirect, both short term and long term.
- (b) A description of mitigation measures proposed to minimize potentially significant environmental effects of the proposed project identified in the final SEIR.
- (c) A description of those potentially significant environmental effects which can not be avoided or which can be mitigated, but not reduced to a level of insignificance.
- (d) A description of a range of reasonable alternatives to the proposed project and evaluation of the comparative merits and potentially significant environmental effects of the alternatives, including the "no project" alternative.
- (e) A discussion of cumulative impacts, in accordance with the requirements of CEQA Guidelines section 15130.
- (f) A list of all Federal, State and local agencies or other organizations and private individuals consulted in preparing the SEIR, and the firm preparing the SEIR; and

WHEREAS, the mitigation measures contained in the final EIR have been incorporated into the Mitigation Monitoring and Reporting Plan designed to insure the implementation of measures imposed to alleviate or lessen significant environmental impacts; and

WHEREAS, the responses to comments were supplied to public agencies that had submitted comments on the draft SEIR; and

WHEREAS, the Fresno COG has heard, been presented with and is familiar with the information in the administrative record, has reviewed and considered the information in the SEIR for completeness and compliance with CEQA; and

WHEREAS, the Fresno COG held a public hearing on May 27, 2010 to consider the 2011 RTP Program SEIR and the 2011 RTP; and

WHEREAS, no comments were made from members of the public on the SEIR.

NOW, THEREFORE BE IT RESOLVED by the Fresno COG, based on the foregoing facts and circumstances as follows:

1. The Fresno COG finds that the Findings and Statement of Overriding Consideration attached hereto as Exhibit 1 and incorporated herein by reference, accurately summarized the project addressed in the SEIR, its impacts and benefits to the community.

2. The Fresno COG finds that the Mitigation Monitoring and Reporting Plan attached hereto as Exhibit 2 and incorporated herein by reference is an adequate Mitigation Monitoring Program pursuant to Public Resources Code section 21081.6. The Fresno COG hereby adopts the Mitigation Monitoring and Reporting Program set forth in Exhibit 2 with respect to those mitigation measures imposed on the project pursuant to the conditions.

3. The final SEIR reflects the independent judgment of the Fresno COG Policy Board, has been completed and processed in compliance with the requirements of CEQA.
4. The final SEIR has been completed and processed in compliance with CEQA.
5. The 2011 Regional Transportation Plan Program Final SEIR is thus certified.

THE FOREGOING RESOLUTION was passed and adopted by the Council of Fresno County Governments this 29th day of July 2010.

AYES:

NOES:

ABSTAIN:

ABSENT:

ATTEST:

Signed: _____
Trinidad M. Rodriguez, Chairman

I hereby certify that the foregoing is a true copy of a resolution of the Council of Fresno County Governments duly adopted at a regular meeting thereof held on the 29th day of July, 2010.

Signed: _____
Tony Boren, Executive Director

2.0 WRITTEN COMMENTS AND FINAL RESPONSES TO COMMENTS (Comments received are provided beginning on Page 2-8)

FROM: Erin M. Hanlon, Regulatory Project Manager, Sacramento District, Department of the Army, U.S. Army Engineer District, Sacramento, Corps of Engineers

DATED: May 5, 2010

RESPONSE #1:

Appropriate mitigation measures are provided in the Draft SEIR (reference Page 3-60). Such measures address the Corps' comment. Changes to the Draft SEIR are not necessary.

RESPONSE #2:

Appropriate mitigation measures are provided in the Draft SEIR (reference Pages 3-60 through 3-62). Such measures address the Corps' comment. Changes to the SEIR are not necessary.

FROM: Bill Pfanner, Supervisor, Local Energy & Land Use Assistance Unit, Special Projects Office, Fuels and Transportation Division, California Energy Commission

DATED: May 13, 2010

RESPONSE #3

A separate Energy Conservation Section has been prepared to address the comment and is included in Chapter 3 of the Final SEIR (Changes to the Draft SEIR). Mitigation measures that address energy conservation were also included in Chapter 3, Section 3.6 of the Draft SEIR under Climate Change.

RESPONSE #4

Comment noted. A new mitigation measure has been added to Chapter 3 of the Final SEIR (Changes to the Draft SEIR) referencing the Energy Commission's *Energy Aware Planning Guide*.

FROM: Tom Krazan, Sanger Hill Ranch

DATE: June 15, 2010

RESPONSE #5:

The Draft SEIR considered the impacts of projects and programs referenced in the Draft RTP. The Draft RTP includes a number of programs and projects (reference Chapter 2, Table 2-1 and Figures 2-2 and 2-3 in the Draft SEIR) that will provide for improved multimodal transportation services and facilities between the rural areas of Fresno County and the FCMA. Such projects include the following major highway improvements:

- ◆ SR 180 West between James and Yuba – Passing Lanes
- ◆ SR 80 West between I-5 and the SR 33/SR180 Junction – new 4-lane highway
- ◆ SR 180 East between Temperance and Frankwood - a 4-Lane expressway on a new right-of-way
- ◆ SR 99 – various mainline and interchange improvements connecting the rural communities of Kingsburg, Selma and Fowler with the FCMA
- ◆ A number of other major arterial facility improvements (additional lanes or new connections)

In addition, the RTP references a number of public transit improvements throughout the County that will increase service frequency, expand service areas, and provide additional services and facilities to enhance public transit access and connections to other travel modes and the FCMA for jobs and services. Referencing Chapter 2, Pages 3-52 through 3-57 and Figure 2-10 of the Draft SEIR, the existing and future rural transit system is detailed, reflecting the various services provided through the Fresno County Rural Transit Agency (FCRTA) and social service transit services provided by FCRTA and the Fresno County Economic Opportunities Commission (FCEOC).

Finally, the Measure “C” Extension program provided for a significant increase in transit and rural highway funding. Approximately 24% or \$412 million of all Measure “C” funding must be allocated to public transit improvements within the County, including the rural systems. Approximately 34.6 percent or approximately \$594 million of Measure “C” funding is allocated to the Local Transportation Program, which local agencies throughout the County use to finance maintenance and rehabilitation programs, comply with Americans with Disabilities Act (ADA) requirements, provide funding for any transportation-related project, and allocate funding for bicycle, trails and pedestrian facilities. The funding is allocated on an annual basis considering population and road miles. A number of other federal and state funding programs are also assumed that will benefit the rural areas of the County through the year 2035. Further, the annual “Unmet Transit Needs” process provides the opportunity for citizens and stakeholders within the County to identify their requests for new, enhanced, or expanded transit services, the need to access new job development opportunities within the County, or other unforeseen occurrences that may require the addition of transit services.

RESPONSE #6:

Other transportation services, including public transportation services and systems are reflected in the Draft SEIR. Reference response to Comment 5 above.

