



Final Environmental Impact Report for the

2025 BLUEPRINT

State Clearinghouse No. 2025020168

Prepared for:



October 2025

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SACOG

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LIST OF ABBREVIATIONS

AB	Assembly Bill
CAP	climate action plan
CARB	California Air Resources Board
CARP	County Aquatic Resources Program
CARTA	Capital Area Regional Tolling Authority
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CWA	Clean Water Act
EIR	environmental impact report
EMFAC	Emissions Factor
EPA	US Environmental Protection Agency
ESA	federal Endangered Species Act
GHG	greenhouse gas
HCP	habitat conservation plan
HOT	high-occupancy toll lane
HOV	high-occupancy vehicle
ILF	In-Lieu Fee
IPaC	Information for Planning and Consultation
MLSP	Managed Lanes System Plan
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
NOA	naturally occurring asbestos
NO _x	oxides of nitrogen

PCCP	Placer County Conservation Program
PM _{2.5}	fine particulate matter
SACOG	Sacramento Area Council of Governments
SacRT	Sacramento Regional Transit District
SB	Senate Bill
SR	State Route
TCM	transportation control measure
USDOT	US Department of Transportation
USFWS	US Fish and Wildlife Service
VMT	capita vehicle miles traveled

1 INTRODUCTION

This final environmental impact report (EIR) has been prepared by the Sacramento Area Council of Governments (SACOG), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (14 CCR Section 15132). This Final EIR contains responses to comments received on the Draft EIR for the proposed 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS, referred to as the 2025 Blueprint). The Final EIR consists of the draft EIR and this response to comments document, which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the draft EIR. The final EIR is the mechanism for responding to these comments. The final EIR will be used to support SACOG's decision regarding whether to approve the 2025 Blueprint.

This final EIR may also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the project or that have jurisdiction over implementing portions of the project.

1.2 PLAN AREA

The plan area for the 2025 Blueprint includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties, exclusive of the Tahoe Basin (see Figure 1-1). The SACOG region also includes 22 incorporated cities within its boundaries: Auburn, Citrus Heights, Colfax, Davis, Elk Grove, Folsom, Galt, Isleton, Lincoln, Live Oak, Loomis, Marysville, Placerville, Rancho Cordova, Rocklin, Roseville, Sacramento, West Sacramento, Wheatland, Winters, Woodland, and Yuba City. The plan area has an existing (2020) population of 2,540,353. As of 2020, 71 percent of jobs, 61 percent of housing units, and 62 percent of the population of the plan area were in incorporated cities.

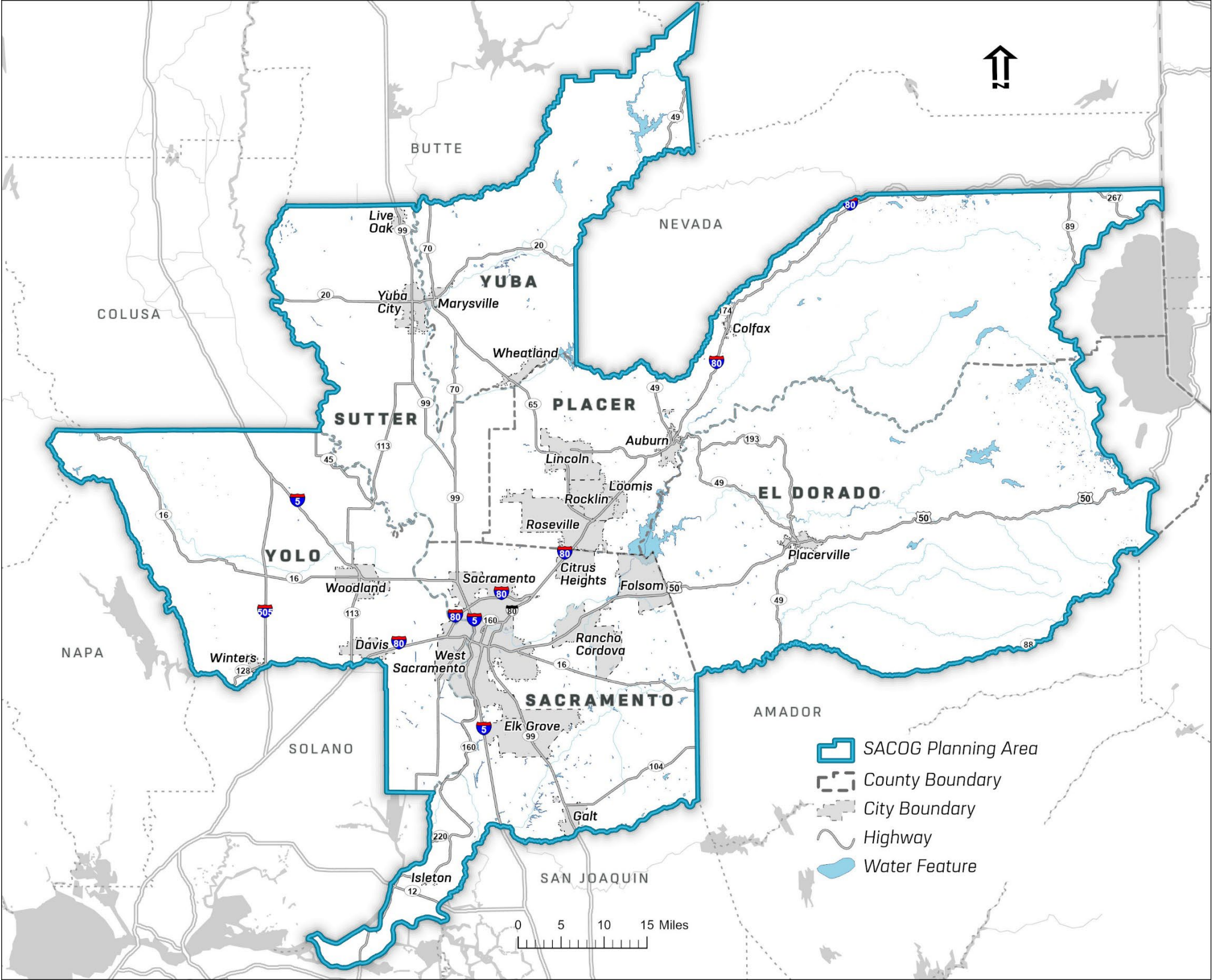
The plan area encompasses approximately 6,000 square miles (3,846,837 acres) and is bounded by Colusa, Lake, Napa, and Solano counties to the west; Butte, Sierra, and Nevada counties to the north; the Lake Tahoe Basin, Plumas, and Alpine counties to the east; and Amador, San Joaquin, and Contra Costa counties to the south. The bulk of the plan area is located in the Sacramento Valley, a basin generally bounded by the Sierra Nevada mountain range to the east and the coastal ranges to the west. The eastern portion of the region – Placer County, El Dorado County, and Eastern Yuba County – is located in the Sierra Nevada mountains and foothills. The western portion of the region, in Yolo County, marks the eastern edge of the coastal mountain ranges. North to south, the plan area spans from the lower Sacramento Valley in northern Sutter and Yuba counties to the Sacramento River Delta in southern Sacramento County. In the valley portion of the plan area – Sacramento County, western Placer County, western Yuba County, Sutter County, and eastern Yolo County – the topography is generally flat, with the exception of the Sutter Buttes mountain range in Sutter County.

The existing transportation system within the plan area supports a broad range of passenger and freight travel. The roadway system includes three interstate highways, several state highways, and numerous local roadways that serve various combinations of auto, truck, pedestrian, bicycle, and transit travel. Other infrastructure includes a deep-water shipping port, a major international airport, numerous general aviation airports, and freight and passenger rail service.

1.3 PLAN OBJECTIVES

The primary purpose of the 2025 Blueprint is to meet federal and state requirements for regional transportation plans and sustainable communities strategies. Within this framework, the objectives of the plan are to:

- ▶ Create opportunities for residents to live and work in equitable, environmentally healthy, and economically vibrant communities.
- ▶ Provide a mix of housing types in walkable places that are affordable, that have access to economic opportunity, and that allow people to spend less time driving.
- ▶ Revitalize commercial corridors, rural main streets, and green zones (established by local jurisdictions as part of a SACOG program known as Green Means Go, Green Zones are areas that have capacity for infill growth, but face market or other barriers that have prevented development from occurring).
- ▶ Create complete communities by bringing housing to the jobs and jobs to the housing.
- ▶ Protect agricultural and natural lands.
- ▶ Identify policies and strategies that reduce per capita, passenger vehicle-generated GHG emissions by 19 percent to achieve the target set by the California Air Resources Board (CARB) under SB 375.
- ▶ Implement innovative mobility projects, invest in high-capacity corridors and high-frequency bus service, prioritize lower cost transit solutions, and improve the responsiveness of the transportation system.
- ▶ Reduce per capita vehicle miles traveled (VMT).
- ▶ Build and maintain a safe, reliable, and multimodal transportation system.
- ▶ Find new and innovative ways to finance the costs of building and maintaining the transportation system in both the near- and long-term.
- ▶ Plan for natural disasters and extreme weather, including the need to evacuate or provide emergency services during natural disasters.



Source: Prepared by SACOG in 2025.

Figure 1-1 Plan Area

1.4 SUMMARY DESCRIPTION OF THE PROJECT

The Blueprint is a long-range (at least 20-year) comprehensive plan for the region's multi-modal transportation system that is required for the region to qualify for some federal and state transportation funding for public transit, streets/roads, and bicycle and pedestrian improvements. The proposed 2025 Blueprint incorporates countywide transportation planning developed by the El Dorado County Transportation Commission and the Placer County Transportation Planning Agency under memoranda of understanding between those agencies and SACOG. SACOG's last adopted MTP/SCS was published in 2019 and has a 2040 planning horizon.

The 2025 Blueprint aims to achieve various federal, state, regional, and local policy objectives related to sustainable development, transportation, and GHG emission reduction while considering financial, growth, and regulatory constraints. The plan is built on extensive data analysis, public outreach, and collaboration with local agencies and experts while being grounded in the board-adopted Triple Bottom Line framework, emphasizing a balanced approach to equity, economy, and environment.

For the 2025 Blueprint, the forecast of growth (called the regional growth projections) was adopted by the SACOG board in 2022 and anticipates that the region will grow by approximately 580,000 people, and will add just over 260,000 new jobs, and 278,000 new homes. The 2025 Blueprint is designed to achieve the regional SB 375 GHG target while prioritizing maintenance and rehabilitation of existing infrastructure. It integrates smart land use planning principles with a diverse and efficient transportation network. The plan identifies targeted transportation investments, including new capital improvements (e.g., highways, roads, bridges, and light rail), policies such as roadway pricing strategies (e.g., tolling and mileage fees), and multimodal benefits aimed at connecting housing to jobs, managing congestion, and addressing forecasted travel volumes.

1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

Due to SACOG's limited authority to impose mitigation at the project-level, this Draft EIR identifies a substantial number of significant and unavoidable impacts. These impacts may be: (1) less than significant after mitigation but identified as significant and unavoidable because SACOG cannot compel agencies to implement mitigation, (2) assumed significant and unavoidable because of uncertainty of the level of specific impacts associated with individual projects, or (3) significant and unavoidable after mitigation is implemented or because no feasible mitigation can be identified. The following lists impacts that are within the latter two categories identified above (i.e., the implementation of identified mitigation measures would not reduce the impact to a less-than-significant level).

- ▶ **Aesthetics:** Substantially Degrade the Existing Visual Character or Quality of Public Views of the Site and Its Surroundings in Non Urbanized Areas.
- ▶ **Agricultural and Forestry Resources:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to Non-Agricultural Use; Conflict with Existing Zoning or General Plan Land Use Designations for Agricultural Use, or with a Williamson Act Contract; Conflict with Existing Zoning or Land Use Designation for, or Cause Rezoning of, Forest Land, Timberland, or Timberland Zoned Timberland Production; Result in the Loss of Forest Land or Conversion of Forest Land to Non-Forest Use; Involve Other Changes in the Existing Environment that could Result in Conversion of Farmland to Non-Agricultural.
- ▶ **Air Quality:** Be Inconsistent with Or Exceed Applicable Thresholds of Significance Established by The Local Air District For Long-Term Operational Criteria Air Pollutant Emissions and Short-Term Construction Criteria Air Pollutant Emissions; Expose Sensitive Receptors to Substantial TAC Concentrations, Including Those from Construction and Operational Emissions.
- ▶ **Cultural Resources:** Cause a Substantial Adverse Change in the Significance of a Historical Resource; Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources.

- ▶ **Greenhouse Gas Emissions and Energy:** Be inconsistent with the State’s ability to achieve the 2030 reduction target of SB 32 and carbon neutrality by 2045, consistent with AB 1279; Increase GHG Emissions from Project Construction Activities Resulting from the 2025 Blueprint in a Manner Inconsistent with Achievement of the State’s Climate Goals.
- ▶ **Noise:** Result in Temporary Noise Levels in the Vicinity of the Project that Exceed FTA Recommended Standards or Generate a Substantial Temporary Increase in Ambient Noise Levels.
- ▶ **Public Services:** Result in Substantial Adverse Physical Environmental Impacts Associated with the Provision of New or Physically Altered Governmental Facilities in order to Maintain Acceptable Service Ratios, Response Times or Other Performance Objectives for Fire Protection, Police Protection, Schools, Libraries, Social Services, and/or Other Public Services.
- ▶ **Recreation:** Increase the Use of Existing Neighborhood and Regional Parks or Other Recreational Facilities such that Substantial Physical Deterioration of the Facility Could Occur or be Accelerated.
- ▶ **Transportation:** Result in a Change in per Capita VMT that is Inconsistent with CARB’s 2022 Scoping Plan
- ▶ **Tribal Cultural Resources:** Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource.
- ▶ **Utilities and Service Systems:** Have Insufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development During Normal, Dry and Multiple Dry Years; Require or Result in the Relocation or Construction of New or Expanded Water, Wastewater, Treatment or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities, the Construction or Relocation of Which Could Cause Significant Environmental Effects.
- ▶ **Wildfire:** Exacerbate Wildfire Risks, Thereby Exposing People or Structures to a Significant Risk of Loss, Injury, or Death, or Exposing Project Occupants to Pollutant Concentrations or People or Structures to Significant Risk of Downslope or Downstream Flooding or Landslides as a Result of Post-fire Slope Instability.

1.6 CEQA PUBLIC REVIEW PROCESS

On June 6, 2025, SACOG released the Draft EIR for a 63-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on SACOG’s website (<http://www.sacog.org/planning/2025-blueprint/draft-environmental-impact-report>); and was made available at the SACOG offices in Sacramento and the main branch library for each of the six counties in the SACOG region. A notice of availability of the Draft EIR was published in the Sacramento Bee and distributed by SACOG to a project-specific mailing list.

A public hearing was held on July 9, 2025, to receive input from agencies and the public on the draft EIR. The hearing was held at the SACOG offices in Sacramento at 6:00 pm. No comments were received at the hearing.

As a result of these notification efforts, written and verbal comments were received from seven agencies and Tribes on the content of the Draft EIR. Chapter 3, “Responses to Comments,” identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute “significant new information” by CEQA standards (State CEQA Guidelines Section 15088.5).

1.7 ORGANIZATION OF THE FINAL EIR

This final EIR is organized as follows:

Chapter 1, “Introduction,” describes the purpose of the final EIR, summarizes the 2025 Blueprint and the major conclusions of the draft EIR, provides an overview of the CEQA public review process, and describes the content of the final EIR.

Chapter 2, "Project and Regulatory Updates," presents minor updates related to the 2025 Blueprint as a result of ongoing planning and design refinements since release of the Draft EIR, as well as changes made in response to comments received on the proposed plan. This chapter also discusses changes to State regulation that have occurred since preparation of the Draft EIR.

Chapter 3, "Responses to Comments," contains a list of all parties who submitted comments on the Draft EIR during the public review period, comment received, and followed by a response to each comment. In addition, while not required by CEQA, this chapter includes comments received on the 2025 Blueprint and provides responses to those comments.

Chapter 4, "Revisions to the Draft EIR," presents revisions to the draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections.

Chapter 5, "References," identifies the documents used as sources for the analysis.

Chapter 6, "List of Preparers," identifies the lead agency contacts as well as the preparers of this final EIR.

2 PROJECT AND REGULATORY UPDATES

CEQA requires recirculation of an EIR when the lead agency adds “significant new information” to an EIR, regarding changes to the project description or the environmental setting, after public notice is given of the availability of a draft EIR for public review under State CEQA Guidelines, California Code of Regulations (CCR) Section 15087, but before EIR certification (State CEQA Guidelines Section 15088.5[a]). Recirculation is not required unless the EIR is changed in a way that would deprive the public of the opportunity to comment on significant new information, including a new significant impact in which no feasible mitigation is available to fully mitigate the impact (thus resulting in a significant and unavoidable impact), a substantial increase in the severity of a disclosed environmental impact, or development of a new feasible alternative or mitigation measures that would clearly lessen environmental impacts but that the project proponent declines to adopt (State CEQA Guidelines Section 15088.5[a]). Recirculation is not required when the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (State CEQA Guidelines Section 15088.5[b]).

Several modifications have been made to the 2025 Blueprint since release of the Draft EIR. These changes occurred as a result of policy direction from the SACOG Board, language refinements initiated by staff, and changes made in response to comments on the Draft EIR. As explained below, these changes generally clarify the intent and implementation of the policy or action and are within the scope of the environmental effects disclosed in the Draft EIR.

2.1 CHANGES TO THE 2025 BLUEPRINT

The 2025 Blueprint has been updated where needed to respond to comments, to add clarification, and provide corrections in the text, figures, and tables, and plan appendices. The text of some policies, implementation actions, and jurisdictional highlights have been revised or updated. These changes were primarily made in response to public comments on the Draft EIR and Draft 2025 Blueprint but also include staff-initiated clarifications and technical corrections. Select appendices, including Transportation Project List, Land Use Documentation, Plan Performance, Conformity Analysis, and Outreach, were updated to incorporate additional summary information and corrections noted during the review of the Draft 2025 Blueprint.

2.2 REGULATORY CHANGES

If regulations themselves change after circulation of an EIR, the CEQA lead agency must evaluate whether those changes introduce significant new information. If they do, recirculation may be triggered. Otherwise, the agency can document the changes and proceed, as long as the final decision is supported by substantial evidence in the administrative record.

Generally, regulatory changes do not constitute significant new information because regulations typically create new or more stringent environmental regulations, which by their nature reduce environmental impacts. However, during either preparation or circulation of the Draft EIR, several new regulations were passed that are intended to reduce environmental regulation or facilitate construction with less environmental review. A discussion of these new regulations and explanation of why they do not constitute significant new information is provided below.

2.2.1 Public Law 119-15, Public Law 119-16, and Public Law 119-17

In May 2025, while overriding the Senate parliamentarian, the US Senate voted to overturn three waivers that the EPA has granted to California to set vehicle emission standards that are stricter than the federal government standards. The US Senate took this action using the Congressional Review Act. Substantial questions remain whether this Congressional action was legal, with the Government Accountability Office determining that it is not (US Government Accountability Office 2025). Nonetheless, in June 2025, the president signed Public Law 119-15, Public Law 119-16, and

Public Law 119-17, effectively nullifying California's ability to enforce its regulations under three statewide programs: Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Low NO_x Omnibus (Low NO_x). In late 2025, California Attorney General Rob Bonta led a coalition of 10 state attorneys general in filing a lawsuit challenging the federal government's actions. This litigation is ongoing as of the date of publication of this Final EIR.