RESPONSE #7:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

FROM: Chris Ganson, Transportation Planning Lead, Environmental Review Office, United States Environmental Protection Agency, Region IX

DATE: June 14, 2010

RESPONSE #8:

The Draft RTP highlights a number of efficiency measures intended to reduce air emissions and improve the region’s air quality. Referencing Chapter 4, Section 4.4, Page 4-33 of the RTP, there are a number of public transit improvements included in the RTP intended to enhance service for

commuters and enhanced access to services. In addition, there is significant emphasis on the expansion of bikeways, trails, and pedestrian facilities throughout the County. Further, referencing Chapter 4, Section 4.9 of the RTP, beginning on Page 4-104, a number of transportation control measures (TCMs), transportation demand management (TDM) strategies, transportation systems management (TSM) strategies, and other programs and strategies are recommended to reduce single occupant vehicle (SOV) trips and vehicle miles traveled (VMT). In addition, land use measures are highlighted reflecting the Valleywide effort accomplished over the past three years to develop a coordinated Valley vision – the San Joaquin Valley Regional Blueprint. The Valley council of governments (COGs), including Fresno COG, are now in the process of preparing an implementation plan and toolkit to be used by local agencies to guide development and promote the livable and sustainable communities resulting in areas with improved air quality, supportive multimodal transportation systems, and sustainable environmental resources. Finally, a number of strategies are included in the Conformity Analysis document and in the Climate Change Element of the RTP (reference Chapter 5 of the RTP (Page 5-1) and the Draft SEIR (Chapter 3, Section 3.5 – Page 3-66) that will result in reduced air emissions and improved multimodal transportation systems. It should be noted that the Conformity analysis shows that Project emissions do not exceed the base and budget thresholds established by EPA. Emissions (with the exception of PM₁₀, which is in attainment of federal standards) will be reduced between 2010 and 2035 as RTP improvements are constructed.

RESPONSE #9:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #10:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #11:

The Draft SEIR, Chapter 3, Section 3.5 Climate Change and Chapter 5 of the RTP, provides a detailed discussion of GHG impacts and recommended mitigation measures. Referencing Page 3-78 of the Draft SEIR, an analysis of the project (all projects listed in the 2011 RTP) versus the No Build Alternative has been quantified. Emissions were estimated using the Fresno COG Traffic Model and EMFAC. EMFAC considers vehicle hours traveled, vehicle trips, vehicle miles traveled, and other factors when it computes emissions estimates for all modeled improvement projects listed in the RTP. The traffic model includes estimates of transit, pedestrian, bicycle and other trips during the modeling process. If project improvements are not implemented over time, GHG emissions will increase because congestion and vehicle hours of travel will significantly increase. Reference Table 2-1 in Chapter 2 of the Final SEIR.

It should be noted that the Draft SEIR contains a number of mitigation measures that require local agencies to quantify and mitigate GHG impacts resulting from individual transportation improvement projects listed in the RTP. It is not possible for the RTP to estimate project specific impacts other than from a cumulative perspective.

RESPONSE #12:

Fresno COG concurs with the importance of a coordinated/cooperative partnership with the local air district and both the Fresno COG and the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) collaborate on air quality issues. The locally adopted Air District Climate Change Action Plan was discussed in Chapter 5, Page 9 of the Draft 2011 RTP. This guidance will be of use in the implementation phase of the Fresno as well as the San Joaquin Valley Blueprint process. The following paragraph has been added to that section:

The first comprehensive regional policy and guidance on addressing and mitigating greenhouse gas (GHG) emission impacts caused by industrial, commercial, and residential development in the San Joaquin Valley was adopted by the Valley Air District's Governing Board December 17, 2009. This set of guidance documents is designed to assist local permitting agencies and businesses by answering several questions related to the California Environmental Quality Act (CEQA) and how to address GHG impacts under existing CEQA law. For more information please see http://www.valleyair.org/Programs/CCAP/CCAP_idx.htm.

Chapter 3, Section 3.5 of the Draft SEIR includes a discussion of the Air District's Climate Change Action Plan; therefore changes to the Draft SEIR are not necessary.

RESPONSE #13:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #14:

The California Environmental Quality Act (CEQA) requires that Fresno COG address impacts that the project (2011 RTP) may have on an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Planning (NCCP) Program, or other approved local, state or regional HCP. The mitigation measure is intended to reduce such impacts should a HCP be approved within the County. Currently, there are no HCP, HCCP or other similar programs or plans adopted within the County or by any of the local agencies. A statement to that effect has been included in Chapter 3 of the Final SEIR (Changes to the Draft SEIR).

Recommended biological and sensitive habitat mitigation measures listed in the comment letter have been added to Chapter 3 of the Final SEIR (Changes to the Draft SEIR).

RESPONSE #15:

The Draft SEIR contains information regarding the use of available data used to inform regional transportation planning decisions. The Draft SEIR provides a detailed description of data sources and information available to identify potential natural or historic resource impacts, as well as appropriate mitigation measures to address impacts associated with the short- and long-range improvement projects to be implemented by various state, local, and other agencies. The Draft SEIR is incorporated in the 2011 RTP by reference. In addition, the specific references to each data source listed in the comment letter, which were not included in the Draft SEIR, have been

included in Chapter 3 of the Final SEIR (Changes to the Draft SEIR) including U.S. Fish & Wildlife Service's species recovery plans, the USDA Natural Resources Conservation Service wetland data, the Nature Conservancy data and regional planning document, and local non-profit and land trust group information.

FROM: Cathy Rodriguez, Transportation Planning North Branch, Department of Transportation, District 06

DATE: June 14, 2010

RESPONSE #16:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #17:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #18:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #19:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #20:

Fresno COG concurs that the LOS methodology, which will be applied to assess the level of service associated with individual improvement projects during a focused environmental review, should apply Highway Capacity Manual methods to determine segment and intersection levels of service.

While the project (2011 RTP) relied on mass transit and alternative transportation modes to reduce trips and improve level of service along the street and highway system, the RTP and Draft SEIR identified other strategies as well. Specifically, the Draft SEIR references measures such as "increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, and maximizing the benefits of the land use/transportation connection, other Travel Demand Management measures described in the RTP and in local agency General Plans, and key transportation investments targeted to reduce congestion levels and improve LOS." Finally, land use measures are highlighted reflecting the Valleywide effort accomplished over the past three years to prepare develop a coordinated valley vision – the San Joaquin Valley Regional Blueprint. The Valley council of governments (COGs), including Fresno COG, are now in the process of preparing an implementation plan and toolkit to be used by local agencies to guide development and promote the livable and sustainable communities resulting in areas with improved air quality, supportive multimodal transportation systems, and sustainable environmental resources. Finally, a number of strategies

are included in the Conformity Analysis and in the Climate Change section of the RTP (Chapter 5, Page 5-1) and the Draft SEIR (Chapter 3, Section 3.5 – Page 3-66) that will result in reduced air emissions and improved multimodal transportation systems.

RESPONSE #21:

The analysis of street and highway level of service provided in the Draft SEIR is intended to identify critically congested segments along the regionally significant street and highway system and is reflective of minimum standards that have been adopted by Caltrans, the County of Fresno, and each of the cities. Most of these agencies reflect a Minimum Level of Service Standard of “D”; while a few identify “C” as the minimum standard. Caltrans’ minimum level of service standard is “C” in all rural areas and “D” in urban areas. None of the agencies specify specific levels of service for rural areas by terrain type and there are no specific standards for suburban areas. Fresno COG has always identified LOS “D” as the minimum LOS standard for the regionally significant street and highway system including during preparation of previous RTP and associated EIR documents, corridor studies, development of the Measure “C” Extension funding program of projects, development of the Regional Mitigation Impact Fee (RTMF) program, and other similar regional studies. Further, Fresno COG has identified a minimum LOS of “C” in the rural areas of the County and LOS “D” in the urban areas as part of its Congestion Management Program (CMP).