The 2025 Blueprint is a 20-year transportation plan, and it is unclear whether the nullification of California's waivers will be a long-term action given that 10 states are currently engaged in a lawsuit challenging the federal government's revocation of the waivers, an action which the US Government Accountability Office and Senate Parliamentarian have already said was not legal. At the very least, complex legal issues remain unresolved and yet to be decided by courts. Some vehicle manufacturers who already meet the current requirements of Advanced Clean Cars II, Advanced Clean Trucks, and Low NO_x may be hesitant to revert to less progressive manufacturing processes in an uncertain legal environment. Several manufacturers have already invested in technology toward meeting Advanced Clean Cars II, such as manufacturers that now offer a line of electric vehicles. There are inherent financial risks associated with changing manufacturing processes or abandoning investments into an entire product line for what might be a short-term standard, pending the outcome of legal proceedings. In the past, waiver revocations were reversed when a new administration came into office. Additionally, Governor Newsom signed Executive Order N-27-25 on June 12, 2025, directing CARB and other applicable state agencies to assess action to spur or incentivize continued consistency with Advanced Clean Cars II. For this reason, it is likely that manufacturers will continue to produce vehicles that meet Advanced Clean Cars II, Advanced Clean Trucks, and Low NO_x at least through the duration of legal proceedings, which are likely to be lengthy given the complexity and likelihood of appeal by either party.

As described in Section 3.3, "Air Quality," of the Draft EIR, the Draft EIR evaluated potential impacts related to conflicts with or obstructions of implementation of applicable air quality plans by determining whether the 2025 Blueprint would be in conformity with the applicable air quality plans. The determination of conformity is based on emissions of the project, which were estimated using the CARB Emissions Factor (EMFAC) 2021 Model. The EMFAC 2021 Model incorporates applicable state emissions standards, including Advanced Clean Cars II, Advanced Clean Trucks, and Low NO_x.

Section 15125(e) of the CEQA Guidelines states that when a proposed project is compared with an adopted plan, the analysis shall examine the existing physical conditions at the time the notice of preparation is published. The notice of preparation for the 2025 Blueprint Draft EIR was published on February 5, 2025. Public Law 119-15, Public Law 119-16, and Public Law 119-17 were not signed into law until June 2025. Therefore, the analysis of conformity with applicable air quality control plan correctly uses modeling that includes emissions assuming implementation of Advanced Clean Cars II, Advanced Clean Trucks, and Low NO_x because this is the regulatory setting that existed at the time the notice of preparation was published. The EMFAC 2021 Model was the best available at the time of the analysis because it accounted for the existing regulations in place at the time, including Advanced Clean Cars II, Advanced Clean Trucks, and Low NO_x. Further, regulators have provided no recommendations or adjustments to the EMFAC 2021 Model to date to account for Public Law 119-15, Public Law 119-16, and Public Law 119-17.

Because the 2025 Blueprint would continue to conform with applicable air quality plans when modeled with EMFAC 2021, and the MTP/SCS was in conformance with previous EMFAC models prior to Advanced Clean Cars II, Advanced Clean Trucks, and Low NO_x, and because some vehicle manufacturers would likely continue to produce cars meeting these standards despite regulatory uncertainty, the analysis in the Draft EIR does not substantially change as a result of Public Law 119-15, Public Law 119-16, and Public Law 119-17. These laws are not significant new information requiring recirculation of the Draft EIR.

2.2.2 SB 130 and AB 131

On June 30, 2025, Governor Newsom signed two budget trailer bills into law: Assembly Bill (AB) 130 and Senate Bill (SB) 131, which modified CEQA and became effective upon signature. The CEQA-related provisions of AB 130 focus primarily on streamlining approvals of housing projects, the centerpiece being a new statutory exemption from CEQA for infill housing projects. This exemption, codified as Section 21080.66 of the Public Resources Code, describes the specific provisions and requirements for the housing project to be exempt from CEQA. Among these provisions are

that the project site must be within the boundaries of an incorporated municipality or located within an urban area, and the site must also be an urban infill site and meet certain minimum density requirements. There are other requirements as well; for example, the project must not require the demolition of a listed historic structure and the local government must consult with any interested California Native American tribes.

Additionally, while the state's Permit Streamlining Act did not apply to ministerial projects, AB 130 amended the Permit Streamlining Act to cover any "housing development project...regardless of whether the process for permitting that entitlement is discretionary or ministerial." It added a new 60-day time limit to approve or disapprove ministerial projects, except for projects subject to the Affordable Housing and High Road Jobs Act of 2022 (AB 2011), and a streamlined ministerial approval process for eligible residential developments in certain commercial zones.

AB 130 also creates a new funding regime for projects to mitigate their vehicle miles travelled (VMT) impact, at the lead agency's discretion, by paying a fee to fund transit-oriented development and affordable housing. However, AB 130 does not specify the amount of the fee, nor does it confirm whether payment of the fee will fully mitigate project impacts. The Governor's Office of Land Use and Climate Innovation (previously the Office of Planning and Research) is required to issue initial guidance for implementing this new VMT mitigation by July 1, 2026.

AB 130 does not affect the analysis in the Draft EIR because it is a program-level document and AB 130 provides project-level exemption and streamlining benefits. This Draft EIR broadly addresses types of impacts associated with implementation of the 2025 Blueprint, as it cannot determine the precise locations, size, and design, or site-specific environmental characteristics of future individual proposed projects. This level of analysis reflects the programmatic nature and regional scale of the 2025 Blueprint. Feasible mitigation measures are identified in the Draft EIR to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with State CEQA Guidelines Section 15126.4. However, SACOG does not have regulatory or approval authority over most future projects evaluated in this Draft EIR and SACOG cannot require local implementing agencies to adopt mitigation measures. Because SACOG lacks the authority to impose the mitigation measures at the project-level, the Draft EIR does not factor the mitigation measures into the ultimate significance determination for each impact. Therefore, the Draft EIR discloses the potential environmental effects of projects that may qualify for this exemption at a programmatic level.

Although AB 130 could incentivize and therefore intensify infill residential development in urban areas by providing an exemption from CEQA, this type of development pattern would be consistent with the vision of the 2025 Blueprint. The 2025 Blueprint envisions housing proximate to transit and active transportation modes, which are typically on infill sites and/or sites within the boundaries of an incorporated municipality or an urban area. The 2025 Blueprint locates the densest urban development proximate to transit. In this sense, the Draft EIR evaluates a development pattern that AB 130 attempts to facilitate and encourage. Additionally, if implementing agencies determine that individual residential projects are exempt from CEQA pursuant to AB 130, that would not change the Draft EIR analyses, which are for the regional growth envisioned in the 2025 Blueprint. In other words, AB 130 does not change programmatic CEQA documents, such as the Draft EIR, but instead provides a potential exemption option for individual infill residential projects in urban areas that meet certain criteria.

Additionally, the changes to the Permit Streamlining Act resulting from AB 130 do not affect the Draft EIR analysis because the 2025 Blueprint is not a housing project and adoption does not involve issuance of a permit. The Draft EIR analyzes the impacts associated with buildout of the 2025 Blueprint at a programmatic plan level (i.e., the totality of all future regional growth, land use change, and transportation network improvement projects). No permits subject to the Permit Streamlining Act are requested for adoption of the 2025 Blueprint (see Draft EIR Section 2.7.2, *Actions to Adopt and Implement the Proposed Plan*). Individual housing projects in the jurisdictions in the Plan Area may be subject to the Permit Streamlining Act, including changes created by AB 130, but applicability of the Permit Streamlining Act does not affect the environmental impact analysis in the Draft EIR.

The Draft EIR provides mitigation measures that would allow for implementing agencies in the SACOG region to reduce the VMT impacts of individual projects. Specifically, Mitigation Measure 3.16-1 beginning on page 3.16-44 of the Draft EIR provides a list of project modifications that implementing agencies can use to reduce the VMT impacts of individual projects. Mitigation Measure 3.16-1 indicates that the list of project modifications is not exhaustive and

should not be limited. Therefore, Mitigation Measure 3.16-1 does not prohibit the use of the new funding regime for mitigating VMT impacts that AB 130 established. Further, Mitigation Measure 3.16-1 also states that implementing agencies shall require project modifications during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction. The pending guidance for using this new VMT mitigation will be from the state (i.e., Governor's Office of Land Use and Climate Innovation), consistent with the requirements stated in Mitigation Measure 3.16-1.

Because AB 130 pertains to exemptions for infill housing projects and the 2025 Blueprint is an MTP/SCS, AB 130 does not affect the impact analysis in the 2025 Blueprint Draft EIR. The VMT mitigation created by AB 130 is consistent with the mitigation measures included in the Draft EIR to reduce the VMT impacts of the 2025 Blueprint. Therefore, AB 130 is not new significant information or a new mitigation measure that would potentially reduce a significant and unavoidable impact such that recirculation of the Draft EIR is required.

SB 131 concerns housing development projects that narrowly fail to qualify for any CEQA exemption (including AB 130) due to a single disqualifying condition. In such instances, SB 131 limits the CEQA review to those environmental effects caused solely by that condition and waives the need for analysis of project alternatives, cumulative impacts, and growth-inducing effects. SB 131 also exempts from CEQA rezoning actions that implement the provisions of a housing element adopted pursuant to Government Code section 65583(c), as well as agricultural employee housing projects. SB 131 is also not new significant information because it concerns housing development projects that narrowly fail to qualify for any CEQA exemption due to a single disqualifying condition. The 2025 Blueprint is an MTP/SCS and not a housing development project or a rezoning project.

3 RESPONSES TO COMMENTS

The Draft Environmental Impact Report (EIR) for the 2025 Blueprint was released on July 15, 2024, for a 60-day public review period that concluded on August 8, 2025. The Sacramento Area Council of Governments (SACOG) provided distinct opportunities for public engagement on the Draft EIR and the content of the 2025 Blueprint. Comments on the Draft EIR could be submitted through email (eircomments@sacog.org) or mailed to SACOG. In addition, the State Clearinghouse collected comments from state agencies.

Table 3-1 presents the list of commenters, including the alphanumeric designation for each comment letter received, the author of the comment letter, and the date of the comment letter. Nine comment letters were submitted on the Draft EIR from agencies and tribal organizations during the comment period (designated as “A” and “T” letters, respectively, below). No comments were made on the Draft EIR by the general public.

An additional 14 comments were submitted on the 2025 Blueprint through the plan email (blueprint@sacog.org), mailed to SACOG’s address, or submitted through an online form. These comments are identified with “BP” below and were received from public agencies, nongovernmental organizations, and individuals. While not required under CEQA, responses to comments raised on the 2025 Blueprint are included in this Final EIR document for ease of reference.

No comments were collected at the three public hearings held for the 2025 Blueprint and Draft EIR on June 25, July 9, and July 31, 2025.

Table 3-1 List of Commenters

Letter No.	Commenter	Date
COMMENTS ON THE DRAFT EIR: AGENCIES		
A1	California Geological Survey Brian Olson, CEG, Senior Engineering Geologist	July 11, 2025
A2	Delta Stewardship Council Jeff Henderson, Deputy Executive Director	July 24, 2025
A3	Feather River Air Quality Management District Sondra Spaethe, planning and Engineering Supervisor	August 5, 2025
A4	Central Valley Regional Water Quality Board Peter G. Minkel, Engineering Geologist	August 5, 2025
A5	California Department of Transportation, District 3 Sukhvinder (Sue) Takhar, Deputy District Director – Planning, Local Assistance, and Sustainability	August 7, 2025
A6	Placer County Community Development Resource Agency Leigh Chavez, Principal Planner/Environmental Coordinator	August 7, 2025
A7	Sacramento Metropolitan Air Quality Management District Paul Philley, AICP, Transportation and Climate Change Program Manager	August 8, 2025
COMMENTS ON THE DRAFT EIR: TRIBES		
T1	United Auburn Indian Community Anna M. Starkey, M.A., RPA, Cultural Regulatory Manager	June 10, 2025
T2	Yocha Dehe Wintun Nation Gayle Totton, Tribal Resources Manager	July 23, 2025

Letter No.	Commenter	Date
COMMENTS ON THE 2025 BLUEPRINT		
BP1	Cynthia Crosby	May 29, 2025
BP2	Franklin Boulevard Business Association Michael Boken, Executive Director	June 5, 2025
BP3	City of West Sacramento Jason McCoy	June 18, 2025
BP4	City of Folsom Rebecca Neves, PE, City Engineer	July 17, 2025
BP5	Sam Swenson	July 24, 2025
BP6	Lawrence Geeslin	June 26, 2025
BP7	Shana Lasensky	July 29, 2025
BP8	Ashley Weiss	July 29, 2025
BP9	Yolo Transportation District Autumn Bernstein, Executive Director	July 30, 2025
BP10	Antero Rivasplata	August 2, 2025
BP11	Power in Nature Steve Schweigerdt	August 5, 2025
BP12	City of West Sacramento Andrea Ouse, AICP, Community Development Director	August 8, 2025
BP13	California Air Resources Board Carey Knecht, Chief, Transportation and Land Use Planning Branch	August 8, 2025
BP14	Sutter County Development Services Neal Hay	August 8, 2025

For ease of review, individual comments addressing separate subjects within each letter are labeled based on the letter's numeric designation and comment number (e.g., the first comment in the first letter is Comment A1-1). The text of the comments has been provided, followed by a response. The text of the comment letters below are reproduced exactly as they were submitted. Spelling, grammatical, and other errors in the original letters have not been corrected. Note that the preface language of the letters is often excluded (where the text consists of salutations and brief descriptions of the commenting organization). Comment letters are included in their entirety in Appendix A.

In conformance with Section 15088(a) of the State CEQA Guidelines, written responses are provided to address comments on environmental issues received from reviewers of the Draft EIR. Where comments are not related to the Draft EIR or the analysis of environmental impacts, response is not required (Public Resources Code Section 21091[d]; State CEQA Guidelines Sections 15088[c], 15204[a]). Comments on the 2025 Blueprint are responded to below for informational purposes. All comments are acknowledged for the record and will be forwarded to the decision makers for consideration.

3.1 COMMENTS AND RESPONSES

3.1.1 Comments on the Draft EIR: Agencies

Letter A1 California Geological Survey

Brian Olson, CEG, Senior Engineering Geologist

July 11, 2025

Comment A1-1

1. Liquefaction and Landside Hazards

- ▶ The DEIR summarizes the Seismic Hazards Mapping Act of 1990 on page 3.6-2, which directs CGS to create Zones of Required Investigation for liquefaction and earthquake-induced landslides. There is also a general discussion of liquefaction hazards and conditions on page 3.6-21 and 3.7-12. However, the DEIR notes on page 3.6-27 "Because soil liquefaction is typically associated with seismic [hazard] zones, it is unlikely that soil liquefaction would occur in the plan area and adversely affect transportation improvements." CGS encourages SACOG to evaluate liquefaction hazards based on sediment types, historic groundwater levels, and proximity to seismic sources. CGS has not evaluated all areas of the state for liquefaction hazard zones pursuant to the Seismic Hazards Mapping Act, therefore, the lack of a CGS Seismic Hazard Zone for any area should not be interpreted to mean a potential seismic hazard is not present, it means the area has yet to be evaluated. It should be noted CGS recently released a preliminary Earthquake Zones of Required Investigation Map for the Sacramento West and Sacramento East Quadrangles on May 22, 2025. These maps and the zones therein will become final and official on or about November 20, 2025.

Response A1-1

SACOG acknowledges that the lack of a California Geological Society (CGS) Seismic Hazard Zone for any area could be due to lack of evaluation rather than an indication that there is not a potential seismic hazard and agrees that evaluation of liquefaction hazards should be based on sediment types, historic groundwater levels, and proximity to seismic sources. As acknowledged in the comment, a characterization of liquefaction hazard is presented on page 3.6-21 of the Draft EIR, which explains:

The potential for liquefaction is highest in areas with high groundwater and loose, fine, sandy soils at depths of less than 50 feet. Based on the sedimentological characteristics of the soils and the depth to groundwater, the liquefaction hazard is expected to be moderate for the portion of the plan area within the Great Valley geomorphic province and low for the portions of the plan area within the Sierra Nevada and Coast Range geomorphic provinces.

The text quoted in the comment from page 3.6-27 is in Impact 3.6-1, which presents an evaluation of the potential for the transportation network improvements in the plan to directly or indirectly expose people or structures to potential substantial adverse impacts, including the risk of loss, injury, or death through the rupture of a known earthquake fault, strong seismic shaking, seismic-related ground failure, soil liquefaction, or landslides. This particular discussion is focused on known faults, which is the reason that the seismic zones are emphasized.

The Draft EIR also provides an analysis of the potential for transportation improvements to be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, liquefaction, or collapse in Impact 3.6-3. On page 3.6-30, the analysis notes:

The planned transportation improvements would be located on a range of different geologic materials and conditions. Hazards associated with unstable soils or geologic units are dependent on site- specific conditions, as well as the specific nature of the individual projects proposed. With adherence to grading permit and building code requirements, including seismic design criteria as required by the CBC, Caltrans, Special Publication 117A, and local building code requirements, all improvements associated with planned transportation improvements would be designed to minimize potential risks related to unstable soils and

geologic units. Because transportation improvements are subject to state and local requirements for geotechnical stability that specify mandatory and relatively prescriptive actions that must occur during project development, the potential for landslide, lateral spreading, subsidence, liquefaction, or collapse impacts related to transportation improvements is not substantial.

Therefore, while the lack of mapped seismic hazard zones with the potential to result in liquefaction is acknowledged in the Draft EIR, the potential for liquefaction at any particular project site would be determined by the specific site conditions and the best data available at the time, as required by established regulations. No revisions have been made to the Draft EIR in response to this comment.

Comment A1-2

- ▶ SACOG should consider providing a map of the current CGS Earthquake Zones of Required Investigation (EZRI) for liquefaction, which can be accessed at the links below. CGS maps and data are available here and should be used in the suggested map:

<https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismichazards-program-liquefaction-zones-1/about>

<https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismichazards-program-landslide-zones-doc-hosted/about>

<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>

<https://maps.conservation.ca.gov/EQZApp/app/>

- ▶ Cities and counties affected by EZRIs must regulate certain development projects within them. The Seismic Hazards Mapping Act (1990) also requires sellers of real property (and their agents) within a mapped hazard zone to disclose at the time of sale that the property lies within such a zone.

Response A1-2

After consideration, SACOG has determined that a map of CGS Earthquake Zones of Required Investigation (EZRI) would not inform the discussion in the Draft EIR because there are no EZRI zones mapped in the plan area. If the EZRI are modified in the future to include any zones mapped in the plan area, the resulting impacts and regulatory compliance requirements will be evaluated in the next plan cycle (which occurs every 4 years) and at the project level. No revisions have been made to the Draft EIR in response to this comment.

Comment A1-3

2. Earthquake Ground Motion Hazards

- ▶ The DEIR should provide a discussion of the probability of large earthquakes in the region. This discussion may include earthquake probabilities from the third Uniform California Earthquake Rupture Forecast (UCERF3). A non-technical discussion of this model is available here: <https://pubs.usgs.gov/fs/2015/3009/pdf/fs2015-3009.pdf>

Response A1-3

The comment requests a discussion of earthquake probability in the region and references a model that forecasts the potential for earthquake fault rupture. The potential for earthquake fault rupture and probability of ground motion are connected but distinct. Although the highest hazard areas are near major active faults, damaging earthquake shaking is possible anywhere in California. Factors such as proximity to faults and local geologic conditions influence shaking intensity. For example, sedimentary basins generally experience amplified shaking (California Geological Survey 2025).