It should be noted that Fresno COG will be developing a new set of project evaluation criteria and associated methodologies to evaluate and prioritize regionally significant transportation projects to be incorporated into the 2014 RTP. Fresno COG will consider revising its minimum level of service standard and welcomes consideration of this and future suggested level of service standards considering other studies and plans, facility type, geographic location, terrain type, and other technical and environmental factors during that process.

RESPONSE #22:

Unconstrained street and highway projects are included in the Draft RTP in Appendix D-1 beginning on Page D-1.

RESPONSE #23:

Adopted fee program funding collected by local agencies or through the Regional Transportation Mitigation Fee (RTMF) program is already considered in the constrained Financial Element of the 2011 Draft RTP. Such funding was identified to address RTP improvement projects listed in the street and highway constrained capacity increasing project list along the state highway system or on the local street and highway systems. Other available funding sources (such as Measure “C”) that can be relatively assured during the planning period of the RTP or through the Year 2035, have also already been assumed to address costs associated with constrained capacity increasing street and highway projects.

The statement referenced in Comment 23 regarding funding requirements is meant to indicate that additional coordination with affected agencies will be required to address the list of unfunded or unconstrained street and highway projects over time.

Fresno COG has included the list of improvement projects provided by Caltrans and other local agencies on the unconstrained project list when funding for such projects has not been identified or assumed to be available over the life of the RTP (reference Chapter 6, Section 6.6, Page 6-17 of the Draft RTP).

RESPONSE #24:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #25:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #26:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

RESPONSE #27:

This comment is not related to the RTP SEIR. Reference RTP Response to Comments.

**Fresno COG 2011 Regional Transportation Plan
FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT**



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

May 5, 2010

Regulatory Division SPK-2010-00571

Clark Thompson
The Council of Fresno County Governments
2035 Tulare Street, Suite 201
Fresno, California 93721

Dear Mr. Thompson:

We are responding to your May 3, 2010 request for comments on the Fresno COG 2011 Regional Transportation Plan Subsequent Environmental Impact Report. The report area covered includes Section 35, Township 13 South, Range 21 East, MDB &M Survey, Latitude 36.75874°, Longitude -119.65444°, Fresno County, California. Your identification number is SPK-2010-00571.

The Corps of Engineers' jurisdiction within the study area is under the authority of Section 404 of the Clean Water Act for the discharge of dredged or fill material into waters of the United States. Waters of the United States include, but are not limited to, rivers, perennial or intermittent streams, lakes, ponds, wetlands, vernal pools, marshes, wet meadows, and seeps. Project features that result in the discharge of dredged or fill material into waters of the United States will require Department of the Army authorization prior to starting work.

To ascertain the extent of waters on project sites, project applicants should prepare a wetland delineation, in accordance with the "Minimum Standards for Acceptance of Preliminary Wetland Delineations", under "Jurisdiction" on our website at the address below, and submit it to this office for verification. A list of consultants that prepare wetland delineations and permit application documents is also available on our website at the same location.

1

The range of alternatives considered for this project should include alternatives that avoid impacts to wetlands or other waters of the United States. Every effort should be made to avoid project features which require the discharge of dredged or fill material into waters of the United States. In the event it can be clearly demonstrated there are no practicable alternatives to filling waters of the United States, mitigation plans should be developed to compensate for the unavoidable losses resulting from project implementation.

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BY: _____
FRESNO COG

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Please refer to identification number SPK-2010-00571 in any correspondence concerning this project. If you have any questions, please contact me at U.S. Army Corps of Engineers, Regulatory Division, 1325 J Street, Rm. 1480, Sacramento, CA 95814, email *Erin.M.Hanlon@usace.army.mil*, or telephone 916-557-5250. For more information regarding our program, please visit our website at *www.spk.usace.army.mil/regulatory.html*.

Sincerely,



Erin M. Hanlon
Regulatory Project Manager
Sacramento District

Fresno COG 2011 Regional Transportation Plan
FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



May 13, 2010

Clark Thompson
Council of Fresno County Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

Dear Mr. Thompson:

The California Energy Commission has received the Council of Fresno County Governments' Supplemental/Subsequent EIR titled Notice of Preparation of a Subsequent EIR for the Fresno COG 2011 Regional Transportation Plan, SCH 2006121100 that was submitted on 4/30/2010 for comments due by 6/14/2010. After careful review, the Energy Commission has found the following:

We would like to assist in reducing the energy usage involved in your project. Please refer to the enclosed Appendix F of the California Environmental Quality Act for how to achieve energy conservation.

3

In addition, the Energy Commission's *Energy Aware Planning Guide* is also available as a tool to assist in your land use planning. For further information on how to utilize this guide, please visit www.energy.ca.gov/energy_aware_guide/index.html.

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Thank you for providing us the opportunity to review/comment on your project. We hope that our comments will be helpful in your environmental review process.

If you have any further questions, please call Gigi Tien at (916) 651-0566.

Sincerely,

BILL PFANNER
Supervisor, Local Energy & Land Use Assistance Unit
Special Projects Office
Fuels and Transportation Division
California Energy Commission
1516 Ninth Street, MS 23
Sacramento, CA 95814

Enclosure

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BY: _____
FRESNO COG

CEQA: California Environmental Quality Act

Appendix F

ENERGY CONSERVATION

I. Introduction

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

- (1) decreasing overall per capita energy consumption,
- (2) decreasing reliance on natural gas and oil, and
- (3) increasing reliance on renewable energy sources.

In order to assure that energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.

Energy conservation implies that a project's cost effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, lifetime costs may be determined more by energy efficiency than by initial dollar costs.

II. EIR Contents

Potentially significant energy implications of a project should be considered in an EIR. The following list of energy impact possibilities and potential conservation measures is designed to assist in the preparation of an EIR. In many instances, specific items may not apply or additional items may be needed.

A. Project Description may include the following items:

1. Energy consuming equipment and processes which will be used during construction, operation, and/or removal of the project. If appropriate, this discussion should consider the energy intensiveness of materials and equipment required for the project.
2. Total energy requirements of the project by fuel type and end use.
3. Energy conservation equipment and design features.
4. Initial and life-cycle energy costs or supplies.
5. Total estimated daily trips to be generated by the project and the additional energy consumed per trip by mode.

B. Environmental Setting may include existing energy supplies and energy use patterns in the region and locality.

C. Environmental Impacts may include:

1. The project's energy requirements and its energy use efficiency by amount and fuel type for each stage of the project's life cycle including construction, opera-

tion, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

D. Mitigation Measures may include:

1. Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
2. The potential of siting, orientation, and design to minimize energy consumption, including transportation energy.
3. The potential for reducing peak energy demand.
4. Alternate fuels (particularly renewable ones) or energy systems.
5. Energy conservation which could result from recycling efforts.

E. Alternatives should be compared in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy.

F. Unavoidable Adverse Effects may include wasteful, inefficient and unnecessary consumption of energy during the project construction, operation, maintenance and/or removal that cannot be feasibly mitigated.

G. Irreversible Commitment of Resources may include a discussion of how the project preempts future energy development or future energy conservation.

H. Short-Term Gains versus Long-Term Impacts can be compared by calculating the energy costs over the lifetime of the project.

I. Growth-Inducing Effects may include the estimated energy consumption of growth induced by the project.

Clark Thompson

From: Brenda Lauchner
Sent: Tuesday, June 15, 2010 8:16 AM
To: Barbara Steck; Tony Boren; Clark Thompson
Subject: FW: Additional Comments about the Fresno COG 2011 RTP

From: tomkrazan@gmail.com [mailto:tomkrazan@gmail.com] **On Behalf Of** Tom Krazan
Sent: Monday, June 14, 2010 7:20 PM
To: Brenda Lauchner
Cc: Case, Judy; Kathy Millison; John White; Jose Leon-Barraza; Mayor@fresno.gov; juan.arambula@asm.ca.gov; Dick Sheppard; Al Solis; Al Smith; Jeanette "Nettie" Inouye; Angie Rios; Beth Garcia; Dan L Spears; Gary Hanson; Taryn Harmon; Hal Klissler; Dan Hightower; Ishli, Jeanette; j.oilvares; Buzz Burleson; <Kurt Madden; Donna Krazan; <Larry Powell; Richard Olsson; I. Zion Enos; Enrique Zuniga; <Victoria Sallsch; Klose, Valerie; Roger Van Groningen; Deborah Nankivell; <Sarah Najera; Melanie Sue; Emma Jeanne Weber; Andrew Rogerson; Robert Calzadilla; RONALD YAMABE; Yulia Chavez; Sanger Medical Supplies; Brenda Pritchard
Subject: Additional Comments about the Fresno COG 2011 RTP

Hi Brenda,

The document is very thick. I wish we had more time to comment on the Draft EIR report. Here are a few of additional comments.

The Draft EIR far under-estimates the needs of poor people in the outlying communities and their individual transportation needs. Most workers in the rural area depend on Fresno as their place of employment. Mass transit is nice but does not meet the needs of flexible work hours for most Hispanics in rural America. Computers are nice for those in Clovis for virtual offices but that is not reality for the remainder of us in rural Fresno County.

Please read the following.

1) The Draft EIR significantly understates the East-West Corridor issues for the Metro area. Kerman and Sanger by a very recent study are the two fastest growing areas of Fresno County. The study was reported in the Fresno Biz Journal a couple of weeks ago. Kerman was number one and Sanger was number two by a zip code study.

5

Kernan, Sanger, Clovis, Madera, Madera Ranchos, Kingsburg, Selma, and Fowler are all bedroom communities for the Metro Fresno/Clovis area. This is very obvious by the morning and evening drive patterns.

In particular the importance of Kerman and Sanger are far under-estimated in the EIR. Highway 180 is extremely busy but very little is said about these two communities in the EIR and the transportation needs of these two areas. Highway 180 is extremely important to JOBS for the local people of Kerman and Sanger.

2) The importance of the Orange Belt for Rural transportation is far too over-stated. The Orange Belt for Sanger, Parlier, Reedley, and Orange Cove is next to useless. I have tried to ride it from Sanger to Orange Cove. The travel times are extremely poor and we decided to not take the bus. Too

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6/15/2010

inconvenient for general travel or TRAVELING TO WORK.

3) The function of electric cars for short travel is also too under-estimated. I have been an investor in electric cars for the last 10 years or so. My first investment was in a car called the Corbin. My first car is now on display at CART (High School) in Clovis. I have recently purchased two electric vehicles. I now use an electric truck on my ranch in Sanger. I drive it into town often. It can travel most of the day on one charge.

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If I had a way to drive to Fresno from Sanger, I would drive my electric truck into Fresno to sell fresh organic oranges and pecans from my ranch. My electric truck is slow but it is DOT certified at lower speeds. The truck is all steel and has air conditioning (and heater). Over 600 of these trucks are in service in California at this time.

Thank you,

Tom Krazan
Sanger Hill Ranch
Sanger, California
994-0653

6/15/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Clark Thompson, Planner III
Council of Fresno County Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

Subject: U.S. EPA Comments on the Council of Fresno County Governments 2011 Draft
Fresno County Regional Transportation Plan and Draft Environmental Impact
Report

Dear Mr. Thompson:

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to provide feedback on the Council of Fresno County Governments (COFCG) 2011 Draft Fresno County Regional Transportation Plan (RTP) and Draft Environmental Impact Report (DEIR). EPA is committed to the goal of incorporating environmental considerations early in the transportation planning process. This early coordination results in greater opportunities to avoid sensitive resources and minimize impacts associated with future transportation projects.

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) directs metropolitan planning organizations (MPOs) to consult with resource agencies while developing long-range transportation plans. It also requires such plans to discuss potential environmental mitigation activities and potential locations for these activities to restore and maintain environmental functions that could be affected by the plan. EPA provides the following comments in support of compliance with these requirements.

Delineate Robust Measures to Improve Air Quality through Travel Efficiency

Air quality in the San Joaquin Valley is among the poorest in the country, causing significant health environmental impacts to its residents. The valley's geography and meteorology traps pollutants, so special attention must be given to reducing the amount emitted. Transportation within the valley contributes a significant portion of these pollutants, and so reducing emissions from transportation is necessary to improving the valley's air quality. While improvements in vehicle technology are helping, substantial focus on and investment in travel efficiency measures will need to contribute to emissions reduction as well.

Page 1 of 6

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Use the RTP Process to Spur Transportation Efficient Growth That Accomplishes Multiple Objectives

A regional transportation planning process provides an opportunity to focus growth and activity where it most benefits the region. Compact development built in infill locations shortens trip distances; transit oriented development leads to a greater share of transit use; mixing of uses does both and also creates opportunities for active transportation modes. Such development patterns, and the transportation patterns they help create, in turn create environmental and livability benefits.

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EPA, the US Department of Housing and Urban Development (HUD) and the US Department of Transportation (DOT) recently joined in a partnership to support measures to improve livability and sustainability. We encourage COFCG to consider the principles identified through this partnership when working to integrate the blueprint concept into regional planning. More information on this partnership, including grant opportunities, can be found at <http://www.epa.gov/smartgrowth/partnership/>. Programs offered by the partnership, including funding opportunities, can be found at http://www.epa.gov/smartgrowth/pdf/2010_0506_leveraging_partnership.pdf.

Clarify in the RTP How the Ongoing Regional Blueprint Effort Influenced Any Current Design and Route Network Location Decisions.