Furthermore, the Draft EIR does discuss the probability of large earthquakes in the region. Faults and fault rupture are described on page 3.6-16 of the Draft EIR and shown in Figure 3.6-6 (page 3.6-19) of the Draft EIR. The Draft EIR includes a discussion of ground shaking on pages 3.6-16 and 3.6-21. A map of ground shaking hazards in the plan area is provided on page 3.6-23 (Figure 3.6-7). The figure in the Draft EIR is based on Map Sheet 48 prepared by the California Geological Survey. This map depicts expected ground shaking intensity from future earthquakes across the

state. The map shows the level of shaking with a 2 percent probability of being exceeded in 50 years, equivalent to a 2,475-year average recurrence interval.

As explained on page 3.6-21 of the Draft EIR:

Overall, the plan area is located in an area of low earthquake hazard and experiences low levels of ground shaking on an infrequent basis (DOC 2025b).

Therefore, the Draft EIR discloses both the potential for earthquake fault rupture and the probability of large earthquakes in the region. No revisions have been made to the Draft EIR in response to this comment.

Comment A1-4

3. Naturally Occurring Asbestos Hazards

- ▶ The DEIR provides a discussion of naturally occurring asbestos (NOA) hazards on page 3.3-22 and references maps prepared by others depicting areas of NOA in the project area. CGS notes we have also prepared county-level reports on the likelihood of NOA for El Dorado, Placer, and Sacramento Counties. The map depicting "Reported Historic Asbestos Mines" referenced in the DEIR is incorrectly attributed to the USGS; it was compiled, prepared, and published by the CGS as Map Sheet 59. The DEIR should update Figure 3.3-3 to include the areas depicted in the additional CGS Special Reports linked below. Additional information and map files can be found at the following link: <https://www.conservation.ca.gov/cgs/minerals/mineral-hazards/asbestos>.

Response A1-4

In response to this comment, the text of the second paragraph on page 3.2-22 of the Draft EIR has been revised to correctly attribute the map of historic asbestos mines and other natural occurrences to the California Geological Survey and reference the county-specific maps that have been prepared. The change does not affect the analysis or conclusions provided in the Draft EIR.

SACOG used the map of serpentine soils for the purpose of describing the potential for asbestos soils in the six-county SACOG region. This map provides a reasonable representation of the potential for NOA in the region, based upon readily available geographic data files. The county-specific asbestos hazard data available at the link provided in the comment is not available for the whole SACOG region and would require mapping interpretation to translate to a figure for the EIR. Therefore, SACOG has determined that Figure 3.3-3 provides the best available regional data and a reasonable representation of the potential for NOA given the scale of the plan area. No revisions have been made to Figure 3.3-3 in response to this comment.

Letter A2 Delta Stewardship Council

Jeff Henderson, Deputy Executive Officer
July 24, 2025

Comment A2-1

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the Sacramento Area Council of Governments' (SACOG) Draft 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy (2025 Blueprint). The Delta Stewardship Council (Council) recognizes the objectives of the 2025 Blueprint, as described in the 2025 Blueprint and Draft EIR, to achieve various federal, state, regional, and local policy objectives related to sustainable development, transportation, and greenhouse gas emission reduction while considering financial, growth, and regulatory constraints. This letter summarizes the requirements of the Sacramento-San Joaquin Delta Reform Act of 2009 (Wat. Code, § 85000 et seq.; Delta Reform Act) pertaining to the 2025 Blueprint and provides the Council's comments on the 2025 Blueprint and Draft EIR.

The Council is an independent state agency established by the Delta Reform Act, charged with furthering California's coequal goals of providing a more reliable water supply and protecting, restoring, and enhancing the Sacramento-San Joaquin River Delta (Delta) ecosystem. (Wat. Code, § 85054.) The Delta Reform Act further states that the coequal goals are to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (Wat. Code, § 85054.) The Council is charged with furthering

California's coequal goals for the Delta through the adoption and implementation of the Delta Plan. (Wat. Code, § 85300.)

SACOG's 2025 Blueprint is a regional transportation plan for a six-county region that includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties and the 28 cities in these counties. Portions of Sacramento and Yolo Counties include land within the Delta.

Delta Reform Act Requirements for Regional Transportation Plans and Sustainable Communities Strategies

The Delta Reform Act requires metropolitan planning organizations (MPOs) to consult with the Council when preparing a sustainable communities strategy (SCS) that includes land within the primary or secondary zones of the Delta. (Wat. Code § 85212.) Council staff and SACOG staff met for this purpose on March 4, 2025, and April 4, 2025.

The Delta Reform Act also requires SACOG provide a draft SCS to the Council no later than 60 days prior to the adoption of the final metropolitan transportation plan. (Wat. Code § 85212.) SACOG submitted its 2025 Blueprint to Council staff on June 6, 2025.

Council Review and Input on the Draft EIR and the 2025 Blueprint

This section summarizes Council staff's review of and input on the Draft EIR for the 2025 Blueprint. It also summarizes Council staff's comments on the Draft EIR.

1. Consistency with Ecosystem Restoration Needs and Sufficiency of Lands Set Aside

Water Code section 85212 requires that the Council's input on local and regional planning documents, including a SCS, include, but not be limited to, reviewing both of the following:

- ▶ the consistency of local and regional planning documents with the ecosystem restoration needs of the Delta.
- ▶ whether the land set aside for natural resource protection is sufficient to meet the Delta ecosystem needs.

a. Consistency with Restoration Needs

The Delta Plan designates six priority habitat restoration areas (PHRAs) that have the greatest potential for large-scale habitat restoration (Delta Plan, Chapter 4, p. 4- 47 to 4-50). Delta Plan Policy **ER P3** (Cal. Code Regs., tit. 23, § 5007.) states that significant adverse impacts to the opportunity to restore habitat must be avoided or mitigated in these PHRAs (depicted in Appendix 5: <http://deltacouncil.ca.gov/sites/default/files/2015/09/Appendix%205.pdf>).

Two PHRAs are located within the SACOG region: the Yolo Bypass, which passes through Yolo County; and the Cosumnes/Mokelumne confluence located at the southern edge of Sacramento County. In its March 4, 2025, comments on the Notice of Preparation (NOP) for the Draft EIR, Council staff requested that the Draft EIR describe the planned land uses identified in these areas and describe how significant adverse impacts to the opportunity to restore habitat in these locations would be avoided or mitigated. The Draft EIR identifies that growth projected within the Delta in the 2025 Blueprint is located in areas designated as Developing Communities located between, and adjacent to, areas designated as Established Communities in the City of West Sacramento and is consistent with Yolo County's adopted General Plan Land Use Diagram. The Draft EIR further states that none of this future development is anticipated to occur in the PHRAs (Draft EIR p. 3.10-23)

Finding: Based on the review of the 2025 Blueprint and Draft EIR, in compliance with Water Code section 85212, Council staff has not identified any inconsistency in the Draft EIR of the 2025 Blueprint with Delta Plan policy **ER P3**.

b. Sufficiency of Lands Set Aside

The 2025 Blueprint does not specifically address setting aside lands for natural resource protection. SACOG notes that this is the prerogative of lead agencies that adopt land use plans and implement projects, such as city and county agencies, transit providers, land developers. However, the 2025 Blueprint incentivizes natural resource protection by encouraging growth in existing population centers and by maximizing the efficiency of the existing transportation network. Council staff recognizes SACOG is continuing the principles established in previous cycles of the metropolitan transportation plan/sustainable communities strategy (MTP/SCS) that encourage compact, mixed-use development; a variety of housing types and transportation modes; quality design; and natural resource

conservation. The 2025 Blueprint aims to continue to accommodate approximately two-thirds of the region's new housing and the majority of its job growth in existing downtowns, commercial corridors, and suburbs. The remaining housing and job growth is accommodated within more than two dozen areas designated as Developing Communities to support robust job growth outside of the traditional job centers of the region by planning jobs, housing, and public transportation in clusters.

Senate Bill (SB) 375 (Stats. 2008, ch. 728.) provides California Environmental Quality Act (CEQA) streamlining benefits for certain projects that are consistent with the MTP/SCS land use and transportation pattern. The 2025 Blueprint and Draft EIR aim to facilitate these CEQA streamlining benefits for qualifying residential, mixed-use, and transit priority projects that are consistent with the general use designation, density, building intensity, and applicable policies specified in the 2025 Blueprint (Draft EIR 2-46, 2025 Blueprint examples pg. 30. 58). The 2025 Blueprint Appendix E map and figure illustrate the location of the High Frequency Transit and amount of Housing and Employment within High-Frequency Transit Areas, 2020-2050 (Fig. 2-7 and Fig. 2-8). Based on the mapped locations, the 2025 Blueprint would not provide CEQA streamlining benefits to projects outside of existing city boundaries, within the Delta, or within any PHRA. Based on the locations of the High Frequency Transit areas, the 2025 Blueprint is not likely to incentivize development in areas within the Delta that are necessary to meet the Delta's ecosystem needs.

Finding: Based on review of the 2025 Blueprint and the Draft EIR, and in compliance with the Water Code section 85212, Council staff has not identified any inconsistency of the 2025 Blueprint with Delta Plan policy **ER P3**.

2. Consistency with the Delta Plan

The Delta Reform Act requires the Council to review and provide timely advice to planning agencies regarding the consistency of local and regional planning documents, including a SCS, with the Delta Plan. (Wat. Code § 85212.)

a. Land Use Pattern

Delta Plan Policy **DP P1** (Cal. Code Regs., tit. 23, § 5010.) places certain limits on new urban development within the Delta. New residential, commercial, and industrial development must be limited to areas that city or county general plans designate for that development as of the date of the Delta Plan's adoption of May 16, 2013. This policy is intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk.

A state or local agency that proposes to carry out, approve, or fund an action that occurs in whole or in part in the Delta (covered action) is required to prepare a written Certification of Consistency with detailed findings as to whether the covered action is consistent with the Delta Plan and submit that certification to the Council prior to implementation of the project. (Wat. Code § 85225.) The Delta Reform Act exempts from this requirement actions within the Secondary Zone of the Delta that a MPO determines are consistent with its SCS and that the State Air Resources Board has determined would achieve regional greenhouse gas emission reduction targets. (Wat. Code § 85057.5, subd. (b)(4).) SACOG is the MPO for the Sacramento region, which contains portions of the Secondary Zone of the Delta. Thus, Water Code section 85057.5, subdivision (b)(4), provides SACOG with a role in shaping the State's Delta policy.

Council staff's NOP comment letter dated March 4, 2025, requested the Draft EIR analyze whether the 2025 Blueprint would include new urban development within the Delta. The Draft EIR acknowledges consistency with policy **DP P1** in the regulatory setting of the Land Use and Planning Section (3.10) as well as the Aesthetics Section (3.1). Regional growth anticipated within or adjacent to the Delta would limit residential, commercial, or industrial development to areas that city or county general plans designate for that type of development.

The Draft EIR states "the majority of development under the 2025 Blueprint would occur as infill development in Center and Corridor Communities and Established Communities, in accordance with the adopted land use plans and zoning ordinances of the cities or counties in the plan area." And further, "[t]he Developing Communities are located between and adjacent to Established Communities in the City of West Sacramento and are consistent with the County's adopted General Plan Land Use Diagram."

Finding: Based on the review of the 2025 Blueprint and Draft EIR, in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the 2025 Blueprint with Delta Plan policy **DP P1**.

b. Transportation Investment

The recommended transportation projects in the 2025 Blueprint include investments in both rural and urban areas located within the Delta. These transportation projects would advance Delta Plan recommendation **DP R11**, to protect and improve existing recreation opportunities while seeking ways of providing new and better coordinated opportunities. The 2025 Blueprint includes projects within the Delta that support recreation, such as proposed new and improved bicycle and pedestrian routes connecting West Sacramento and Clarksburg and a trail system connecting all six counties (Draft 2025 Blueprint, Appendix A).

The Delta Plan also recommends providing adequate infrastructure in the Delta. Recommendation **DP R5** states "The California Department of Transportation, local agencies, and utilities should plan infrastructure, such as roads and highways, to meet needs of development consistent with sustainable community strategies, local plans, the Delta Protection Commission's Land Use and Resource Management Plan for the Primary Zone of the Delta, and the Delta Plan." A number of planned transportation investments in the 2025 Blueprint would improve the capacity and safety of roads and highways in the Delta. The 2025 Blueprint also includes multiple projects to restore pavement and redesign streetscapes to be more pedestrian and bike friendly. Roadway improvement projects in the Delta described in the 2025 Blueprint and Draft EIR would improve agricultural and goods movement travel and improve accessibility for slow-moving farm equipment.

Finding: Based on a review of the 2025 Blueprint and Draft EIR, in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the recommended transportation projects identified in the 2025 Blueprint with Delta Plan recommendations concerning transportation in the Delta.

CLOSING COMMENTS

Pursuant to Water Code section 85212, Council staff has reviewed and provided advice and input on the Draft EIR and 2025 Blueprint as outlined in this letter. Council staff has not identified any inconsistency with the Delta Plan. Council staff finds that the two plans are complementary in nature, serving to protect the Delta while promoting sustainable growth and economic vitality in the broader region. Council staff invites SACOG to continue to engage Council staff following the adoption of the 2025 Blueprint to coordinate implementation and subsequent plan updates. Please contact Eva Bush at (916) 284-1619 or Eva.Bush@deltacouncil.ca.gov with any questions.

Response A2-1

The comment details the 2025 Blueprint's consistency with the Delta Plan. The comment does not raise a specific issue related to the Draft EIR or the analysis of environmental impacts as contemplated by CEQA (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088[c], 15204[a]). This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A2-2

Deletions are in ~~striketrough~~, additions in underline.

Pg 3.2-5 Under heading: Delta Reform Act

The Delta ~~Protection~~ Plan, which was enacted by the Delta Stewardship Council, identifies agriculture as the principal land use in the Delta, but indicates that in recent decades the total area of agricultural lands has declined, as has the overall percentage of lands in agricultural use. The Delta ~~Protection~~ Plan states that the continued viability of agriculture in the Delta will require the protection of sufficient farmland and fresh water to support commercially viable operations and provide ways for agriculture to co-exist with habitat restoration.

Pg 3.4-5 Under heading: Sacramento-San Joaquin Delta Reform Act

In November 2009, the California Legislature enacted the Sacramento-San Joaquin Delta Reform Act of 2009 (Delta Reform Act) (California Water Code Section ~~10640~~ 85000 et seq.), also known as SB 1 (Stats. 2009, 7th Ex. Sess., ch. 5) (SB X7-1), one of several bills passed at that time related to water supply reliability, ecosystem health, and the Delta.

Pg. 3.4-6 Sacramento San Joaquin Delta Reform Act of 2009

The Delta Reform Act expressly provides that “covered actions” do not include the following: (1) regional transportation plans (RTPs), such as this proposed 2025 Blueprint; and (2) plans, programs, projects, activities (and any infrastructure necessary to support those plans, programs, projects, or activities) within the secondary zone of the Delta that SACOG has determined is consistent with the proposed 2025 Blueprint (California Water Code Section 85057.5). However, the ~~DSC reviews any plan that includes land within the Delta zones, whether or not it is a covered action.~~ Delta Reform Act directs the Council to review and provide timely advice to local and regional planning agencies regarding the consistency of local and regional planning documents, including sustainable communities strategies (SCS) with the Delta Plan (Wat. Code section 85212.) Metropolitan planning organizations that have a planning area crossing these boundaries are required to follow a this consultation procedure with the DSC. This procedure includes early coordination to determine consistency of a proposed ~~RTP~~ SCS with the Delta Plan.

Pg. 3.10-4 Sacramento San Joaquin Delta Reform Act of 2009

The Delta Plan’s 44 15 regulatory policies ~~were approved by the Office of Administrative Law and became effective with are~~ legally enforceable regulations set forth in California Code of Regulations, title 23, sections 5001 et seq. ~~on September 1, 2013.~~

Pg. 3.15-15

The ~~2009~~ Delta Reform Act (~~Public Resources~~ Wat. Code section ~~29759-85000~~ 85000 et. seq.) requires the DPC to prepare an economic sustainability plan (ESP) for the Delta region.

Response A2-2

The suggested edits identified in the comment have been incorporated into the Draft EIR, as shown in Chapter 4, “Revisions to the Draft EIR.” These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Letter A3 Feather River Air Quality Management District

Sondra Spaethe, Planning and Engineering Supervisor
August 5, 2025

Comment A3-1

The Feather River Air Quality Management District would like to provide the following updates on Air Quality Plans in Table 3.3-3 on page 3.3-11.

1. Under Ozone CAAQS, the reference to the 2012 Triennial Plan is outdated. The FRAQMD has adopted a 2024 Ozone Plan <https://www.fraqmd.org/california-air-quality-plans> on December 2, 2024.
2. Under PM2.5 NAAQS, the FRAQMD has adopted the Yuba City-Marysville PM2.5 Second Maintenance Plan on April 3, 2023 <https://www.fraqmd.org/federal-air-quality-plans>.

Response A3-1

The text within Table 3.3-3 beginning on page 3.3-11 of the Draft EIR has been updated with the most current information regarding Feather River Air Quality Management District’s ozone and fine particulate matter (PM_{2.5}) air quality plans, as shown in Chapter 4, “Revisions to the Draft EIR.” These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Letter A4 Central Valley Regional Water Quality Control Board

Peter G. Minkel, Engineering Geologist

August 5, 2025

Comment A4-1

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website: http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage

under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

Response A4-1

The comment compiles regulations that would apply to projects that occur in the plan area. As appropriate, these regulations are acknowledged in the Draft EIR in Section 3.9, “Hydrology and Water Quality.”

The comment does not raise a specific issue related to the Draft EIR or the analysis of environmental impacts as contemplated by CEQA (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088[c], 15204[a]). This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter A5 California Department of Transportation, District 3

Sukhvinder (Sue) Takhar, Deputy District Director – Planning, Local Assistance, and Sustainability
August 7, 2025

Comment A5-1

Environmental Impact Report (EIR):

- ▶ **Throughout the EIR:** consider mentioning truck parking, discussing intermodal connections, equity considerations related to goods movement, referencing resilience or sustainability regarding goods movement, and including safety in relation to freight.

Response A5-1

The Draft EIR discloses the environmental effects of the 2025 Blueprint, which considers goods movement. Section 2.5.2 of the Draft EIR summarizes the strategic priorities of the 2025 Blueprint, including a strategy to support the next generation of mobility to make it easier, safer, and cleaner for everyone to move through the region, especially low-income and historically marginalized communities. Specifically, Policy NextGen-3 considers the importance of equity and transitioning to zero-emission vehicles, including for freight vehicles.

Goods movement is also described on page 3.16-23 of the Draft EIR, including intermodal connections of passenger vehicles used for goods movement, rail transport, air freight, and maritime ports. Table 3.16-1 provides mode share by tonnage of goods transported in the region and breaks down the movement of goods by mode. The regional plan does not evaluate specific truck parking sites, which are outside the scope of the plan. The Draft EIR identifies truck routes and terminal access points, as shown on Figure 3.16-5, "Goods Movement Routes in Plan Area." Safety is considered as a performance measure for all modes, including goods movement; see page 3.16-32 of the Draft EIR.

Comment A5-2

- ▶ **Page 3 (23 of the PDF):** The last paragraph of Section ES.3 currently states that a more detailed description of each alternative is provided in "Chapter 5, 'Alternatives,'" However, it appears that this information is in Chapter 4. Please update the reference accordingly.

Response A5-2

The cross reference to Chapter 4 has been updated as suggested in the comment. See Chapter 4, "Revisions to the Draft EIR," of this Final EIR. These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-3

- ▶ **Page 3.7-6 and 3.7-7:** Caltrans commends SACOG for your commitment to California Emissions Goals.

Response A5-3

The comment references the summary of existing state regulations and expresses support for SACOG's commitment to California Emissions Goals. The comment does not raise a specific issue related to the Draft EIR or the analysis of environmental impacts as contemplated by CEQA (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088[c], 15204[a]). This comment is acknowledged for the record.

Comment A5-4

- ▶ **Page 3.16-8:** in the "Freeways and Highways" section, consider adding SR 51 (I- 80 Business Loop).

Response A5-4

The text describing the major freeways and highways within the plan area on page 3.16-8 of the Draft EIR has been modified to add State Route 51 (Business Loop 80) on page 3.16-8 to recognize its role as a major highway in the plan area. See Chapter 4, "Revisions to the Draft EIR," of this Final EIR. These text modifications provide clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-5

- ▶ **Page 3.16-11:** The second paragraph in the "Local Streets" section indicates Table 3.16-1 provides a tabulation of roadway classes by route miles and lane miles for the SACOG region. However, Table 3.16-1 does not appear until page 3.16-23 and discusses goods movement. Please adjust accordingly.

Response A5-5

The table reference has been updated to direct readers to Table 3.16-9, as shown in Chapter 4, "Revisions to the Draft EIR." These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-6

- ▶ **Page 3.16-16:** the first paragraph of the "Bicycles" section states that Figure 3.16-3 shows cross sections of each type of bicycle facility, but Figure 3.16-3 is a map of bicycle facilities in the SACOG region.

Response A5-6

The text has been updated to remove the reference to a figure with cross sections, as shown in Chapter 4, "Revisions to the Draft EIR." These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-7

- ▶ **Page 3.16-23:** it says, "For goods originating or destined for the region, but with the other end of trip outside the region, 27 percent of the tonnage is carried by trucks..." Table 3.16-1 does not accurately reflect the 27 percent stated. Please revise the table.

Response A5-7

The text has been updated to clarify the text and update the referenced percentage, as shown in Chapter 4, "Revisions to the Draft EIR." These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-8

- ▶ **Page 3.16-23:** please verify the numbers referenced in the following statement are the most current data available, "The number of daily freight deliveries per person in the United States has increased from about 0.12 in 2009 to 0.25 in 2018 (TIME 2018)."

Response A5-8

Additional text has been added to discuss changes in daily freight services since 2018 following the second to last sentence on page 3.16-23 of the Draft EIR, as shown in Chapter 4, "Revisions to the Draft EIR." These text modifications provide clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-9

- ▶ **Pages 3.16-38 to 3.16-39:** for Table 3.16-9, please adjust the font in the 2022 Lane-Miles of High Occupancy Vehicles (HOV)/ High Occupancy Toll (HOT) Lane and Auxiliary Lanes/Ramps. Please consider coordinating with Caltrans on these numbers to enter these values in the table.

Response A5-9

The “4” to the right of the “n/a” in the “2022” column for rows “HOV/HOT Lane²” and “Auxiliary Lanes/Ramps²” has been corrected to superscript text. See Chapter 4, “Revisions to the Draft EIR.” These text modifications clarify the table contents. The changes do not affect the analysis or conclusions provided in the Draft EIR.

As provided in the footnotes to Table 3.16-9, HOV/HOT lanes, auxiliary lanes and ramps are located within other freeway routes, they do not generate route mileage, only lane mileage, and the table as presented in the Draft EIR provides sufficient data about the change in roadway route and lane miles to support the conclusions in the Draft EIR. No further changes have been made to the Draft EIR in response to this comment.

Comment A5-10

- ▶ **Page ES-56, EIR Checklist Impact 3.5-1:** Cultural Resources, cause a Substantial Change in the Significance of a Historical Resource. Under CEQA a Historical Resource is a site, feature, structure, etc. that is eligible for the California Register of Historical Resources. The mitigation measures only discuss built environment. This needs to be updated to discuss all types of historical resources. These resources can also include Unique Archaeological Resources discussed in the next section.

Response A5-10

The second paragraph of Section 3.5, “Cultural Resources,” in the Draft EIR defines historical resources (or built environment) as including standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts), or landscapes. Additionally, as stated on page 3.5-25, “for the purposes of the impact discussion, ‘historical resource’ is used to describe built-environment historic-period resources.” Other historical resources are addressed and mitigated in Impact 3.5-2, “Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources.” Therefore, the Draft EIR analyzes and mitigates impacts to all types of historic resources described at State CEQA Guidelines section 15064.5, subdivision (a), as required by CEQA. No changes have been made to the Draft EIR in response to this comment.

Comment A5-11

- ▶ **Pages ES-56 to 61:** please note for all sections in the checklist that completing studies is not mitigation. Measures should be labeled “mitigation measures” only if they are to reduce impacts determined to be significant.
- ▶ **Page ES-59:** “mitigation is for an adverse effect to an eligible resource”. This is not mitigation. If no archeological resources are identified in the Archeological Survey Report that may be directly or indirectly impacted by project activities, mitigation is complete as there would be no adverse change to documented archeological resources.

Response A5-11

The comment appears to reference the cultural resources mitigation measures, as presented in Table ES-1 (“Summary of Impacts and Mitigation Measures”). As noted in the comment, these mitigation measures require the completion of surveys to determine the potential for project-level impact. This mitigation approach is the result of the potential for impacts to cultural resources at the plan level and reflects the range of potential activities that could occur with plan implementation, as well as the range of geographies in the plan area. The completion of studies is a necessary and appropriate component of a mitigation measure that would be implemented at the project level. Although future studies are included as mitigation for historical and archaeological resources, these studies are the first necessary step in identifying significant resources. Recommended treatment for significant historical resources or archaeological resources would be identified in the relevant reports.

The text in quotation marks is unclear, as it does not appear on page ES-59 of the Draft EIR or elsewhere in the Executive Summary. Mitigation Measure 3.5-2 does state that the requirements of the measure would be fulfilled if no archaeological resources are identified that would be impacted—based on a project-specific records search and site survey (if warranted). Additionally, Mitigation Measures 3.5-1 and 3.5-2 include the avoidance of resources or adherence to the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings or Historic Landscapes for historical resources or preservation in place for archaeological resources. Mitigation Measures 3.5-1 and 3.5-2 also include the preparation of Historic American Buildings Survey, Historic American Engineering Record, and Historic American

Landscapes Survey programs to formally document historical resources and data recovery for archaeological resources. Furthermore, the Draft EIR recognizes the limitations of these studies as mitigation measures insofar as the Draft EIR concludes that the 2025 Blueprint would cause a substantial adverse change in the significance of a historical resource and cause a substantial adverse change in the significance of unique archaeological resources, even after the implementation of the mitigation measures.

As an informational document, the Draft EIR provides a complete and good-faith effort to disclose the potential for effects and the steps that should be taken by implementing agencies to reduce their severity. Here, the inclusion of surveys as an initial mitigation step is appropriate and necessary because (1) it is entirely impractical to survey a six-county region to inform the mitigation for this EIR, (2) surveys may otherwise not occur at the project level, and (3) the mitigation provides clear and relatively prescriptive steps to follow based on the survey results.

As described in Section 15126.4(a)(1)(B) of the State CEQA Guidelines, the specific details of mitigation:

may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

The mitigation included in the Draft EIR is consistent with these requirements. No revisions have been made to the Draft EIR in response to this comment.

Comment A5-12

- **Page ES-61:** Cultural Impact 3.5-3 Disturb Human Remains - It is unclear why mitigation is not required because the California Health and Safety Code does not deal with significance. Burial sites are often the important resource encounter and are commonly considered Historical Resources and Unique Archaeological Resources.

Response A5-12

Compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097 is the standard, accepted approach for the unanticipated discovery of human remains. These regulations provide an opportunity to appropriately treat any remains that are discovered, including following Native American Heritage Commission guidelines and coordinating with the identified Tribe's most likely descendant. Additionally, the discovery of Native American human remains is addressed in Mitigation Measure 3.17-2, "Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources and Evaluate Discovered Resource." No revisions have been made to the Draft EIR in response to this comment.

Comment A5-13

- **PDF Page 400, Transportation Operations:** "At the time of the analysis trip information was not available." This statement conflicts with Section 3.16 VMT bullet points that VMT is one of the "few measures of transportation performance that has been consistently and comprehensively monitored and documented over time in the plan area." Additionally, trip information is inherent to the transportation modeling inputs for conformity and the blueprint plan forecasting. Please explain why trip information is not available.

Response A5-13

The comment references the description of the methodology applied to the calculation of transportation-related emissions in Section 3.7, "Greenhouse Gas Emissions and Energy," on page 3.7-15 of the Draft EIR. The statement that trip information was not available at the time of the writing of the Draft EIR was made in error and has been removed. Note that the methodology section also explains:

Mobile emissions for each county were calculated based on VMT and emission factors from CARB's EMFAC2021 emissions inventory model and then consolidated to represent the total mobile emissions for the

entire plan area. Annual emissions from the six counties in the plan area were generated by EMFAC for the years 2020 and 2050. The emission estimates incorporate road-based, trip-based, and evaporative emissions to derive a VMT-based emission factor.

Impact 3.7-1, beginning on page 3.7-16 of the Draft EIR, also explains the approach to the conformity analysis and Blueprint forecasting. Carbon dioxide emissions are reported for passenger vehicle and light-duty truck vehicle miles traveled (VMT) from SACSIM23, with emissions directly generated from EMFAC11. The resultant greenhouse gas (GHG) emissions reduction forecast does not include any additional measures from the 2022 Scoping Plan. The text further explains the approach, and Table 3.7-3 provides a breakdown of the policy and exogenous factors anticipated to result in reduced GHG emissions from the mobile sector. Trip modeling to achieve the 2030 reduction target of SB 32 is explained further in Impact 3.7-2, on page 3.7-19 of the Draft EIR. As explained therein, “[m]obile source emissions reflect the VMT modeled under the plan.”

See Chapter 4, “Revisions to the Draft EIR,” for the revised methodology text. These revisions have been made for internal document consistency. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-14

- **PDF Pages 401 and 502:** Heading “issues not discussed further” and sentence following should be deleted if there are no issues discussed further. Apply throughout the Blueprint document.

Response A5-14

The comment suggests the removal of a standard heading (“Issues Not Discussed Further”) from Section 3.7, “Greenhouse Gas Emissions and Energy,” and Section 3.10, “Land Use and Planning.” In both of these sections, all of the topics identified in the significance criteria are addressed in the analysis that follows. Nonetheless, SACOG has retained the headings for document consistency. Because the comment provides no indication that this approach to the document outline substantially impairs the public’s understanding of the analysis or conclusions in the Draft EIR, no changes have been made in response to this comment.

Comment A5-15

- **PDF Page 402:** replace “non-single-occupancy” with multiple-occupant. Apply throughout the Blueprint document.

Response A5-15

The term “non-single-occupancy” is used twice in the Draft EIR (page 3.7-17) and is not used in the 2025 Blueprint. The suggested terminology change is acknowledged. However, SACOG has elected to retain the original terminology, which adequately describes the condition and is a term used in the context of modeling and calculations. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment.

Comment A5-16

- **PDF Page 503:** replace “road pricing improvements” with road pricing projects.

Response A5-16

The term “improvements” has been replaced with “projects,” as suggested in the comment. See Chapter 4, “Revisions to the Draft EIR.” These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-17

- **PDF Page 604:** replace “... but they are proposed for future implementation.” with however, they are anticipated to be operational within the Plan transportation forecast period.

Response A5-17

Clarifying text has been added to the last sentence in the first bulleted paragraph under the “Freeways and Highways” heading on page 3.16-7 of the Draft EIR, as shown in Chapter 4, “Revisions to the Draft EIR.” These text modifications

provide clarification to the descriptions of the existing setting and do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-18

- ▶ **PDF Pages 604-605:** please update the route descriptions to clearly indicate which routes currently have HOV lanes and any routes that are planned to have HOV/HOT lanes added during the forecast period.

Response A5-18

Clarifying text has been added to the list of major freeways and highways on pages 3.16-7 and 3.16-8 of the Draft EIR to note existing high-occupancy vehicle (HOV) lanes and planned HOV/high-occupancy toll (HOT) lanes during the plan implementation period, as shown in Chapter 4, "Revisions to the Draft EIR." These text modifications provide clarification to the descriptions of the existing setting and do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-19

- ▶ **PDF Page 607:** Transit System discussion: Section 2.2 discusses Bus Rapid Transit, which is not discussed under the Transit/Roadway Systems section. Consider integrating this discussion directly into the Transit/Roadway system or include a "See Also ## comment".

Response A5-19

The comment references the description of existing transit services on pages 3.16-11 through 3.16-16 of the Draft EIR. Bus Rapid Transit is not a service currently provided in the region. Section 2.2 discusses the future implementation of Bus Rapid Transit. Therefore, the discussions are consistent with the existing and planned transit systems, respectively, and no changes have been made in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-20

- ▶ **PDF Page 616:** "In response to growing demand and faster delivery times, delivery vehicle options have expanded to include passenger cars and experimentation with drones and small robot vehicles operating on sidewalks". Is this occurring within the SACOG area?

Response A5-20

The comment references the description of new delivery vehicle options mentioned in relationship to national freight delivery trends, which is intended to highlight the rapid changes occurring that effect freight delivery. The statement is accurate and appropriate in this context. Passenger car delivery is occurring within the SACOG region. Drone and robot deliveries have been piloted within the region or nearby. Therefore, no changes have been made in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-21

- ▶ **PDF Page 617:** Passenger Vehicles Used for Goods Movement, end of last sentence: "...and/or lower fuel prices." Please clarify how fuel prices are lower.

Response A5-21

The last sentence in the "Passenger Vehicles Used for Goods Movement" discussion lists factors other than increased use of passenger vehicles for last-mile freight deliveries that could contribute to the statewide increase in VMT observed since 2011. Tourism rates, the proportion of licensed drivers, and gas prices are provided as examples. The sentence is not referencing that fuel prices are currently lower but that when fuel prices drop, the price change may influence travel behavior leading to increased travel and VMT as gas-powered travel becomes cheaper. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-22

- **PDF Page 619:** In the second bullet point regarding Vehicle Miles Traveled (VMT), please specify the monitoring methods and identify which transportation systems these methods are applied to. Since vehicle occupancy is probably not widely monitored, consider removing or rephrasing this statement to clarify its relevance to impact analysis.

Response A5-22

The comment references the description of transportation performance measures included in Section 3.16.2, "Environmental Setting," of the Draft EIR. As described therein, the discussion "includes historical context on travel trends in the plan area related to VMT," and additional details are included in the impact analysis section (Draft EIR page 3.16-27). The discussion includes three bullet points supporting the efficacy of using typical weekday VMT as the measurement of transportation in the Draft EIR. The second bullet reads:

- VMT bears a strong and direct relationship to vehicle emissions, although this relationship is becoming more complex as vehicular technologies evolve. State and federal policies pertaining to vehicle efficiency and formulation of vehicle fuels suggest that on a per VMT basis, emissions for most pollutants and GHGs will decline relative to today. However, even with these per VMT improvements due to fuel and vehicle technology changes, lower VMT will mean lower emissions.

The comment requesting the specification of monitoring methods is unclear in this context.

The third bullet states, in part, "VMT can be influenced by policy in a number of different ways. By providing more attractive alternatives to driving alone, VMT can be reduced by shifting from vehicle to non-vehicle modes (i.e., from a car trip to a bike or walk trip), or from low occupancy to HOVs (i.e., from a single-occupant vehicle trip to a carpool or transit trip)" (Draft EIR page 3.16-27). These characteristics of VMT are well established (see, for example, the California Air Pollution Control Officers Association's December 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*). Because the purpose of this discussion is to describe VMT as a metric, it is not necessary or appropriate to address project impacts in this description. See Impact 3.16-2, "Result in a Change in per Capita VMT that is Inconsistent with CARB's 2022 Scoping Plan" (Draft EIR pages 3.16-39 to 3.16-46) for a discussion of the body of research and knowledge on the relationship between characteristics of land use and travel behavior used to inform the 2025 Blueprint, the forecast changes in key land use and transportation indicators understood to reduce VMT, and the strategies in the 2025 Blueprint to reduce VMT. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-23

- **PDF Page 635:** Table 3.16-12: Table is "by County." Population change should be reflected for each County, and remove Region, (region) population, and (region) VMT per Capita rows.

Response A5-23

The comment suggests removing regional population and VMT metrics in Table 3.16-12 on page 3.16-43 of the Draft EIR. The 2025 Blueprint is a plan for the SACOG region. Although the VMT by county is provided for reference in the table, the Draft EIR performance metric is evaluated for the region and is therefore appropriate to include. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-24

- **PDF Page 636:** First paragraph "Overall, this group..." Specify which group is this referring to? Is this in reference to the new residents in 2050? Please clarify this statement.

Response A5-24

The phrase "this group" has been replaced with "new residents" to clarify the connection with the prior sentence. See Chapter 4, "Revisions to the Draft EIR." These text modifications provide technical edits and clarification to the

descriptions of the analysis summary provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-25

- **PDF Page 637:** First Right Triangle point, last sentence: Insert "land-use based" between Other and project modifications.

Response A5-25

Because all of the project modifications listed following the requested addition are not "land-use based," the suggested text revision is not appropriate. No changes have been made to the Draft EIR in response to this comment.

Comment A5-26

- **ES-20 3.4-1/3.4-3:** Biological Studies listed as Mitigation. Mitigation is a result of a biological impact, studies determine what impacts are, levels of severity, and direct mitigation efforts.

Response A5-26

The comment appears to reference the biological resources mitigation measures, as presented in Table ES-1 ("Summary of Impacts and Mitigation Measures"). As noted in the comment, these mitigation measures require the completion of surveys to determine the potential for project-level impact. This mitigation approach is the result of the potential for impacts to biological resources at the plan level and reflects the range of potential activities that could occur with plan implementation, as well as the range of geographies in the plan area.

As described further in Response A5-11, this is fully consistent with the intent of CEQA and the direction provided in the State CEQA Guidelines. The Draft EIR provides a complete and good-faith effort to disclose the potential for effects and the steps that should be taken to reduce their severity. The comment does not clearly articulate a concern with the mitigation approach that can be addressed further. No revisions have been made to the Draft EIR in response to this comment.

Comment A5-27

- **ES 24:** California red-legged frog: studies and subsequent consultation with US Fish and Wildlife Service (USFWS) should be done two weeks prior to the construction survey presented. If a project is within potentially suitable habitat, consultation needs to be identified a lot earlier than two weeks prior to construction.
- **ES 26-ES 30:** apply the same comment related to ES 24 to the tiger salamander and GGS.

Response A5-27

In response to this comment, text has been added to the "Avoidance and Minimization Measures" section of Mitigation Measure 3.4-3 for California red-legged frog, California tiger salamander, and giant garter snake, specifically to the first bullet point in each species' list of measures on pages 3.4-36, 3.4-37, and 3.4-40 of the Draft EIR. In addition, for more guidance and to assist with consultation, required survey protocols were added for California red-legged frog and California tiger salamander, and survey windows were updated to reflect those protocols.