EPA commends COFCG for its current efforts in blueprint/scenario planning, including both technical and consensus building components of this work. Again, we recognize the importance of this process in preparing for its next RTP cycle, which will require the preparation of a Sustainable Communities Strategy (SCS) under SB 375. In its SCS, EPA recommends that COFCG also include discussions of the other goals and criteria of the regional blueprint and how each relates to and/or influences the RTP. EPA also encourages COFCG to continue to provide support and resources to local jurisdictions to make their general plans and proposed projects consistent with the RTP and the San Joaquin Valley Blueprint (<http://www.valleyblueprint.org/>). Further, EPA suggests identifying how the RTP can facilitate and encourage implementation of measures from the local sustainability plans, such as the Fresno Green plan. We recommend describing how the RTP creates a framework for the creation of more local sustainability plans and support their implementation.

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EPA recognizes that COFCG intends to apply the ongoing regional blueprint process to identify a preferred growth scenario for the future which will serve as the foundation for determining a Sustainable Community Strategy. However, the RTP should clearly state how the information from the ongoing regional blueprint process or from the information collected to complete it in the future has informed the decision-making behind the projects *already proposed* in the RTP. EPA recommends that, at a regional level, the RTP identify how proposed transportation projects have been planned to (1) maximize use of existing infrastructure, such as improvements to existing roadways and transit service, rather than add new infrastructure; (2) satisfy the region's residents need for efficient access to goods and services in the way that

causes the least environmental and social harm; and (3) avoid and minimize harm to high quality resources and habitat. The RTP should also identify what design and route network location decisions were proposed in order to avoid and/or minimize impacts to resources. It should be clear how information about resources, including information from existing resource documents, has informed decisions about the route network.

Provide a More Comprehensive Discussion of the RTP's Implications for Greenhouse Gas Emissions.

Upcoming greenhouse gas emissions targets under SB 375 will require Metropolitan Planning Organizations to develop Sustainable Community Strategies which reduce transportation greenhouse gas emissions. EPA recommends further discussion of these upcoming requirements and the steps it is taking towards meeting them.

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Additionally, we suggest incorporating discussion of the GHG implications of currently proposed projects. Perhaps the most significant influence an MPO has on greenhouse gas emissions are from the induction and distribution of vehicle travel that results from new infrastructure projects. A growing body of research demonstrates that increasing roadway and highway capacity induces automobile use. We strongly recommend induced demand be considered in assessing impacts from such projects in the RTP. With this in mind, we recommend including a discussion of assumptions underlying Vehicle Miles Traveled and Greenhouse Gas Emissions estimates provided in the document.

In the Absence of Finalized GHG Thresholds Guidance, EPA Recommends Referring to Draft Guidance and/or Finalized Guidance From Other Air Quality Management Districts.

As the RTP states, at this time, no comprehensive federal or state-wide guidance exists for consideration of GHG emissions significance thresholds in environmental review documents. However, guidance has been developed by Air Quality Management Districts around the state, including the San Joaquin Air Quality Management District (SJAQMD). EPA recommends including a discussion of this guidance in the RTP/EIR. Furthermore, the Bay Area Air Quality Management District (BAAQMD) recently finalized its GHG significance threshold guidance, and includes principles that could be applied throughout the state.

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In the RTP, Discuss Preparation for a Carbon Constrained Future Transportation Network.

A significant fraction of the built environment that will exist in Fresno County at the planning horizon of this RTP has yet to be built. Thus, significant opportunities exist to make substantial changes to land use development patterns. Because land use has significant direct influence on factors such as mode choice and average trip distance, and therefore indirect influence on factors such as air quality and greenhouse gas emissions, opportunity exists for significant change from current trends. EPA recommends including a discussions of estimates of the range of possibility with respect to these factors, and a discussion of the factors limiting these possibilities (e.g. funding, institutions, politics).

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Pages 4-29 and 4-30 of the RTP contain a discussion that recognizes the need for Transportation Demand Management (TDM) to take on some of the traditional role of roadway expansion:

Modifying travel demand is a critical issue. It is becoming increasingly apparent that financial, energy, and environmental resources are slowly being overburdened by the need to satisfy ever-increasing demand for travel. Over time it will be necessary to develop and implement a variety of measures to reduce this demand. The measures range from the provision of various incentives to promote multi-occupancy vehicle use (i.e. rideshare and transit), alternative modes such as non-motorized and rail, and trip reduction through various land use planning mechanisms.

EPA applauds the inclusion of this discussion on the need for Travel Demand Management to complement roadway expansion, discussing both more immediate solutions (such as ridesharing and vanpools) as well as potential long-term solutions (such as roadway tolling). We further believe that anticipated fiscal and environmental constraints on the transportation system warrant consideration of stronger measures. While we recognize there may not be an opportunity to include a comprehensive discussion and analysis of these measures in this RTP update, we recommend expanding this discussion with an eye toward the next RTP cycle. We recommend such a discussion focus primarily on opportunities and secondarily on constraints.

Many factors influence transportation greenhouse gas emissions. While population and employment growth drive transportation activity, these two factors are moderated by a number of others that influence travel behavior, which COFCG is in a position to influence directly or indirectly. We encourage you to identify in this RTP measures to achieve regional climate goals such as incentivizing more transportation-efficient land use patterns and implementing a broader array of transportation demand management measures.

In particular, discussion of several of the EIR's impacts and mitigation measures rely on the argument that COFCG does not have land use authority and therefore cannot affect travel demand. While it is true that COFCG does not have direct control over land use, it can facilitate local jurisdictions in the region, coordinate and build consensus through blueprint planning already underway. A number of incentive programs are available to help fund such coordination (see attached list). Further, COFCG can use its role in transportation network planning to influence growth.

Expand COFCG's Discussion of impacts to Critical Habitat Areas and Connect It to a Broader Regional Mitigation Strategy in the RTP.

The RTP DEIR states that the plan may conflict with "an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Planning (NCCP) program or other approved local, regional or state HCP," noting that mitigation will take place in project-level environmental analysis. EPA recommends listing such plans where they exist. Where they do, EPA strongly recommends such plans be considered in the regional transportation planning process.

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The following are EPA's recommendations for expanding COFCG's strategy for biological and sensitive habitat mitigation:

- Use resource data to inform transportation decision-making.
- Use watershed, conservation, and recovery plans to identify important environmental considerations for the COFCG region, such as critical wildlife corridors, the most important areas to protect for sensitive species, and areas with a high concentration of resources.
- Give conservation plans as much weight as General Plans when planning transportation investments.
- Incorporate concepts such as 100 to 200 foot buffers for stream corridors, and identification and improvement of priority culverts that currently restrict wildlife corridors and natural processes of stream and river systems.
- Use parcel maps to identify larger, undivided parcels for ease of acquisition and preservation, and designate areas as potential future mitigation sites.
- Consider the resource, "Eco-logical: An Ecosystem Approach to Developing Infrastructure Projects" (2006)¹ which encourages Federal, State, Tribal and Local partners involved in infrastructure planning, design, review, and construction to use flexibility in regulatory processes. Specifically, Eco-Logical puts forth the conceptual groundwork for integrating plans across agency boundaries, and endorses ecosystem-based mitigation - an innovative method of mitigating infrastructure impacts that cannot be avoided.