See Chapter 4 of this Final EIR for the full text of the updated measures in response to this comment. These text modifications provide technical clarification to the descriptions of the US Fish and Wildlife Service consultation process. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-28

- **ES 24/ES 51:** We recommend changing the phrase "if suitable habitat is not found no further mitigation required" to "if suitable habitat is not found no further actions required".

Response A5-28

The comment appears to reference the prescriptive language of the mitigation measures in Table ES-1 and expresses a preference for the phrase "no further actions" over "no further mitigation." In either case, the reference is to

mitigating actions prescribed in the mitigation measures. Because the suggested language revision would not affect the implementation or effectiveness of the mitigation measure, no changes have been made to the Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-29**Draft 2025 Blueprint**

- Managed lanes projects and strategies identified in the Draft 2025 Blueprint plan should align and be consistent with those identified in the Caltrans District 3 Managed Lanes System Plan, Deputy Directive on Managed Lane Facilities (DD-43-R2), and all other Managed Lane guidance developed by the department.

Response A5-29

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. SACOG and Caltrans District 3 coordinated extensively to maximize consistency between the 2025 Blueprint and the District 3 Managed Lanes System Plan (MLSP), and the 2025 Blueprint builds on the 2020 Metropolitan Transportation Plan (MTP)/Sustainable Communities Strategy (SCS) managed lanes network to increase alignment with the MLSP. However, the MLSP is developed under different parameters than the 2025 Blueprint. The MLSP is not fiscally or GHG constrained and does not prescribe the development of a network over time. The MLSP provides different scenarios of managed lanes networks. SACOG will continue to partner with Caltrans District 3 and the Capital Area Regional Tolling Authority (CARTA) to deliver managed lanes that promote carpooling, vanpooling, and transit ridership; improve travel time reliability for all users; reduce greenhouse gas emissions; and maximize the ability to improve travel and the ability of people and goods to reach their destinations, as described in the Deputy Directive on Managed Lane Facilities. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-30

- The toll revenue usage needs to be consistent with FHWA and Caltrans requirements.

Response A5-30

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The use of toll revenue in the SACOG region will be decided by CARTA. Caltrans has a voting seat on the CARTA board and can ensure consistency with any requirements or policy priorities. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-31

- We request that SACOG provide references to the appendices in their Blueprint wherever possible.

Response A5-31

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. As requested in the comment, references to appendices have been added and updated throughout the 2025 Blueprint. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment A5-32

- Include a sentence in the Blueprint body noting that mitigation strategies are addressed in the Draft Program EIR.

Response A5-32

This comment suggests an addition to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. As requested, a section about streamlining environmental analysis has been added to Chapter 1 as additional information on how the 2025 Blueprint addresses state and federal requirements. These text modifications

provide additional clarification about the preparation of an EIR and the requirements for project sponsors and lead agencies. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-33

- Per Government Code Sections 65080(2)(b) and 65584.04(i)(1), the Blueprint is required to outline a regional transportation network. SACOG has fulfilled this requirement through the project list found in Appendix A. We appreciate SACOG's inclusion of this and recommend incorporating a link for additional information about the project selection process within the Blueprint or Appendix A.

Response A5-33

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. In response to the request for more information about the project selection process for Appendix A ("2025 Blueprint Transportation Project List"), an introduction was added to Appendix A, "2025 Blueprint Transportation Project List," to summarize the process and included a URL for additional information. Appendix E of the 2025 Blueprint provides the results of the plan performance, including all metrics and indicators used in the evaluations of the transportation projects, and Chapter 4 of the Blueprint describes the overarching transportation investment strategy. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-34

- **Page 15:** FIGURE 3.1 PEOPLE, JOBS, AND HOUSING: TOTALS AND GROWTH," is the title but the labels at the bottom of the chart—employees, population, and housing units—do not align with the title.

Response A5-34

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The title of Figure 3.1 has been revised to provide consistency with the order of the categories in the legend. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-35

- **Page 20:** Change "Sierra Nevadas" to Sierra Nevada".

Response A5-35

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The callout box highlighting regional economic strategies in Chapter 3 of the 2025 Blueprint has been corrected to "Sierra Nevada." These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment A5-36

- **Page 28:** in the Green Means Go section, please elaborate on how it will enhance mobility?

Response A5-36

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. As explained in the description, Green Means Go funding has been directed to the locally nominated Green Zones throughout the region. As explained in Chapter 3 of the 2025 Blueprint, locating more housing near existing transit places more people in areas where there is more access and transportation options. In response to this comment, clarification has been added to the final 2025 Blueprint that the qualities of Green Zones include both VMT reduction and more transportation access than places that are farther away and spread out. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-37

- **Page 42:** Per Title 23 CFR §450.324(b), the Blueprint shall include both long-range and short-range strategies/actions. Chapter 4 of the Blueprint discusses near- term and long term strategies. However, for public transparency when reading the document, SACOG should clearly label or delineate the long-term strategies from the short-range strategies.

Response A5-37

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The introduction to Chapter 6, "Policies and Implementation Actions," in the 2025 Blueprint has been revised to clarify that the policies are long-term strategies and the implementation actions are the near-term strategies in the 2025 Blueprint. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-38

- **Page 43:** Mode Split and Transit Ridership: please confirm these are the most current statistics available.

Response A5-38

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The summary of mode share in Chapter 4, "Transportation Vision," of the 2025 Blueprint refers to commute trips (not all trips), and minor corrections have been made for accuracy. These changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-39

- **Pages 45 to 47:** ("Highway Congestion" section), many of these charts/statistics are from 2023 or earlier. Please consider: 1) specifying the year in the text providing context for figures, and 2) adding a sentence or two stating that this is subject to change based upon construction on freeways in the region (US 50 and I-80).

Response A5-39

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. This section, "Measuring Progress Since 2020," specifically looks back at patterns since SACOG's last plan. The text has been updated to note the latest year for which this data was available. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-40

- **Page 46:** Change "Cincinatti" to "Cincinnati".
- **Page 53:** The text on page 53 incorrectly refers to "Figure 4.7" as "Figure 4.9", it seems that the figure numbering is inconsistent throughout this section.
- **Page 53:** it mentions "The plan includes "nearly 200 miles of toll lanes across most major highways in the urban parts of our region (see Figure 4.9)." Please verify if the Figure number referenced is correct.

Response A5-40

This comment provides suggestions for minor text refinements in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The final plan has been updated to the correct spelling of the city of Cincinnati in Figure 4-3, "2023 Traffic Congestion (Annual Per Capita Person Hours of Excessive Delay)." The reference to the figure of the Managed Lane Network in the "Transportation Vision" chapter has been corrected. These changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-41

- **Page 54 (figure 4.7):** Please consider indicating in the figure caption and the corresponding text on page 53 that this represents the future managed lanes network. Additionally, please bold the subheadings within the legend, as they were initially overlooked. To add clarity, please consider rearranging the items in the legend to prevent any confusion that categories like "Local Road" or "Highway/Freeway" are part of the "Blueprint Managed Lane by 2050" section.

Response A5-41

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. This comment requests updates to a figure in the 2025 Blueprint displaying the Managed Lane Network. Figure 4.9 (formerly 4.7) was updated in the final plan to add a separating line between the items in the legend, and the corresponding text now references that the planned network includes nearly 200 miles of toll lanes across most major

highways in the urban parts of the region. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-42

- **Page 55 ("Yolo 80 and CARTA section):** specify that the Yolo 80 Managed Lanes project currently consists of a single toll lane in each direction, as Figure 4.7 depicts it as having dual HOT lanes.

Response A5-42

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Figure 4-9 displays the location of planned dual HOT lanes by 2035 and 2050. The call-out box referenced in the comment has been revised to clarify the project will add one toll lane in each direction, improve entrances and exits, and invest in the existing bike route adjacent to the highway. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-43

- **Page 62:** the Sacramento to Roseville Third Track project is being delivered in two phases. Phase 1, which is scheduled for completion by 2029, will increase passenger rail service from one to three daily round-trips. The full expansion to ten daily round-trips will occur in Phase 2, which does not have a scheduled completion date. It's important to note that Union Pacific freight operations will continue uninterrupted throughout both phases of the project.

Response A5-43

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. In alignment with this comment and changes to the project's funding and schedule, the sentence has been updated. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-44

- **Page 65 (Figure 5.1):** Please clarify whether the legend indicates a reduction in jobs or percentages, (i.e. "Up to 200 Reduction in Employment." Is this a 200% reduction in employment or a reduction of 200 jobs?).

Response A5-44

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Figure 5.1 in the 2025 Blueprint illustrates the geographic distribution of jobs, or employment opportunities. The title of Figure 5.1 has been revised to "Change in Employment (Jobs) 2020–2050." The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-45

- **Page 68-69:** figures 5.3 & 5.4, are these figures for home based or work based or an average of both?

Response A5-45

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Figures 5.3 and 5.4 show residential VMT defined as total household VMT per capita. The VMT is assigned to the location of the household's primary residence and divided per capita of the defined geography. For example, a commute trip VMT is assigned to the traveler's residence. Work- or employment-based VMT summarized at place of work is not shown in Figures 5.3 and 5.4. For a full discussion of home-based and work-based VMT, please refer to Appendix E, "Plan Performance of the 2025 Blueprint." No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment.

Comment A5-46**Appendix A:**

- ▶ Per Title 40 CFR §93.101, SACOG is required to identify any regionally significant projects. However, Appendix A does not specifically highlight these projects. SACOG must clearly differentiate which projects are regionally significant within their project list.
- ▶ Appendix A outlines both the constrained and unconstrained project lists. We request that SACOG include a note in the status section indicating that projects which are planned or programmed are part of the fiscally constrained list, similar to the amendment priority.

Response A5-46

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Appendix H, "Conformity Analysis of the 2025 Blueprint," contains a list of all regionally significant, and nonexempt projects that are listed in Appendix B, "Non-Exempt/Regionally Significant Project List." Appendix A has been updated with an additional reference to this information in Appendix H of the 2025 Blueprint. This change does not affect the analysis or conclusions provided in the Draft EIR.

Appendix A of the 2025 Blueprint includes the status of projects as planned or programmed in the last column of the table. The projects in Appendix A listed as "Planned" and "Programmed" are considered the constrained projects. The projects listed as "Amendment Priority" are not part of the fiscally constrained list of projects. This information has been clarified in the introduction to Appendix A of the 2025 Blueprint, and the changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-47

- ▶ Please add the following project to Appendix A:

SACTrak ID: Not Assigned **County:** Various - Yolo & Sac **Lead Agency:** Caltrans HQ

Title: I-5 Truck Parking Information Management System (TPIMS)

Description: Improve truck parking availability information along Interstate 5 (I-5) by implementing a Truck Parking Information Management System (TPIMS) at various Safety Roadside Rest Areas (SRRAs) in both the northbound (NB) and southbound (SB) directions along the I-5 corridor. The system will provide real-time parking availability data to truck drivers, addressing a critical gap in safety, efficiency, and logistics coordination. The TPIMS deployment includes detection equipment and Dynamic Parking Availability Signs (DPAS) at SRRAs.

Cost: \$6.4M **Delivery Year:** 2033 **Plan Status:** Planned

- ▶ BP_8 or CAL20569: Please remove either as they are same project.
- ▶ BP_34: Please remove as it is a duplicate of CAL21457.
- ▶ BP_37: Please remove project as this project falls within TRPA boundaries.
- ▶ BP_47: Update project description to the following: Modify Interchange & add complete streets features. SR 99 auxiliary lane: NB & SB from 47th Ave slip on ramp to Florin Rd slip off ramp.
- ▶ BP_71: Update project description to the following: In El Dorado County on Route 50 from Cambridge Rd OC (Br#25-0083) to El Dorado Rd OC (Br#25-76). REHAB, ramp metering, and aux lanes. SHOPP ID 22820 ".
- ▶ CAL15881: The lead agency information was updated in SacTrak to City of Woodland. Please update Blueprint to be consistent with SacTrak.
- ▶ CAL15882: Lead agency information needs to be updated to City of Woodland.
- ▶ CAL20652: Update title to Sac/Placer Ramp Meters.
- ▶ CAL21045: Please remove as it is a duplicate of CAL 21445.

- ▶ CAL21085: Update project description to the following: In Sutter County at SR 99/Riego Road Interchange Repair a Loop ramp meter. Add ramp metering to meet current standards at all on-ramps. Future Configuration is 1+1. (WB Riego Road to SB SR 99) (PM 0.79).
- ▶ CAL21372: Project is complete and can be removed.
- ▶ CAL21415: Please remove as construction is complete.
- ▶ Please consider publishing this information in an Excel file along with a PDF (or instead of a PDF).

Response A5-47

This comment suggests refinements to the list of transportation projects in Appendix A to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Appendix A has been updated as appropriate. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment A5-48

Appendix F:

- ▶ Page 1-11: Change "Desireable" to "Desirable".
- ▶ Page 2-11: Change "Refer toAppendix A" to "Refer to Appendix A".
- ▶ Page 12-36: In Figure 12-2, Change "Equality Liine" to "Equality Line".

Response A5-48

This comment suggests minor text refinements in Appendix F of the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The changes were made as requested to Appendix F of the 2025 Blueprint for clarity and do not affect the analysis or conclusions provided in the Draft EIR.

Comment A5-49

Appendix G:

- ▶ Page 3 (PDF Page 10): Replace double hyphen with an "em dash" to match the rest of the section: "Kasey Lizon-- SACOG".
- ▶ Page 6: Remove the hyphen in "federally-recognized tribes".
- ▶ Page 21: Replace "a" with "an" in the following sentence – "Public transportation is a important way".

Response A5-49

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. This comment requests minor grammatical edits to the overview section of Appendix G, "Outreach and Engagement of the 2025 Blueprint," prepared by SACOG and one of the accompanying reports prepared in collaboration with partner organizations. The sentence on page 6 of the 2025 Blueprint has been corrected to remove the hyphen. This typographical revision does not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

No changes were made to the list of contributors on page 3 or to correct the grammatical error on page 21 because this text is derived from the report on the Built Environment Poll, which was completed in 2023 and has been published.

Comment A5-50

Appendix H:

- ▶ Per Title 40 CFR §93.113, the conformity analysis prepared for the Blueprint shall describe both completed Transportation Control Measures (TCM) and TCMs that are underway. SACOG must also identify any completed TCMs, if applicable.

Response A5-50

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Completed Transportation Control Measures (TCMs) are referenced in the Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan (SMAQMD et al. 2017). No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A5-51

- ▶ 93.110 (a,b) Caltrans recommends including an assumptions table, sample planning assumptions attached, to be included in the MTP to clearly show any planning assumptions; include all referenced tables in Appendix C.

Response A5-51

This comment is related to Appendix H of the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Please see Table 7 of Appendix C, which identifies all planning assumptions in a table format. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment.

Comment A5-52

- ▶ 93.110 (c,d,e,f) Unable to locate the transit fares and road and bridge tolls; recommend including App D for TCM effectiveness and other SIP measures; link is broken.

Response A5-52

This comment is related to Appendix H of the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. In response to this comment, SACOG has clarified within the checklist where each requirement is addressed. SACOG documents the use of the latest transit fares and road and bridge tolls in Chapter 9 of the *User and Model Documentation for SACSIM23* (see <https://www.sacog.org/home/showpublisheddocument/3059/638847202430400000>). TCM effectiveness can be found in the 2025 Blueprint, Appendix E, "Plan Performance" (page 25), as well as in Chapter 7 of the *Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (see <https://www.airquality.org/ProgramCoordination/Documents/Sac%20Regional%202008%20NAAQS%20Attainment%20and%20RFP%20Plan.pdf>). The broken link has been replaced. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment A5-53

- ▶ §93.119 (a, b, c,d)1 & §93.119(g) & §93.119(h,i): The document notes SACOG does have an applicable SIP budget. Please verify this is accurate.

Response A5-53

This comment is related to Appendix H to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. SACOG has budgets for reactive organic gases, oxides of nitrogen (NO_x), respirable particulate matter (PM₁₀), and PM_{2.5} for Yuba-Marysville area. SACOG does not have a PM_{2.5} budget for Sacramento, Placer, Yolo, and Solano nonattainment areas; therefore, the baseline was used in the conformity analysis. A note has been added to the checklist for clarification. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment.

Comment A5-54

- ▶ §93.122 (b)(1)(ii), §93.122 (b)(1)(iii), §93.122 (b)(1)(iv), §93.122 (b)(1)(v): It is recommended that the items listed in these criteria to be included in a table.

Response A5-54

This comment is related to Appendix H to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. SACOG has clarified within the checklist where each requirement is addressed in the *Conformity Analysis* document or in the *User Guide and Model Documentation for SACSIM23*. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment A5-55

- §93.122 (a)(1): Unable to clearly identify open to traffic dates in the tables referenced.

Response A5-55

This comment is related to Appendix H to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The “Milestone Year for Conformity” column in Appendix B, “Non-Exempt/Regionally Significant Project List” identifies the open to traffic date for all regionally significant projects. The section titled “Inclusion of all Federal and Regionally Significant Projects” also clarifies the open-to-traffic date. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment.

Comment A5-56

- §93.124 (a): If there is no safety margin established, please note this in the document.

Response A5-56

This comment is related to Appendix H to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. There are no safety margins for the budgets. A note has been added to the checklist. This revision provides clarification and does not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment A5-57

- §93.124 (b): If there is trading among budgets, please note this in the document.

Response A5-57

This comment is related to Appendix H to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. There is no trading among budgets. A note has been added to the checklist. This revision provides clarification and does not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Letter A6 County of Placer Community Development Resource Agency

Leigh Chavez, Principal Planner/Environmental Coordinator

August 7, 2025

Comment A6-1**Planning Comments:**

The Placer County Community Development Resource Agency, Long Range Planning Division, appreciates the opportunity to review and comment on the Draft Program Environmental Impact Report (Draft EIR) for SACOG’s 2025 Blueprint. As the division responsible for updating and implementing the County’s General Plan—as well as overseeing land use planning, development review, and community planning—we offer the following comments and requests for coordination:

Section 2.5.2 - 2025 Blueprint Policies and Supportive Strategies**BUILD VIBRANT PLACES FOR TODAY’S AND TOMORROW’S RESIDENTS**

Placer County supports the overarching goals of the Vibrant Places policies in the 2025 Blueprint and appreciates SACOG’s efforts to align regional land use, housing, and transportation planning. The County is particularly supportive of policies that provide technical assistance (Vibrant-1), expand funding for infrastructure and affordable housing in low vehicle miles traveled (VMT) areas (Vibrant-2), and promote economic development and inclusive public engagement (Vibrant-8 and Vibrant-10).

However, we respectfully request clarification on how progress under Vibrant-3—which outlines a suite of local land use reforms—will be interpreted, and whether local discretion will be preserved in determining the applicability of these reforms based on unique community characteristics. These include infrastructure readiness, public safety

concerns (e.g., emergency evacuation constraints in Wildland-Urban Interface areas), and consistency with adopted General Plans.

Vibrant-3 appears to prescribe specific policy directions—such as transitioning to by-right development approvals, eliminating or reducing parking minimums, and upzoning for missing middle and higher-density housing—without acknowledging the diversity of land use contexts across the region. While many of these reforms are already being considered or implemented in appropriate areas of the County, a one-size-fits-all approach may undermine well-established local planning processes. Placer County's land use authority must remain flexible to accommodate a broad spectrum of community types, from rural and agricultural areas to high-growth master planned communities.

Vibrant-5, which proposes prioritizing infrastructure and transportation funding based on a jurisdiction's progress on Vibrant-3 policies, raises further concerns. Linking funding to the adoption of specific reforms could unintentionally penalize jurisdictions—particularly in unincorporated areas—that face legitimate constraints on rapid policy implementation, such as infrastructure phasing plans, CEQA compliance, limited governance tools, or the need for robust public engagement. These areas are often already advancing regional goals through pipeline projects and often bear the cost of regional growth-supporting infrastructure.

The County recommends the following:

- ▶ Clarify that the policy reforms in Vibrant-3 are intended as a flexible menu of best practices, not mandates;
- ▶ Ensure that Vibrant-5 includes provisions that recognize jurisdictional differences and progress made through approved and planned growth efforts, such as Placer Vineyards, Placer One, and Regional University; and
- ▶ Engage in further collaboration with counties to define how alignment with Vibrant-3 policies will be evaluated and incorporated into funding decisions in a fair, transparent, and context-sensitive manner.

Response A6-1

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. In response to the request to clarify Policies Vibrant-3 and Vibrant-5, please refer to the text in the plan.

Specifically, Chapter 3, "Housing, Jobs, and Land Use," of the 2025 Blueprint documents the statements of commitment the SACOG board adopted for the 2025 Blueprint, including: "The MTP/SCS does not regulate local land use authority or preclude any local jurisdiction from planning and approving growth that is different in any way, including in terms of total units or geographic extent." In addition, Chapter 5, "Land Use and Transportation Integration," (page 70) in the discussion of SB 375, states: "While the MTP/SCS is required to integrate land use and transportation planning, the plan recognizes and protects local land use authority. Under SB 375 and the MTP/SCS, the region's cities and counties retain local land use authority over where future development occurs. The plan does not mandate any changes to local zoning rules, general plans, or processes for reviewing projects; nor can the plan act as a cap on development in any given jurisdiction."

In addition, as an introduction to Chapter 6, "Policies and Implementation Actions," the 2025 Blueprint explains that the policies that were developed recognize "that no single solution works everywhere, and implementation of the plan's policies will look different in different places." This introduction also states: "While SACOG develops and implements programs and actions that support the policies outlined in this chapter, the collective efforts of cities, counties, transit operators, special districts, Caltrans, and others will ultimately determine the efficacy of the plan's policies... Alignment with the regional plan is a requirement for some programs, but more broadly can provide a strong signal to state and federal leaders that the region is coordinated, in line with federal and state priorities, and ready for investment."

No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A6-2**FOSTER THE NEXT GENERATION OF MOBILITY SOLUTIONS**

Placer County is generally supportive of the Next Generation Mobility policies in the 2025 Blueprint. The County recognizes the value of policies that promote shared mobility programs (NextGen-1), expand Transportation Demand Management and travel tools (NextGen-2), support equitable zero-emission vehicle deployment (NextGen-3), and enhance the long-term fiscal sustainability of transit services (NextGen-4). We also support the goal of advancing intelligent transportation systems (NextGen-5) to improve corridor performance and multimodal efficiency. However, we recommend that SACOG ensures these policies are implemented in a context-sensitive manner that accounts for the geographic and service delivery differences between urban, suburban, and rural communities. SACOG's support—both technical and financial—will be critical to pilot innovative programs, close infrastructure gaps, and ensure equitable benefit distribution across the region, particularly in unincorporated and Wildland-Urban Interface areas.

Response A6-2

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. For the policies noted in the comment, specifically, NextGen-1 is to "Encourage context-responsive shared mobility programs," and NextGen-3 references support that "considers the diversity of regional needs and contexts, including rural, urban, and suburban communities as well as historically underrepresented communities." Therefore, the policies under the strategy to foster mobility solutions are intended to cover implementation that accounts for geographic diversity. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A6-3**MODERNIZE THE WAY WE PAY FOR TRANSPORTATION INFRASTRUCTURE**

Placer County supports SACOG's recognition that modernizing transportation funding is essential to meeting regional infrastructure and mobility needs. We support **Invest-1** and **Invest-2** in principle and urge SACOG to advocate for **equitable statewide funding mechanisms** that reflect the travel patterns of rural and suburban areas. We strongly support targeted investment in rural road maintenance and freight corridors, as outlined in **Invest-2**.

However, we urge caution regarding **Invest-3 through Invest-5**, especially proposals for regional tolling. Any CARTA-related initiatives should include **local jurisdictional input and governance**, and tolling strategies must account for impacts on **unincorporated communities, lower-income commuters, and those with limited transit options**.

Revenues from tolling should be transparently reinvested into the communities and corridors from which they are generated.

The County also supports the intent of **Invest-6 through Invest-9**, especially the emphasis on:

- ▶ Maintaining a state of good repair;
- ▶ Protecting low-income and rural households from disproportionate impacts;
- ▶ Preserving privacy in revenue collection systems.

We recommend that **Invest-6** explicitly acknowledge the need to fund **system expansion** where consistent with CEQA-cleared, locally adopted plans. Additionally, while we support SACOG's encouragement of local funding strategies (**Invest-8**), local agencies must retain **decision-making authority** over how funds are used. We appreciate SACOG's technical support on grant applications (**Invest-9**) and encourage continued prioritization of **regionally significant projects** that benefit rural and unincorporated areas.

Response A6-3

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. CARTA's board was specifically structured to ensure local representation regarding tolling. Currently, Placer County has a nonvoting seat on the CARTA board. If a tolling project advances in Placer County, two locally elected officials from Placer County and/or its cities will be appointed from the Placer County Transportation Planning Agency board and

one from the SACOG board. This would give Placer County the same voting representation as any other county with a toll facility in the region. Additionally, CARTA exists to operate facilities once the decision has been made at the local level to build a toll facility. CARTA will not lead the creation of any new toll facilities. In Placer County's case, Placer County Transportation Planning Agency would lead the discussion at the county level on whether and where to advance tolling in Placer County. State law requires toll revenue to be reinvested in the corridor from which it is generated. Although proposed expenditure plans are adopted regionally by CARTA, the decisions on what to invest in are generated at the local level.

Under the strategy to modernize the way transportation is financed, two policies—Invest-6 and Invest-8—have been updated to clarify that SACOG supports strategic expansions of the roadway network that are aligned with the 2025 Blueprint's adopted land use scenario and that local agencies would be in the lead on the development of any new funding expenditure plans. The changes do not affect the analysis or conclusions in the Draft EIR.

Comment A6-4

BUILD AND MAINTAIN A SAFE, EQUITABLE, AND RESILIENT MULTIMODAL TRANSPORTATION SYSTEM

Placer County supports the goals of the Build policies in the 2025 Blueprint and recognizes their alignment with the County's priorities related to transportation maintenance, emergency preparedness, safety, and economic access. We support Build-1 through Build-8 and encourage SACOG to ensure these policies are implemented in a manner that reflects the needs of both urbanizing and rural communities. Specifically, we recommend that SACOG prioritize funding for state of good repair projects in counties with extensive rural road networks (Build-1), support scalable transit solutions in lower-density areas (Build-2), and address congestion relief on critical corridors in growth areas such as the Sunset Area and Auburn-Bowman (Build-3 and Build-8). We also strongly support investment in evacuation-capable infrastructure and wildfire-resilient transportation systems (Build-6), as well as bicycle and pedestrian projects that improve school and transit access in unincorporated communities (Build-7). SACOG's continued collaboration with local jurisdictions will be essential to successfully implement these strategies.

Section 2.6 - Plan Implementation

Placer County supports the overarching framework for implementation of the 2025 Blueprint as described in Section 2.6. We appreciate SACOG's recognition that successful implementation depends on close collaboration with local jurisdictions, and that many of the Blueprint's objectives—particularly those related to housing, transportation, equity, and climate resilience—require locally led planning and strategic infrastructure investment.

We recommend that SACOG continue to prioritize infrastructure funding and technical assistance for Blueprint-aligned growth areas in unincorporated Placer County, including Placer Vineyards, Placer One, the Regional University site, and the Government Center Master Plan area—each of which is supported by CEQA-cleared plans and phased infrastructure strategies and reflects the intent of the Blueprint land use forecast.

Additionally, we request that SACOG explicitly acknowledge the unique implementation challenges faced by large unincorporated counties. These include infrastructure financing constraints, limited service access in rural areas, emergency evacuation needs in Wildland-Urban Interface (WUI) communities, and the need for tailored approaches to equity in low-density areas such as North Auburn, Sheridan, and the Sierra foothill region. We recommend that Blueprint performance monitoring include both qualitative and context-sensitive metrics that account for local conditions. Funding prioritization frameworks should avoid disadvantaging jurisdictions with adopted long-range plans and active development pipelines that already advance regional objectives.

Placer County remains committed to advancing regional goals through local action and appreciates the opportunity to partner with SACOG on effective and equitable Blueprint implementation.

Response A6-4

The comment expresses support for Policies Build-1 through Build-8 in the 2025 Blueprint and the framework for plan implementation and requests specific acknowledgement and prioritization of projects in large unincorporated counties. The comment does not raise any issues related to adequacy of the Draft EIR. SACOG acknowledges Placer County's concerns and the importance of working with local jurisdictions to ensure plan implementation is aligned

with Placer's unique challenges and opportunities. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A6-5

Section 3.2 – Agriculture and Forestry Resources

Placer County supports SACOG's inclusion of agricultural and forestry resource impact analysis in Section 3.2 of the Draft EIR and acknowledges the Blueprint's efforts to direct growth away from high-value farmland and timberland. However, we recommend revisions to more accurately reflect the potential impacts on working lands within unincorporated Placer County and to strengthen mitigation and implementation strategies accordingly.

The DEIR identifies the potential for conversion of over 2,100 acres of farmland and over 2,700 acres of forest land across the region, with portions of these impacts likely occurring within western and eastern Placer County. In particular, areas near the rural-urban edge may face indirect development pressure resulting from Blueprint-aligned infrastructure investments and land use changes. These pressures pose long-term challenges for agricultural viability, forest health, and land conservation—particularly in communities experiencing active growth alongside resource lands, such as Sheridan, the Placer Vineyards and Riolo Vineyards areas, and the Sierra foothills.

While the DEIR identifies mitigation measures, it does not specify how SACOG will collaborate with local jurisdictions to implement these measures in a locally appropriate and regionally coordinated manner. We request that Mitigation Measures 3.2-1 through 3.2-4 be revised to include:

- ▶ A commitment by SACOG to coordinate with local jurisdictions on prioritizing funding for agricultural and forest land buffers, conservation easements, and infrastructure siting that avoids farmland conversion;
- ▶ Consideration of regional growth-supporting infrastructure investments that simultaneously protect resource lands, particularly in counties with significant rural development and conservation goals;
- ▶ Clarification on how Blueprint-aligned land use decisions will interface with local zoning and Williamson Act contracts to avoid land use conflicts in unincorporated areas.

Response A6-5

The Draft EIR includes four mitigation measures that are intended to reduce the impacts of the 2025 Blueprint on agricultural and forestry resources.

- ▶ Mitigation Measure 3.2-1, "Provide for Permanent Protection of Farmland," would address project-level conversion of Farmland to non-agricultural uses.
- ▶ Mitigation Measure 3.2-2, "Provide for Permanent Protection of Forest Land and Timberland," would address project-level conversion of forest land to non-forest uses.
- ▶ Mitigation Measure 3.2-3, "Minimize Indirect Conversion of Farmland to Non-Agricultural Use" and Mitigation Measure 3.2-4, "Manage Growth at the Rural-Urban Interface to Support the Long-Term Viability of Agriculture," would both address other changes to the existing environment that could result in the conversion of Farmland to non-agricultural uses.

The comment requests modification of Mitigation Measures 3.2-1 through 3.2-4 to include a commitment to prioritize funding toward "agricultural and forest land buffers, conservation easements, and infrastructure siting that avoids farmland conversion." It is not clear from the comment whether the funding would be provided by local or SACOG funds. It is also unclear how such a requirement would be measurably enforced in the context of a mitigation measure. SACOG's grant technical assistance programs have helped several agencies secure conservation easement grants from the state. SACOG has also worked with each county in the region and Valley Vision on the Coordinated Rural Opportunities Plan through the Rural-Urban Connections Strategy Program. Finally, SACOG administers regional funding rounds that provide grants to projects evaluated on multiple criteria, including how they support farm-to-market and rural community needs. Mitigation Measure 3.2-3 establishes that implementing agencies should require project proponents to design projects to minimize the loss of farmland. Mitigation Measure 3.2-4 requires

implementing agencies to adopt regulations, such as agricultural buffers, to minimize conversion pressures at the urban edge.

The comment also requests “[c]onsideration of regional growth-supporting infrastructure investments that simultaneously protect resource lands.” Without further clarification about what such infrastructure would entail and what effects would be reduced by such infrastructure, SACOG is not able to consider the appropriateness of such infrastructure investments as mitigation. Note, however, that the Coordinated Rural Opportunities Plan mentioned above identified infrastructure needs to support the rural/agricultural economy and communities in each county. In Placer County, those infrastructure needs include several upgrades to water infrastructure and storage, well water treatment to protect ground water for agriculture, septic and well improvements for food system worker housing, and new broadband infrastructure.

Finally, the comment requests that Mitigation Measures 3.2-1 through 3.2-4 are revised to include clarification about the interface between Blueprint-aligned land use decisions and local zoning and Williamson Act contracts. Potential for regional land use and growth under the 2025 Blueprint to conflict with existing zoning or Williamson Act contracts is described in Impact 3.2-2 (Draft EIR pages 3.2-19 and 3.2-20). Although significant and unavoidable impacts are anticipated, no feasible mitigation is identified that would eliminate the potential for conflict with protective land use designations. As explained in the Draft EIR, implementing agencies may require evaluation of alternative development sites and/or plan amendments at the project level to reduce conflict with existing land use designations. Because Mitigation Measures 3.2-1 through 3.2-4 are not applied to Impact 3.2-2, the request to clarify how the mitigation measures address the issues of local zoning and Williamson Act contract conflicts is unclear, and no revisions to the Draft EIR have been made in response to this request.

Comment A6-6

Additionally, we recommend that performance monitoring for Blueprint implementation track farmland and forest land conversion metrics and include mechanisms for regional coordination when significant cumulative impacts are anticipated.

Placer County remains committed to protecting agricultural and forestry resources as part of its broader climate resilience and land stewardship goals, and we welcome continued collaboration with SACOG on this important issue.

Response A6-6

Placer County’s recommendation to track farmland and forest land conversion is noted. SACOG maintains a Sacramento Area Regional Indicators Dashboard that tracks where housing is built. Farmland conversion is currently tracked on this dashboard, and forest land conversion may be added to the package of indicators in the future. (See <https://experience.arcgis.com/experience/37547feca64546dbbd0a4030dd84bb42/page/Housing-Location/>.) In addition, Policy Vibrant-6 has been updated to include strategic growth patterns that minimize impacts on working lands and habitat. This revision strengthens and clarifies the policy, and the change does not affect the analysis or conclusions provided in the Draft EIR.

Comment A6-7

Section 3.3 - Air Quality and Operational Emissions Offsets

The Draft EIR (Section 3.3, Air Quality) appropriately identifies that certain local air districts, such as SMAQMD, offer pathways for mitigating construction emissions through off-site mitigation fees when on-site reductions are infeasible. However, the analysis does not reflect the guidance or programs available in Placer County, where the Placer County Air Pollution Control District (PCAPCD) takes a different approach.

We request the following revisions or clarifications to the Air Quality section:

- ▶ Recognize that PCAPCD does not offer off-site mitigation fees for construction emissions but instead recommends offsetting significant operational emissions that exceed significance thresholds through local emissions reduction projects.

- ▶ Incorporate a reference to the PCAPCD Clean Air Grant Program, which allows developers to fund verifiable, surplus emissions reduction projects (e.g., diesel engine replacements, EV infrastructure) that can be credited as CEQA mitigation.
- ▶ Clarify that in jurisdictions such as Placer County, where feasible on-site operational mitigation cannot bring emissions below thresholds, off-site mitigation strategies should be considered during project-level CEQA review and can help reduce impacts to less-than-significant levels in accordance with PCAPCD CEQA Guidelines.

Response A6-7

The comment identifies that Section 3.3 of the Draft EIR correctly indicates that some local air districts offer pathways for mitigating construction emissions through off-site mitigation fees when on-site reductions are infeasible and requests that Section 3.3 include discussion of guidance and programs available in Placer County per Placer County Air Pollution Control District's (PCAPCD's) approach. The comment provides suggested revisions to Section 3.3.

In response to this comment, information about PCAPCD's Clean Air Grant Program has been added to the "Air District Thresholds of Significance for Construction and Operational Criteria Air Pollutants" discussion on page 3.3-14 of the Draft EIR. In addition, text of the second paragraph under the heading "Significance after Mitigation" describing the significance of Impact 3.3-1, "Conflict with or Obstruct Implementation of an Applicable Air Quality Plan," on page 3.3-47 of the Draft EIR has been revised to address conditions in Placer County. See Chapter 4 of this Final EIR for the updated text in response to this comment. These text modifications provide technical clarification and do not affect the analysis or conclusions provided in the Draft EIR.

Comment A6-8

- ▶ Add language to Mitigation Measure 3.3-1 to reflect this option. A suggested revision might read:

"In jurisdictions where operational emissions exceed local air district thresholds after implementation of feasible on-site measures, project proponents should coordinate with the applicable air district (e.g., PCAPCD) to identify opportunities to offset remaining emissions through participation in approved local programs, such as the PCAPCD Clean Air Grant Program."

By integrating this local regulatory context, the Blueprint EIR will more accurately reflect feasible mitigation pathways and reinforce coordination with air districts across the region.

Response A6-8

The comment suggests the addition of language to Mitigation Measure 3.3-1 in the Draft EIR related to coordination with PCAPCD and participation in PCAPCD's Clean Air Grant Program. Mitigation Measure 3.3-1, "Require Applicable Design Measures" obligates implementing agencies to require projects that exceed the long-term operational thresholds to mitigate air quality impacts to below such thresholds using applicable and feasible mitigation, as defined by the local air district, and lists examples of design measures that would reduce criteria pollutant emissions. This mitigation measure does not preclude the use of offset programs to fulfill any remaining mitigation obligation. As described above in Response A6-7, text has been added to the "Significance after Mitigation" discussion to acknowledge the regulatory context and to elaborate on the potential mitigation pathways that are described in more general terms in the Draft EIR mitigation.

Comment A6-9

Section 3.4 – Biological Resources

Placer County appreciates the inclusion of biological resource considerations in Section 3.4 of the Draft EIR and supports SACOG's recognition of the importance of avoiding and minimizing impacts to habitat and special-status species. The County also acknowledges the Blueprint's role in directing growth away from ecologically sensitive areas through compact development patterns.

However, we recommend that Section 3.4 be revised to more accurately reflect the robust conservation planning and implementation capacity established through the Placer County Conservation Program (PCCP). The PCCP is a comprehensive regional strategy that includes a Habitat Conservation Plan/Natural Community Conservation Plan

(HCP/NCCP) and Aquatic Resources Program (CARP), covering approximately 201,000 acres in western Placer County. The program provides permit streamlining, implements a reserve system for long-term habitat preservation, and coordinates mitigation for over a dozen special-status species and sensitive habitat types.