The Regional Mitigation Strategy contained in the RTP should also establish the foundation for innovative regional mitigation solutions:

- Identify financial mechanisms to fund mitigation, such as development fees, sales tax, or the use of funds from alternative methods to identify and protect critical resource areas.
- Establish conservation easements that connect to and expand existing conservation areas.
- Describe locally-developed measures such as county/city designation of open-space, measures requiring development set-backs near streams, etc.

Describe the Use of Available Data to Inform Regional Transportation Planning Decisions.

SAFETEA-LU directs MPOs to compare transportation plans with other plans, maps, and data of inventories of natural or historic resources, if available. The RTP should therefore include a discussion of other data, plans, or maps that may be useful to inform long-range transportation planning. EPA recommends that the RTP specifically describe how the proposed transportation network has been designed to avoid resources identified in data sources such as those identified below:

- U.S. Fish & Wildlife Service species recovery plans

¹ Eco-logical is available on-line at: http://www.environment.dhwa.dpr.gov/ecological/eco_index.asp. Information on pilots using Eco-logical principals is available on-line at: http://www.trb.org/StrategicHighwayResearchProgram2SHRP2/Public/Pages/capacitypilottests_334.aspx.

- USDA Natural Resources Conservation Service wetland data
- Nature Conservancy data and regional planning documents
- California Department of Fish and Game Natural Diversity Database
- Local non-profit and land trust group information

EPA values the opportunity to be involved in the regional transportation planning process. When the final RTP and EIR are available, please send a copy of each to the address above (mail code CED-2). If you have any questions about our comments, please contact me at 415-947-4121 or ganson.chris@epa.gov.

Sincerely,



Chris Ganson, Transportation Planning Lead
Environmental Review Office

cc: Garth Hopkins, Caltrans Headquarters
Paul-Albert Marquez, Caltrans District 6
Aimee Kratovil, Federal Highway Administration
Eric Eidlin, Federal Transit Administration
Roberta Gerson, US Fish and Wildlife Service

**Fresno COG 2011 Regional Transportation Plan
FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT**

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

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*Flex your power!
Be energy efficient!*

June 14, 2010

Mr. Clark Thompson, Planner III
Council of Fresno County Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

Dear Mr. Thompson:

Thank you for the opportunity to review the Council of Fresno County Governments Draft 2011 Regional Transportation Plan.

Caltrans, at both District 6, and various divisions within the Department has reviewed the Draft 2011 RTP of the Council of Fresno County Governments. We collectively offer our comments, suggestions and questions on the following:

District 6 – Planning

Fresno COG has provided current projects, future proposals and a thorough analysis of their region. Fresno COG's RTP must be consistent with the Regional Transportation Improvement Plan (RTIP) to program projects for the State Transportation Improvement Plan (STIP). Fresno COG has incorporated a 25 year planning process of projects.

Corridor preservation of State Highways and intersecting roadways is important to Caltrans. The District will continue to work on developing corridor preservation strategies with the local jurisdictions and Fresno COG, including the development of conceptual alignments of corridors and footprints of interchanges (for planning purposes) on facilities that will require expansion in the foreseeable future. Caltrans believes that preserving and protecting the needed right-of-way for future expansion of State facilities will greatly benefit the State, local communities and the public with regard to a logical and orderly process for subsequent delivery of projects.

Fresno COG's RTP addresses Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, which specifies that by the year 2020 greenhouse gas emissions within the state must be at 1990 levels. Appendix C in the RTP's Environmental Impact Report (EIR) addresses greenhouse gas emissions. The RTP also includes goals, policies and objectives for the Fresno County Regional Blueprint in the Policy Element. This sets the framework for addressing the provisions of Senate Bill (SB) 375 and a Sustainable Communities Strategy (SCS) or Alternate Planning Strategy (APS) in Fresno COG's next RTP Update.

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In preparing to meet the requirements of SB 375, it is recommended that Fresno COG staff actively participate in two modeling activities that recently received funding. One of the modeling activities will be funded with Proposition 84 Modeling Incentive funds. These funds were allocated to the Strategic Growth Council by the Legislature to improve modeling capacity of Metropolitan Planning Organizations (MPOs) to meet the requirements of SB 375. The San Joaquin Valley MPOs were awarded \$2.5 million of Proposition 84 funds, which will be administered by Fresno COG in coordination with the other San Joaquin Valley MPOs.

The second modeling activity is the Central Valley MPOs I-Place's Pilot Project, funded with \$350,000 in State Planning and Research funds to develop a current conditions layer in the I-Place's parcel-based model using UPLAN data sets from the Blueprint planning process. The MPOs modeling staff will also receive valuable training with the I-Place's Program. The funding will also be administered by Fresno COG in coordination with the other valley MPO's

Caltrans completed its Complete Streets Implementation Action Plan in February 2010, which is a significant milestone in implementing Caltrans' Deputy Directive 64-R1 "Complete Streets – Integrating the Transportation System," which was signed in October 2008. Caltrans is committed to providing for the needs of all travelers in all planning, programming, design, construction, operations, and maintenance activities and products on the State highway system. Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system.

This effort of implementing complete streets supports the local agencies' efforts required by the California Complete Streets Act of 2008 (AB 1358). It also supports the goals of reducing greenhouse gas emissions set out by AB 32 and SB 375, which further requires development of sustainable communities' strategies. It is also expected that Complete Streets will be included in our next federal transportation reauthorization bill.

Caltrans would like to commend Fresno COG for including goals, objectives and policies addressing Complete Streets. This is particularly evident under the Fresno County Regional Blueprint Policy Element. Caltrans would like to partner with Fresno COG in the implementation of these goals objectives and policies.

Needs Assessment and Action Element, page 4-23

A Corridor System Management Plan (CSMP) is also a refinement of the DSMP. The CSMP is a long-range planning document that identifies the recommended management strategies for a transportation corridor, not just the highway. The CSMP encompasses all transportation components, taken as a whole, through a geographical area, on a major travel path. The corridor includes the highway, major local parallel arterials, local road intersections, ramps and ramp meters, signal controls, transit, rail, bikes, and pedestrians. The CSMP provides one unified concept for managing, operating, improving, and preserving the corridor across all modes and jurisdictions for the highest productivity, mobility, reliability, accessibility, safety and preservation outcomes. The CSMP approach places greater emphasis on performance assessments and operational strategies that yield higher benefit-to-cost results, and proposes the best mix of improvements, strategies, and actions to optimize corridor performance.

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Needs Assessment and Action Element, page 4-29 (State Route 99 Widening)

Add to end: the widening project funded by Proposition 1b, required the preparation of a Corridor System Management Plan (CSMP) in order to secure funding. The Fresno-Madera Urban Corridor System Management Plan included the section of SR 99 from American Avenue in Fresno County to SR 152 in Madera County. Please see Page 4-13 for more information on CSMPs.

State Route 41

Caltrans District 6 is currently preparing a CSMP to facilitate future planning on SR 41. This CSMP will include the entire length of the SR 41 corridor, including the section in Fresno County. Please see Page 4-13 for more information on CSMPs.

The COG would be the best judge of where this would fit in the current document, but my thought was that it would work in the same section as the 99 widening.