We request that Section 3.4 be updated to:

- ▶ Clearly describe the PCCP's scope, legal status, and role in achieving Blueprint-aligned biological resource outcomes;
- ▶ Recognize the PCCP's use of in-lieu fees, reserve design, and local implementation capacity as a model for regional mitigation;
- ▶ Acknowledge the County's existing habitat protection ordinances, tree preservation policies, and conservation easements as supporting infrastructure for biological resilience;
- ▶ Align Mitigation Measures 3.4-1 through 3.4-7 with the provisions of the PCCP and clarify that projects consistent with the PCCP may be considered adequately mitigated under CEQA.

Suggested EIR Revision Language:

"Placer County has adopted the Placer County Conservation Program (PCCP), which includes a Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) and the Western Placer County Aquatic Resources Program (CARP). Covering approximately 201,000 acres, the PCCP establishes a regional reserve system and mitigation framework that provides streamlined environmental permitting and compliance with the federal Endangered Species Act, California Endangered Species Act, and Clean Water Act. Development projects within the PCCP Plan Area that comply with PCCP requirements may be considered to have fulfilled CEQA mitigation obligations for PCCP covered species and habitats. The PCCP also integrates in-lieu fee mechanisms, monitoring protocols, and adaptive management strategies to ensure long-term conservation outcomes."

"Where applicable, SACOG encourages jurisdictions to utilize existing conservation plans such as the PCCP to implement Mitigation Measures 3.4-1 through 3.4-7 in a manner that supports Blueprint implementation while reducing regulatory duplication and supporting local habitat management capacity."

Such revisions would ensure that the EIR accurately reflects available mitigation tools and avoids redundancy or confusion in implementation.

Response A6-9

In response to this comment, the introduction paragraph for the Placer County Conservation Program (PCCP) in Section 3.4.1, "Regulatory Setting," of the Draft EIR has been replaced with the suggested edits from commenter's first paragraph, except for the second-to-last sentence, which was incorporated more broadly into the "Methodology" discussion in Section 3.4.3, "Environmental Analysis" (addressed further at the end of this response). Regarding Placer County's habitat protection ordinances, tree preservation policies, and conservation easements, some of these are referenced in the "Ordinances" section of Section 3.4.1, "Regulatory Setting." Due to the programmatic nature of this EIR, the large footprint of the plan area, and the length of the section as it currently stands, a comprehensive list of, and details for, each ordinance were not included. As part of Mitigation Measure 3.4-1, a biologist hired by the implementing agencies would be required to "determine whether any local policies or ordinances intended to protect biological resources (e.g., tree removal policies) would apply, and whether construction activities would result in conflicts with these policies or ordinances." In addition, regarding the request to align all measures with the PCCP, Placer County's program is not the only program (e.g., habitat conservation plan [HCP], natural communities conservation plan [NCCP]) within the 2025 Blueprint plan area that can be utilized for streamlining permitting for, and mitigation of, biological impacts. If an alignment analysis was conducted for the PCCP, it would also need to be conducted for the other programs in the 2025 Blueprint plan area (e.g., Natomas Basin HCP, Yolo HCP/NCCP). As part of Mitigation Measure 3.4-1, implementing agencies are already required to review any relevant HCP/NCCP that overlap the area of a proposed project. Edits have been made to this mitigation measure to also include required review of any aquatic resources or in-lieu fee programs that overlap the project area. In addition, general language about coverage from the programs in the 2025 Blueprint plan area was included as the last paragraph in the

"Methodology" section in Section 3.4.3, "Environmental Analysis." See Chapter 4 of this Final EIR for the updated text in response to this comment. These text modifications provide technical clarification and do not affect the analysis or conclusions provided in the Draft EIR.

Comment A6-10

Section 3.7 - Climate Change and Greenhouse Gas (GHG) Mitigation

The Draft EIR identifies significant and unavoidable GHG impacts, even with the application of Mitigation Measure 3.7-2. The County requests that SACOG recognize and incorporate local and state-endorsed GHG mitigation strategies into Blueprint implementation, especially those contained in Placer County's Sustainability Plan (2020).

Specifically, we recommend the following updates to Mitigation Measure 3.7-2:

- ▶ Reference and adopt PCSP construction mitigation practices, such as use of renewable diesel, deployment of battery-electric construction equipment, and electrified jobsite power.
- ▶ Incorporate language recommending participation in local offset programs, or through a California Air Resources Board (CARB)-accredited carbon offset protocol, where project-level GHG emissions exceed significance thresholds after the implementation of feasible on-site mitigation.

Response A6-10

The suggested language has been added to Mitigation Measure 3.7-2 on pages ES-63 and 3.7-25 of the Draft EIR in response to this comment. See Chapter 4 of this Final EIR for the updated text in response to this comment. These text modifications provide technical clarification and do not affect the analysis or conclusions provided in the Draft EIR.

Comment A6-11

Section 3.19 – Wildfire: Evacuation, Equity, and Regional Coordination

Placer County supports the inclusion of wildfire risk analysis in Section 3.19 of the Draft EIR. However, we recommend that this section be revised to more comprehensively reflect the complexities of planning for wildfire-prone areas and to better align with growth assumptions and regional context described in Appendix C. (See related comments under Appendix C.)

The DEIR correctly notes that Rural Residential Communities—particularly in eastern and western Placer County—overlap substantially with Very High Fire Hazard Severity Zones (VHFHSZs). However, it does not fully address the compounding risks these communities face, including limited access routes, constrained evacuation capacity, and gaps in emergency services. Although large-scale growth is not forecasted in these areas, even modest increases in population or employment—acknowledged in Appendix C—can strain evacuation systems if not planned in coordination with hazard mitigation efforts.

Mitigation Measure 3.19-1 appropriately requires project-level Fire Safe Plans in VHFHSZs but places implementation responsibility solely on future lead agencies.

The Blueprint EIR does not provide adequate guidance on how SACOG will facilitate regional coordination, scenario modeling, or funding prioritization to address wildfire evacuation and infrastructure needs at a broader scale.

To strengthen Section 3.19 and enhance consistency with public safety, equity, and climate resilience goals, we recommend that SACOG:

- ▶ Acknowledge the need for regional coordination in planning for evacuation capacity, redundancy, and multimodal access in fire-prone areas;
- ▶ Clarify how Blueprint implementation will support compliance with state evacuation planning mandates (AB 747, AB 1409, SB 1241) in jurisdictions where planned growth intersects with fire hazard zones;
- ▶ Reconcile Appendix C's assumptions about modest Rural Residential growth with the potential evacuation impacts described in Section 3.19;

- ▶ Expand Mitigation Measure 3.19-1 to include SACOG-level commitments to support interjurisdictional coordination, scenario development, and funding assistance for subregional evacuation strategies and fire-resilient infrastructure;
- ▶ Collaborate with CAL FIRE, OES, and local agencies to identify critical evacuation corridors, infrastructure vulnerabilities, and PSPS-prone areas;
- ▶ Support planning and funding for resilience hubs, road retrofits, communications infrastructure, and other tools that reduce community vulnerability and improve regional emergency response.

Incorporating these revisions will help ensure the Blueprint meaningfully supports wildfire resilience efforts and protects vulnerable populations in high-risk communities throughout the region.

Response A6-11

The comment expresses support for the wildfire analysis in the Draft EIR and Mitigation Measure 3.19-1 but suggests that the Draft EIR “does not provide adequate guidance on how SACOG will facilitate regional coordination, scenario modeling, or funding prioritization to address wildfire evacuation and infrastructure needs at a broader scale.” Each of the six recommendations provided to strengthen the section are discussed below. For the reasons described below, no revisions have been made to the Draft EIR in response to this comment. However, Placer County’s interest in how SACOG can support rural safety, equity, and resilience is noted. SACOG encourages Placer County’s participation and partnership in developing SACOG’s 5-Year Implementation Plan for the Blueprint, which would outline the support local agencies, like Placer County, would need from SACOG in implementing local priorities aligned with the 2025 Blueprint.

Acknowledge the Need for Regional Coordination in Planning for Evacuation Capacity

Section 3.19 of the Draft EIR evaluates impacts related to exposure to, or exacerbation of, loss, injury, or death; exposure to pollution; and risk of flooding or landslide related to wildfire hazards. As explained on page 3.19-1 of the Draft EIR, evacuation plans, including those within areas of identified wildfire hazard risk, are discussed in Section 3.8, “Hazards and Hazardous Materials,” of the Draft EIR. State and regional coordination of evacuation planning is addressed on pages 3.8-9, 3.8-10, 3.8-11, 3.8-29, and 3.8-30. As explained under the heading “Regional Preparedness Strategy” on page 3.8-10, SACOG completed a Regional Emergency Preparedness Strategy to develop a clear vision for how transit assets and operators are deployed in evacuation situations in the Sacramento region in 2023. During an emergency, such as flood or fire, transit vehicles can be deployed to evacuate residents who may not have a private vehicle, including people in medical facilities and assisted living centers. This strategy lays out steps for SACOG and its transit and emergency services partners to take so that resources are efficiently deployed. The strategy’s recommendations include developing plans for transit agencies to operate and maintain each other’s fleets if one facility is shut down. Therefore, the Draft EIR acknowledges this need. Moreover, the requested acknowledgement does not mitigate any significant environmental impact.

Clarify how Blueprint Implementation Will Support Compliance with State Evacuation Planning Mandates

Assembly Bill (AB) 747, AB 1409, and SB 1241 are related to local planning and require the review and update of safety elements to identify evacuation routes. There is no requirement that the 2025 Blueprint, as an SCS or Regional Transportation Plan, support compliance with these mandates. The potential for the 2025 Blueprint to impair the implementation of adopted emergency evacuation plans is evaluated in Impact 3.8-6 (Draft EIR pages 3.8-41 and 3.8-42).

Emergency response and emergency evacuation plans are designed by the OES for each county in the SACOG region for the purpose of responding to potential emergency situations (e.g., fires, floods, or earthquakes). Implementation of the 2025 Blueprint does not include any changes to the policies or requirements within any of the established emergency plans, and SACOG has no land use authority to adopt local land use plans or approve local land use projects. However, improved transportation infrastructure and a development pattern that focuses growth in existing communities, as outlined in the 2025 Blueprint, would support the evaluation planning at the local level.

Reconcile Appendix C's Assumptions About Modest Rural Residential Growth with the Potential Evacuation Impacts

The Draft EIR evaluates but does not identify potentially significant evacuation impacts in either Section 3.8 or Section 3.19. As described further in Response A6-12, below, the land use forecasts included in Appendix C of the 2025 Blueprint are based on local planning and reflect anticipated growth without the influence of 2025 Blueprint policies. As described in Chapter 4 of the 2025 Blueprint, the plan prioritizes investment in 3,400 miles of roadway infrastructure located in flood or fire risk areas.

Expand Mitigation Measure 3.19-1 to include SACOG-level commitments to support interjurisdictional coordination, scenario development, and funding assistance for subregional evacuation strategies and fire-resilient infrastructure

Mitigation Measure 3.19-1 would require all land use projects proposed in State Responsibility Areas and Local Responsibility Areas in Very High Fire Hazard Severity Zones to complete a Fire Safe Plan to address and minimize the potential effects resulting from wildland fire hazards. The mitigation is intended to address risks associated with developments that exacerbate wildfire hazards. Specifically, this mitigation measure requires individual project applicants to work with the municipal or regional fire marshal and the California Department of Forest and Fire Protection (CAL FIRE) battalion chief to produce and implement a fire safe plan for land use projects that are located within very high fire hazard areas.

The comment does not articulate how interjurisdictional coordination, scenario development, and funding assistance for subregional evacuation strategies and fire-resilient infrastructure would address the potential for development that aligns with the growth forecasts in the 2025 Blueprint to expose, or exacerbate existing significant exposure of, people or structures to wildfire and further reduce the potential for the plan to increase wildfire hazards. The requested addition to the mitigation measure appears aimed at resolving existing issues with evacuation and infrastructure resilience, which the Draft EIR is not obligated to mitigate.

As explained in the 2025 Blueprint (page 59), the California Office of Emergency Services develops and maintains state-level emergency plans that are supported by county- and community-level plans. In 2023, SACOG completed a Regional Emergency Preparedness Strategy to develop a clear vision for how transit assets and operators are deployed in evacuation situations in the Sacramento region. During an emergency, such as flood or fire, transit vehicles can be deployed to evacuate residents who may not have a private vehicle, including people in medical facilities and assisted living centers. This strategy lays out steps for SACOG and its transit and emergency services partners to take to efficiently deploy resources. The strategy's recommendations include developing plans for transit agencies to operate and maintain each other's fleets if one facility is shut down; using uniform, accessible, and transparent communication during emergencies; and investing in resilient energy storage systems to maintain zero-emission vehicles involved in transit operations during an emergency. Although an important aspect of SACOG's efforts in the region, the strategy is separate from the 2025 Blueprint.

Collaborate with the California Department of Forestry and Fire Protection, the California Governor's Office of Emergency Services, and Local Agencies to Identify Critical Evacuation Corridors

See discussion of SACOG's Regional Emergency Preparedness Strategy above. Also as described above, there is no evidence to suggest that there would be a significant and unavoidable impact related to wildfire evacuation, and additional mitigation is not required.

Reduce Community Vulnerability and Improve Regional Emergency Response

The comment suggests that support for planning and funding for resilience hubs, road retrofits, communications infrastructure, and other tools to improve emergency response should be included in Section 3.19 of the Draft EIR. The purpose of the Draft EIR is to evaluate the potential for the 2025 Blueprint to result in physical environmental impacts. The Draft EIR concludes that the 2025 Blueprint does not have the potential to result in a significant impact related to emergency evacuation. The comment does not provide evidence to support a different conclusion. Development of a program to plan and support these tools is not required. See page 59 of the 2025 Blueprint for further discussion of how prioritization of investments in the roadway infrastructure in fire risk areas supports vulnerable and marginalized communities.

Comment A6-12**Appendix C – Rural Residential and Resource Use Areas: Wildfire Evacuation and Emergency Planning**

Placer County recommends that SACOG incorporate additional context into Appendix C regarding wildfire evacuation and emergency planning for rural residential and resource-based communities. While the narrative correctly notes that these areas are not forecasted for urban-scale development during the MTP/SCS planning period, it also acknowledges potential incremental growth associated with agriculture, forestry, and mining.

Many of these areas—particularly in eastern and western Placer County—are located within CAL FIRE-designated High or Very High Fire Hazard Severity Zones (VHFHSZs) and have constrained or limited evacuation routes. Section 3.19 of the DEIR recognizes that Rural Residential Communities are among the community types with the highest exposure to wildfire risks under the 2025 Blueprint, yet Appendix C lacks complementary discussion about evacuation planning or emergency access limitations in these zones.

To align Appendix C with Section 3.19 and regional hazard mitigation priorities, we recommend the following addition:

"In areas dominated by agriculture, forestry, and rural residential uses—particularly those located within High or Very High Fire Hazard Severity Zones—any incremental development should be planned in coordination with local and regional emergency preparedness efforts, including evacuation planning, redundant access identification, and hazard mitigation strategies. While large-scale urbanization is not anticipated during the planning horizon, SACOG encourages jurisdictions to assess evacuation route capacity, identify opportunities for redundant access, and incorporate wildfire resilience into planning for rural and resource-based communities."

This clarification would better align the Blueprint with CEQA wildfire findings, ensure consistency across DEIR sections, and support integrated public safety planning in the rural-urban interface.

Response A6-12

Related to wildfire evacuation and emergency planning, Chapter 3 of the 2025 Blueprint explains that there is less development proposed for High or Very High Fire Hazard Severity Zones, as designated by CAL FIRE, and the land use forecast minimizes the extent to which land is consumed for development in high-risk areas. The incremental growth referenced in the comment is based on the land use plans of local jurisdictions. It would be up to the discretion of the local jurisdictions, such as Placer County, to evaluate and approve these projects.

The region includes some of the areas of the state at the highest risk of wildfires, particularly in Placer and El Dorado Counties, and the discussion of areas with constrained or limited evacuation routes in the regional transportation network continues in Chapter 4 of the 2025 Blueprint. The 2025 Blueprint addresses the need for infrastructure to be resilient to these events, and roadway infrastructure located in flood or fire risk areas is prioritized for investment. Finally, Chapter 6 of the 2025 Blueprint includes an implementation policy to work with partners throughout the region to identify and support grant applications for measures to improve resiliency and disaster response through coordinated efforts, like the Regional Emergency Preparedness Strategy.

The Draft EIR evaluates the effects of the 2025 Blueprint on emergency response. There is no inconsistency between the analysis of wildfire hazards in Section 3.19 of the Draft EIR and the land use forecast included in Appendix C to the 2025 Blueprint. The suggested text additions in Appendix C are not necessary; however, Policy Invest-2 has been revised to include evacuation routes. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment A6-13**Department of Public Works Comments:**

DPW has comments on the project list (see attached PDF), along with the following comments on the Blueprint policies:

- ▶ Vibrant-5: Funding for transportation projects should be based on demonstrated need, project benefits, performance metrics, collision history, community support for the project, etc. Funding for transportation should be independent of a local agency's land use policies. Refer to Planning's comments above for further comments on Vibrant-3 and Vibrant-5.

- ▶ Invest-2: We fully support this policy's intent of reliable funding strategies for maintenance needs. We respectfully request that evacuation routes be added to the policy language. This is particularly crucial for rural Placer County.
- ▶ Build-7: We support the investment in bicycle and pedestrian infrastructure. However, not all priority infrastructure is on the Regional Trails Network. We respectfully request that this policy be reworded to "...~~and~~ or implements the Regional Trails Network" to provide this additional clarity.

Response A6-13

This comment is on the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. This comment suggests refinements to the list of transportation projects in Appendix A to the 2025 Blueprint. Appendix A has been updated as appropriate. This comment on the policies under "Building Vibrant Communities" is addressed in Response A6-1, above, detailing that the 2025 Blueprint, as the region's MTP/SCS, is required to integrate land use and transportation planning. The Policy Invest-2 has been revised to include evacuation routes, as requested, and Policy Build-7 was edited to clarify support for a range of investments in active transportation infrastructure and/or the trails network as requested. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Letter A7 Sacramento Metropolitan Air Quality Management District

Paul Philley, AICP, Program Manager, Transportation & Climate Change

August 8, 2025

Comment A7-1

Draft EIR Toxic Air Contaminants Analysis

Sac Metro Air District commends the Draft EIR's attention to the impacts of toxic air contaminants (TACs) on public health. Mitigation Measure 3.3-3 currently addresses this issue through Health Risk Assessments when "sensitive land uses or TAC sources meeting CARB's criteria in size and activity...would be sited within the minimum CARB-recommended distances..." While laudable, the siting of sensitive uses near sources of TAC does not constitute an environmental impact under CEQA¹. We would ask that the measure continue to require sources of TAC to implement the best practices listed in the mitigation measure. With respect to the siting of sensitive land uses near TAC sources, exposure reduction measures may be addressed through design features and conditions of approval. Please consider adding these best practices to the Blueprint document for projects with sensitive land uses near TAC sources to incorporate as design features or conditions of approval.

¹*California Building Industry Association v Bay Area Air Quality Management District* (S213478, December 17, 2015)

Response A7-1

Mitigation Measure 3.3-3 is intended to reduce impacts related to TACs at the project level by requiring that health risk assessments (HRAs) be performed when sensitive land uses or TAC sources that meet CARB's criteria in size and activity would be sited within the minimum CARB-recommended distances. Where a site-specific HRA is warranted, feasible mitigation and best practices identified in the HRA would be implemented. Examples of known and effective best practices are provided.