District 6- Transit

Fresno COG is commended for providing an efficient transit facility for the County of Fresno. FCOG is generating more efficient transit standards by promoting, ridesharing, carpooling, bicycle and pedestrian access, and park-and-ride facilities.

In Chapter 3, page 3-1, Policy Element: FCOG's main goal is to *provide an integrated multimodal transportation system which serves the needs of a growing and diverse population for transportation access to jobs, housing, recreation, commercial, and community services*. FCOG provides a transit system that reaches local and rural areas of the County and it serves a diverse population and encourages preservation of existing facilities.

17

Chapter 6, Page 6.5.1, Financial Revenue Projection Methodology, FCOG provides a flow chart that identifies all their funding categories and programs.

Through their public outreach plan they consulted with various focus groups to solicit response through email, road shows, mailings, public meeting, and the world-wide web, facebook and twitter websites to receive feedback on their Regional Transportation Plan FCOG is commended for their transit efforts.

District 6 – Native American Liaison

The Fresno County Council of governments has done excellent work in addressing these issues within their Draft RTP. The comments on the Draft RTP are following:

Chapter 3, Policy Element:

District 06 recommends Environmental Justice and Tribal Consultation & Coordination goals within the Policy Element of the Draft Fresno COG RTP. The work conducted to create the Environmental Justice Plan thorough an Environmental Justice Task Force and Fresno COG's work as part of the Central Valley Tribal Collaboration Transportation Planning Project point to some of the successes of

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Fresno COG's public participation efforts. The 7.2.3 Regional Transportation Plan Public Outreach Plan, II. Summary of RTP Public Outreach Plan Requirements, II. E, Page 7-10, addresses very specifically the consultation and coordination with tribal governments. Chapter 5.11, Page 5-14, mentions the Fresno County Environmental Justice Plan, adopted May 2009, and brings attention to its plans to eliminate barriers and encourage environmental justice communities to take an active role transportation decision-making. The Environmental Justice Plan should be included in Chapter 7 as part of an Environmental Justice section of the Draft Public Outreach Plan. The work is already being conducted for environmental justice and tribal consultation and the accomplishments could be readily acknowledged with goals within the Policy Element of the document.

Chapter 5, Climate change, Page 5-1:

Fresno COG has dedicated an entire chapter (Chapter 5) to address climate change planning within two phases of efforts. The first phase was primarily the adoption of resolution adopted in June, 2008. This phase is laying the groundwork of an interrelated approach for preparing the second phase of planning work. Phase II will conduct all efforts to meet compliance of preparing the 2014 RTP that addresses AB 32, SB 375 (meeting targeted Greenhouse Gas reduction requirements) and all other interrelated efforts such as the San Joaquin Valley Regional Blueprint, modeling updates, etc.

District 6 - Technical Planning Branch

On page 6-14 (Financial Element) at the bottom of the Exhibit 6-2. You have *From California State Controllers Office: Fiscal Year 2007-09. What does this footnote reference?

On page 6-16 (Financial Element) the paragraph under Exhibit 6-4. This paragraph is hard to read. We suggest putting a parenthesis after the word "uses" and after the word "other modes", after "programs and Air Quality", insert a period after the word benefit.

On page 6-17 (Financial Element) Exhibit 6-5, under Project Description, please use the word "new" alignment for Project ID FRE021106, FRE021107, and FRE021108.

On page 6-18 (Financial Element) for Project ID FRE071203 missing the letter "t" for Grantland and Project ID FRE111349 states that SR 269 Bridge @ SR 109 (don't believe there is such a State Route 109).

District 6 - Office of Traffic Operations

The District 6 Office of Traffic Operations has completed its review of the EIR for the Council of Fresno County Governments' 2011 RTP. The vast majority of the 419-page document relates to the typical environmental topics that are analyzed in a standard EIR document (aesthetics, air quality, cultural resources, noise, etc.). The transportation portion of the EIR dealing with roads, streets, and highways relied solely on levels-of-service determined by the Fresno COG model. This office concur that the determination of level-of-service by this methodology is likely adequate for a planning document such as this; however, a more focused study would require a methodology that is consistent with the methodology presented in the most recent edition of the Highway Capacity Manual. The document also seems to rely solely on mass transit and alternative transportation modes (Project) as a

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means to address projected deficiencies on the roads and highways. It is stated on Page 3-197 that “while the Project will improve deficient levels-of-service compared to the No-Build or No-Project alternatives, the Project will not address all deficient levels-of-service anticipated in the future.”

Impact 3.2.1 recommends that individual projects should be consistent with local land use plans that preserve agricultural lands. Impact 3.5.2 goes on to state that Fresno COG does not implement land use policy in Fresno County; rather, this is under the jurisdiction of the County and the various other cities. As such, decisions about the place, pace, and scale of growth and development are reflected in local agency general plans and project approvals approved by those agencies. The 2011 RTP is designed to compliment, rather than change the plans adopted at the county and city levels. Thus the ultimate effect of the 2011 RTP on transportation emissions is not to increase the amount of travel, but rather to influence where and how travel occurs within and through the County. It is correctly indicated in the transportation section of the EIR that most of the segments of State Routes 41, 99, 168, and 180 (Figures 3-8 & 3-10) located within the Fresno-Clovis metropolitan area are projected to operate at unsatisfactory levels-of-service by the year 2035. The most significant factors that are related to transportation planning are land use and the transportation network connecting the various land uses. It is indicated on Page 3-188 that “for the purpose of this environmental analysis, a minimum LOS of ‘D’ is assumed along the Regionally Significant Road System consistent with most local General Plan Circulation Elements.” However, it is the opinion of this office that this is too general of a standard, given the complexity of the various elements that make up the roadway and highway networks. This office suggests adopting standards that are consistent with the 2004 AASHTO Green Book Exhibit 2-32.

21

On Page 3-197 under Mitigation Measures, it is indicated that “A number of local street, road, and State Route segments along the regional street and highway will experience deficient LOS conditions by 2030. Mitigation measures for these segments have not been identified or programmed in the RTP.” It is indicated in the same section that “street and highway needs are constrained by limited funding sources that are necessary to implement additional projects along the regional transportation system.” Improvements that are needed for mitigation to the regional street and highway system that cannot be funded currently should be in the RTP as unconstrained projects.

22

On Page 3-197 under Mitigation Measures, it is indicated that “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...Fresno COG should continue to work with local agencies and Caltrans District 6 to identify alternative improvements, associated costs estimates, and an implementation plan and schedule as part of the Freeway Deficiency Study during update of local general plans and other planning efforts.” Several local governing agencies maintain transportation fee programs. These fee programs consist of list of transportation improvements that are to be funded from the fees collected. Additionally, this office has on several occasions provided a list of improvements on state highways that have been identified from various traffic studies reviewed under Caltrans LD/IGR process, as well as to Fresno COG in the review of the Fresno COG 2010-2011 Overall Work Program.

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On Page 3-197 under Mitigation Measures, it is indicated that “Local agencies should be encouraged to update general, area, community and specific plans to reflect the current status of future street and highway improvements. The timing of improvements should also be regularly updated. These measures

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will help Fresno COG identify appropriate and available funding for planned street and highway improvements along the regional street and road system during development of future RTPs

On Page 3-197 under Significance After Mitigation, it is indicated that "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."

Thanks for the opportunity to review this document. If you have any questions regarding our comments, you may contact David Garza at (559) 445-5999.

Division of Aeronautics:

The Division of Aeronautics wishes to compliment the Fresno COG on the exceptional job of integrating aviation interests into multiple sections of the Draft RTP. There is sufficient detail to see that the COG recognizes aviation as an important component of the regions health and prosperity. Further, the pro-active approach to integrating aviation into a multi-modal transportation planning program is noteworthy for others outside the region to peruse.

Section 4.6.1 Aviation Overview

There is one aviation-related detail in the RTP that needs to be expanded. Section 4.6.1 introduces that coordination of land use planning surrounding an airport lies within the responsibility of the Airport Land Use Commission (ALUC). However, experience tells us there is sufficient confusion regarding the authority of ALUC reviews, Airport Land Use Compatibility Plans (ALUCP's), and local planning processes. We recommend adding a paragraph to the overview that explains how land use policies contained in the ALUCP are reconciled with your RTP transportation and land use policies. Additionally, please help the reader understand who the ALUC is in the Fresno COG area of responsibility.

Comments on the EIR will be provided directly to the CEQA lead agency per standard State Clearinghouse procedures. Feel free to contact me with any questions at 916-651-0597 or Derek.Kantar@dot.ca.gov.

Division of Mass Transportation

The Division of Mass Transportation would like to commend the Governments on the following items: For planning and establishing a comprehensive transit system through efforts such as:

Collaborating and conducting outreach to the public, transit agencies, and surrounding San Joaquin Valley governments (e.g., San Joaquin Valley Intelligent Transportation Systems Strategic Deployment Plan)
Creating an integrated transit service with other regions through fixed routes, paratransit, school bus, taxi, ridesharing, etc.
Continuing efforts to expand and improve your transit services (e.g., Urban and rural transit efforts)

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We would like to offer the following comments for your consideration:

Please note that in the "Table of Content," Section 1.4 states "model" and differs from the "modal" title heading on page 1-12

In addition, please consider replacing the term "disabled" with "people with disabilities" as it may be offensive to some individuals and appears throughout the document, e.g. page 2-11, 4-33, 4-34, 4-35, 4-41, etc. The United States Department of Labor's Office of Disability Employment Policy suggests addressing members of this community with people first language. Please visit the following website for more information:

<http://www.dol.gov/odep/pubs/fact/comucate.htm>

For questions or concerns regarding the listed comments, please contact me at (916) 653-3186, or via email at Ryan.Ong@dot.ca.gov.

Division of Transportation Planning -Office of Goods Movement

A very solid discussion and awareness of key goods movement issues was presented in Chapter 4 of the RTP. Valleywide coordination and resumption of the Quad Counties Freight Advisory Group is noteworthy and should lead to continued and increased goods movement awareness in the region. As is discussion related to rail corridor preservation. The Fresno COG has been a front runner with regards to involvement in the goods movement and freight outreach effort in the Valley. Our suggestion is that you put a chapter sub-heading to identify where the goods movement section is located in this somewhat large document to make for easier review.

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For questions or concerns, please contact Todd LaCasse at (916) 654-7809, or via email at Todd.LaCasse@dot.ca.gov.

Division of Transportation Planning -Office of Regional and Interagency Planning, Regional Outreach Branch

Chapter 2

Please include a statement that the RTP is consistent with the Public Transit-Human Services Transportation Plan. The regional air quality planning authorities in the region should be identified in your discussion.

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Chapter 4:

While there are a minimal number of regional pedestrian trips; there is opportunity to discuss the relationship between transit, bicycling, and pedestrian trips. Commuters are more likely to use transit if they can walk from home and work to transit.

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While there is a good discussion in Chapter 4 of Intelligent Transportation Systems and the development of the regional ITS architecture in the FCOG region, please consider adding a statement that the RTP is consistent (to the maximum extent practicable) with the regional ITS architecture.

We recommend more discussion about regional pedestrian needs. The discussion could include the link between transit ridership and pedestrian access. There is reference to construction of a pedestrian and bicycle facility at Garden Drive and Shaw Place that would support pedestrian policy elements.

Please include a statement that the RTP is consistent with the Public Transit-Human Services Transportation Plan.

Chapter 6:

The projected revenue section is missing a statement ensuring that the first four years of the projected fund estimate is consistent with the 4 year STIP.

We are unable to determine whether the cost estimates for implementing the projects identified in the RTP reflect "year of expenditure dollars" to reflect inflation rates.

Chapter 7:

We would suggest expanding the discussion of the public participation and interagency coordination process in Chapter 7 to clearly demonstrate how FCOG's public outreach and interagency coordination process meets the requirements of 23 CFR 450.316(3)(b) and 23 CFR 450.322(g) 23 CFR 450.316(1)(i-x), CFR 450.316(c), and 23 CFR 450.316(i).

Valleywide Chapter:

We would like to encourage FCOG to begin exploring regional coordination with local jurisdictions, and continue coordination with San Joaquin Valley MPOs in preparation for SB 375 compliance, which will require the region to meet a regional greenhouse gas emissions reduction target which ARB is statutorily required to provide to each region by September 30, 2010. We encourage extensive communication and collaboration amongst all the agencies within the San Joaquin Valley regarding the development of a sustainable communities strategy to meet the requirements of SB 375.

RTP Checklist:

General, Question 1: The checklist page number reference lists chapters 4 and 6. A better reference is 2-1 where FCOG states that the RTP planning horizon is until 2035.

General, Question 4: Please include a discussion of the plan level purpose and need or reference the appropriate section of the RTP.

Consultation/Coordination, Question 9: There is no clear discussion with the regional air quality planning authorities (23 CFR 450.316 (a) and (a) (1) (i)). We recommend including a discussion of the outreach activities associated with the appropriate authorities.

Environmental, Question 4: The section discussing mitigation only references the federal requirements and does not outline activities. Federal regulations require MPOs to include a discussion on the

"Caltrans improves mobility across California"

Mr. Clark Thompson
June 14, 2010
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potential environmental mitigation activities and the potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the RTP, as stated in 23 CFR Part 450.322(f)(7).

General Comments:

The draft RTP should include a signed copy of the RTP Checklist. Please ensure that a signed checklist is contained in the final RTP.

To facilitate timely review and comment on the RTP please include specific page numbers when demonstrating compliance with various provisions on the RTP Checklist. Reference to entire chapters in the Checklist is often insufficient to clearly identify how requirements are met.

If you have any questions please feel free to contact me at (916) 653-4097 or via email at Kevin.tucker@dot.ca.gov.

If you have any questions, please call me at (559) 445-5285.

Sincerely,



CATHY RODRIGUEZ
Transportation Planning North Branch
District 06

cc: Sharri Bender-Ehlert, Paul-Albert Marquez, Marta Frausto, Albert Lee, Dara Wheeler, Kevin Tucker, Todd LaCasse, Sue Kiser, Ray Sukys, Ryan Ong, Gary Cathey, Derek Kantar,