Pursuant to CEQA, a lead agency is only required to identify and focus on the significant effects of a proposed project on the environment. Therefore, a lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time environmental analysis is commenced (State CEQA Guidelines 15126.2[a]). Except where siting of such sensitive receptors would exacerbate hazards, CEQA does not require the mitigation of the environment's impact on the project. The comment cites *California Building Industry Association v Bay Area Air Quality Management District* (S213478, December 17, 2015), in which the California Supreme Court held that CEQA does not generally mandate the analysis of effects of existing environmental conditions on proposed projects. SACOG recognizes that CEQA does not *require* such analysis. However, as both the lead agency and the project proponent, SACOG has the authority to *choose* to disclose the potential effects of the environment on the project and identify suggested protocol for reducing the effects. SACOG cannot require exposure

reduction measures through design features and conditions of approval because SACOG does not have ultimate approval authority over subsequent development.

Therefore, SACOG recommends HRAs for both sensitive land uses and TAC sources in Mitigation Measure 3.3-3. These actions would be consistent with CARB's guidelines. Text has been added to the mitigation measure and the "Significance after Mitigation" section to clarify that local agencies may not have jurisdiction to require HRAs for sensitive land uses where the project would not exacerbate existing TAC-related hazards and that sensitive land uses proposing to streamline analysis using the Draft EIR would not be required to conduct an HRA if there is no potential to increase the severity of the impact. As requested in the comment, Mitigation Measure 3.3-3 continues to require sources of TACs to implement the best practices listed in the mitigation measure. As described in the Draft EIR (page 3.3-59), there would be a significant and unavoidable impact because SACOG cannot require the implementing agency to adopt these mitigation measures, it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation, and the effectiveness of these measures in reducing potential impacts to a less-than-significant level for individual projects that would occur under the 2025 Blueprint cannot be guaranteed. This is because the possibility remains for individual projects, despite implementing all feasible measures recommended in a site-specific HRA, to continue to result in TAC emissions and health risks above local thresholds of significance.

See Chapter 4, "Revisions to the Draft EIR," for the revised language. These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A7-2

Draft EIR Coordination with Local Agencies Mitigation Measure

Mitigation Measure 3.7-1 stipulates supporting and coordinating with local agencies to reduce regional greenhouse gas emissions. To improve this measure's potential to help reduce greenhouse gas emissions, Sac Metro Air District recommends that the measure provide examples of regional efforts with excellent opportunities for support and coordination.

One example of such an effort is the United States Environmental Protection Agency's (EPA) Climate Pollution Reduction Grants (CPRG) program for the Sacramento region. The CPRG program aims to create regional and statewide plans to combat the effects of climate change and is facilitating a collaborative process that enables several local agencies to identify commonalities in each jurisdiction's respective climate goals and formulate a set of regional priorities that can be scoped and funded to deliver benefits throughout the Sacramento Region. Through this process, Sac Metro Air District engaged residents, local agencies, multiple cities, and seven counties to build the relationships necessary to implement local climate actions. The CPRG steering committee has also invited community-based organizations (CBOs), nonprofits, and other community groups to participate in an Outreach Advisory Committee (OAC) and influence the creation of a fair community engagement strategy. The Sac Metro Air District hopes to continue our strong collaborative partnership with SACOG in meeting our state and federal clean air and climate goals.

Response A7-2

The comment reiterates the intent of Mitigation Measure 3.7-1 to facilitate support and coordination between SACOG and local agencies to reduce GHG emissions. The comment suggests that the measure should provide examples of regional efforts to facilitate support and coordination. The comment provides the example of EPA's Climate Pollution Reduction Grants program for the Sacramento region. In response to this request, the Climate Pollution Reduction Grants program has been added as an example to the text of Mitigation Measure 3.7-1. See Chapter 4, "Revisions to the Draft EIR." These text modifications provide technical edits and clarification to the descriptions of the existing setting provided in the Draft EIR. The changes do not affect the analysis or conclusions provided in the Draft EIR.

Comment A7-3**MTP / SCS Appendix H Conformity Analysis**

The formatting in the MTP/SCS Appendix H Executive Summary section and Introduction section describing the Sacramento area nonattainment areas is unclear and could cause confusion about these areas' designations. To avoid confusion about the name of the Sacramento region federal nonattainment area, designation of the Sutter Buttes area, and "bump up" request, we propose that these sections are revised and reorganized (strike-through indicates text recommended for deletion and underline indicates text recommended for addition):

Revise the first two bullets and sub bullets under the heading "Conformity Requirements" (pg. 1 of Appendix H):

- ▶ *2008 8-Hour Ozone (including the ROG and NOx precursors) ~~Severe-15~~ Nonattainment Areas:*
 - *The Sacramento ~~Metropolitan~~ Federal Nonattainment Area (Sacramento, Yolo and portions of El Dorado, Placer, Sutter, Solano Counties) – Severe-15 and*
 - *The Sutter Buttes Area (Sutter County). The 2008 ozone standards classify the Sutter Buttes Area as an unclassified/attainment area for ozone, effective July 20, 2013.*
- ▶ *2015 8-Hour Ozone (including the ROG and NOx precursors) ~~Serious~~ Nonattainment Areas:*
 - *The Sacramento ~~Metropolitan~~ Federal Nonattainment Area (Sacramento, Yolo and portions of El Dorado, Placer, Sutter, Solano Counties) - Serious, effective August 13, 2021.*
 - ~~*The Sutter Buttes Area (Sutter County). The 2015 ozone standards classify the Sutter Buttes Area as a marginal nonattainment area for ozone, effective June 4, 2018.*~~
 - *An update and concurrent redesignation A voluntary "bump up" request to redesignate this area as Severe is under development has been submitted by the regional air district and is pending EPA action.*
 - *The Sutter Buttes Area (Sutter County). The 2015 ozone standards classify the Sutter Buttes Area as a marginal nonattainment area for ozone, effective June 4, 2018.*

Revise the second sub bullet under the third bullet (PM10):

- ▶ *The ~~First~~ First PM10 Maintenance Plan showed that PM10 and NOx emissions are ~~not~~ significant contributors ~~of to~~ the ambient PM10 concentrations in Sacramento.*

Revise the text under the heading "Years of Analysis" (pg. 10 of Appendix H):

- ▶ *2026 is ~~an attainment~~ a budget year for ozone under the 2015 ozone NAAQS*
- ▶ *2032 is ~~a the proposed budget attainment~~ year for ozone for ~~severe~~ the Sacramento Severe non-attainment areas*
- ▶ *2033 is a proposed ~~attainment~~ budget year for PM10 as ~~part of the final year covered by the Second~~ PM10 Maintenance Plan*

Response A7-3

The comment is related to Appendix H, "Conformity Analysis of the 2025 Blueprint," and does not raise any issues related to adequacy of the Draft EIR. Appendix H has been revised as requested. These text modifications provide technical edits and clarification and do not affect the analysis or conclusions provided in the Draft EIR.

Comment A7-4**Regulatory Framework**

California relies on vehicle emission waivers under the Clean Air Act to enact standards different than the federal standards, but these provisions are facing uncertainty and litigation under the current federal administration as discussed in the DEIR. Please add this context to the Blueprint's Appendix H in your discussion of Transportation Conformity.

Response A7-4

The comment is related to Appendix H, "Conformity Analysis of the 2025 Blueprint," and does not raise any issues related to adequacy of the Draft EIR. See also Chapter 2, "Project and Regulatory Updates," of this Final EIR. As explained in Chapter 2, the uncertainty regarding California's vehicle emissions waivers does not substantially affect the 2025 Blueprint or the analysis presented in the Draft EIR. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A7-5**Conclusion**

Finally, in our correspondence on the Notice of Preparation for the Draft EIR, we recommended consulting the Sac Metro Air District guidance on reviewing projects under the California Environmental Quality Act (CEQA), [The Guide to Air Quality Assessment in Sacramento County](#) (CEQA Guide), in particular the chapter on Programmatic review. We appreciate your thorough use of methods in the CEQA Guide overall in preparing the Draft EIR.

Response A7-5

Sac Metro's concurrence with SACOG's application of the CEQA Guide is noted. The comment does not raise any issues related to the 2025 Blueprint of the adequacy of the Draft EIR.

3.1.2 Comments on the Draft EIR: Tribes

Letter T1 United Auburn Indian Community

Anna Starkey, M.A., RPA, Cultural Regulatory Manager, Tribal Historical Preservation Department
June 10, 2025

Comment T1-1

Thank you for providing the link for the DEIR. I've reviewed the chapter and mitigation measures 3.17-1 and -2 both look good. I also appreciate that you included a sentence about Policy Vibrant-9, which encourages early outreach. For future EIRs, we would like to consult more on the content of the chapter. I appreciate the contemporary context that is included, which is well-written. It would have been nice to include some of the same measures that the Cultural Resources chapter included, such as surveying for the identification of TCRs. And that archaeological resources can also be TCRs and evaluation and treatment would need to be inclusive of Tribes. Tribes are briefly mentioned but deference should be given if the resources is indigenous.

Side note, the Cultural Resources chapter, the section titled regional pre-contact setting, is actually the archaeological setting. All of the information is directly from the analysis of archaeological excavations and are based on archaeological theories. This isn't something that needs to be updated, just noted.

Response T1-1

SACOG initiated consultation with the United Auburn Indian Community (UAIC) on February 6, 2025, pursuant to Section 21080.3.1 of the Public Resources Code, and UAIC requested consultation on February 18, 2025. A meeting was held on March 11, 2025, during which UAIC requested the opportunity to review an administrative draft of the "Tribal Cultural Resources" section of the Draft EIR. An early draft of the "Tribal Cultural Resources" section was transmitted to UAIC on April 11, 2025, and comments were received on April 18, 2025. The Draft EIR reflects input received from UAIC prior to publication. Following receipt of this correspondence, responses and suggested revisions were provided to UAIC in August 2025. No further input was provided. Consultation remained open through September 8, 2025, when UAIC communicated to SACOG the revisions were adequate.

UAIC's support for Mitigation Measures 3.17-1 and 3.17-2, Policy Vibrant-9, and the contemporary context provided in Section 3.17, "Tribal Cultural Resources," as well as the desire to consult more on the content of the chapter for future EIRs, is noted. Mitigation Measure 3.17-3 has been revised in response to the comment to include Tribal survey for identification of tribal cultural resources (TCRs). Chapter 5, "Cultural Resources," has also been revised to

acknowledge that archaeological resources can be TCRs and should be handled as described in the mitigation for TCRs. See Chapter 4 of this Final EIR for the revised language.

Comment T1-2

I wish you would have discussed in advance with us Mitigation Measure 3.17-3: Reduce Visibility or Accessibility of Tribal Cultural Resources. In general, UAIC prefers to have access to TCRs so they can steward them. This measure is not one that we may have agreed to, but I would need to discuss it with THPO Fore for his thoughts on it.

Response T1-2

As described in Response T1-1, the public Draft EIR reflects input received from UAIC through the consultation process. In the early draft of the analysis, Mitigation Measure 3.5-3 was cross-referenced to address the protection of resources in place. In response to comments provided by UAIC, this approach was revised and a mitigation measure that references tribal cultural resources specifically but retains the framework of Mitigation Measure 3.5-3 was added. In response to the additional feedback provided in this comment, Mitigation Measure 3.17-3 has been updated to refine the language regarding the protection of cultural resources to acknowledge the need to retain Tribal access. See Chapter 4 of the Final EIR for the revised language.

Letter T2 Yocha Dehe Wintun Nation

Gayle Totton, Tribal Resources Manager
July 23, 2025

Comment T2-1

We discussed the 2025 Blueprint in Tribal Council yesterday. They would like to consult with SACOG, given the recent passage of the bill allowing infill projects to shortcut the CEQA process. Tribal Council meets on Tuesdays and we can schedule a time for a meeting after August 5.

Please let me know if there is a date that works for you, and who might be attending.

Response T2-1

The comment expresses a desire to consult with SACOG about the new CEQA exemptions that were signed into law in June 2025. The effects of these regulations are described in Chapter 2, "Project and Regulatory Updates," of this Final EIR. In addition, SACOG met with Yocha Dehe Wintun Nation staff as requested to clarify the relationship between the long-range plan and specific regulations referenced in the comment. Although the analysis in the Draft EIR assumes housing development consistent with the forecasts of local jurisdictions, the Draft EIR assumes that other agencies with land use approval authority would lead these endeavors and has, therefore, recognized that the mitigation measures identified in the Draft EIR may not be implemented because SACOG does not have legal authority to impose it on all projects. All impact conclusions in the Draft EIR reflect this condition. As a result, the development of infill housing through the exemption process would not affect the significance of impacts disclosed in this EIR.

Comment T2-2

For our discussion later, here are the provisions I have discussed with Eric and other CR staff. We may want to add to the bullet points on following SB-18 and AB-52 requirements for project specific consultation although "early" has different meanings for tribes and lead agencies/project proponents. AB-52 has conflicting language stating that consultation should start: 1. Prior to releasing an environmental document and 2. Within 14 days of the lead agency approving/initiating the project. The second definition works better as tribes will get to provide input prior to design and prior to the agency deciding what type of environmental document would be appropriate. Not only does it make avoidance (the priority mitigation measure) much more likely and avoids redesign to avoid resources.

Response T2-2

As a follow-up from meeting with SACOG, Yocha Dehe staff provided input to SACOG regarding implementation of the Policy Vibrant-9 related to protection of tribal cultural resources, emphasizing early consultation, and including state and federal agencies in interagency communication and collaboration. In response to input provided, the Policy

Vibrant-9 has been updated to reflect the inclusion of federal agencies. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

3.1.3 Comments on the 2025 Blueprint

Letter BP1 Cynthia Crosby

May 29, 2025

Comment BP1-1

Florin Rd and East Parkway Dr Traffic intersection, streetscape and pedestrian bridge surrounding around bridge and traffic light needs improvement. There is pavement and concrete that looks like roadwork and it is exposed and needs repaired. To maintain the streetscape, pedestrian walk and waiting area before crossing the road before the light changes. It needs to be repaired to make it safer for pedestrians.

Response BP1-1

The comment expresses an opinion that is not directly related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter BP2 Franklin Boulevard Business Association

Michael Bokan, Executive Director

June 5, 2025

Comment BP2-1

The Franklin Boulevard Business District would like to voice our strong support for the inclusion and prioritization of the Franklin Boulevard Complete Street Project (Phases 1, 2, and 3) in the Draft 2025 Blueprint.

This corridor is a vital link for families, workers, small businesses, and transit users across South Sacramento. It has long suffered from unsafe conditions for pedestrians, cyclists, and transit riders. The proposed project will transform Franklin Boulevard from Sutterville Road to 38th Avenue with protected bike lanes, sidewalks, safer crossings, transit amenities, and lighting—all of which are desperately needed.

The FBBA represents 162 property and over 500 plus businesses owners from Franklin Blvd and 12th Ave on the North to Franklin and Turnbridge Drive on the South. Many of the people who live and work along Franklin rely on walking, biking, or public transportation to get where they need to go. These improvements will not only enhance safety but will also promote public health, reduce traffic-related injuries, and support our local businesses by encouraging more foot traffic and improving access.

This project reflects SACOG's values around equity, sustainability, and complete communities. I urge you to retain and prioritize the Franklin Boulevard Complete Street Project in the final Blueprint.

Response BP2-1

The comment expresses support for a transportation project listed in the 2025 Blueprint (Appendix A) and does not raise any issues related to adequacy of the Draft EIR. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter BP3 City of West Sacramento

Jason McCoy
June 18, 2025

Comment BP3-1

Draft 2025 Blueprint / MTP/SCS comment: Page 6 – Who is SACOG – The term “public servant” is demeaning and has a negative connotation implying subservience. Government employees including police officers, fire fighters, planners, etc., are in PUBLIC SERVICE but are not servants. As an example, in the US, we do not refer to government employees in the armed forces as “military servants” and instead we say these government employees are in “military service” because it is derogatory and disrespectful to refer to these or any government employee as a servant. As someone in public service myself, I hear on many, many occasions those hostile to local government negatively refer to employees as servants and bureaucrats. It's crucial to understand that using such language can perpetuate negative stereotypes and contribute to a hostile environment. I recommend changing your description of SACOG staff to be more respectful of the work they do by removing the term “servant.” Thank you.

Response BP3-1

The comment raises concern about specific language used in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. In response to this comment, the introduction to the 2025 Blueprint been updated to refer to “staff.” These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Letter BP4 City of Folsom

Rebecca Neves
July 17, 2025

Comment BP4-1

Please see the attached draft MTIP Amendment list with some additional information and details provided as requested. For the sake of transparency, this is our current best guess at the values/costs associated with the projects as we haven't started environmental or design yet. Minor modifications will be needed as we refine project scope and delivery.

Response BP4-1

The comment provides clarifications to the transportation projects listed in the 2025 Blueprint (Appendix A) and does not raise any issues related to adequacy of the Draft EIR. Appendix A has been updated as appropriate. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Letter BP5 Sam Swenson

July 24, 2025

Comment BP5-1

Draft 2025 Blueprint / MTP/SCS comment: It's disappointing to see a lack of emphasis on expansion of rail and bus services for everyone. Public transit continues to be treated primarily like a solution to simply accommodate the poor. This paradigm lacks vision and blinds SACOG to the advantages of economic development through the expansion fixed rail throughout the community and not just along the existing freeway corridors. Salt Lake City is a great example of how a city can transform through implementation of commuter rail options that go where people live, shop, study, etc. The vision needs to move beyond rush-hour commuting and develop a plan for day-to-day living mobility for everyone. Suggestion: continue light rail from Watt, up Auburn blvd. to American River College. Continue to Greenback. Eastward on Greenback with a transit hub at the Sunrise Mall. Future expansion to continue down Greenback and terminate at the Folsom station. Having a line that cuts through the heart of where people live will lead to more economic redevelopment in established area and permit more residence to travel into the downtown business areas.

Response BP5-1

The comment expresses an opinion about the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint is fiscally constrained and must only plan for investments that the region can reasonably afford by 2050. With inflating project costs, a growing maintenance backlog, and limited sources of revenue, the 2025 Blueprint focuses the \$3 billion available for transit expansion on transit capital projects that are cost effective. This includes some heavy rail and light rail expansions (like to Natomas and Roseville), but largely relies on increased bus frequency and efficiency along Regional Transit Network corridors. Together these investments result in a 200 percent increase in transit service by 2050. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter BP6 Lawrence Geeslin

June 26, 2025

Comment BP6-1

Draft 2025 Blueprint / MTP/SCS comment: The single biggest physical obstacle for us to continue living here is the summer time heat. I would encourage even more attention to green spaces, particularly large areas of trees and water bodies, both of which are known to mitigate heat build up in the local atmosphere through "heat of evaporation" cooling effects. That's all.

Response BP6-1

The comment expresses an opinion that is not directly related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter BP7 Shana Lasensky

July 29, 2025

Comment BP7-1

Draft 2025 Blueprint / MTP/SCS comment: The 2025 SACOG Blueprint inadequately addresses public transit safety, a critical issue for Sacramento's riders. Despite community outreach highlighting safety concerns (Page 43), the plan lacks specific measures to protect passengers from crime, focusing instead on infrastructure maintenance and emissions reduction (Pages 52–59). Women, roughly half the population, frequently feel unsafe traveling alone on transit, as supported by broader studies like the 2016 APTA report. The March 2024 shooting at the University/65th Street light rail station near Folsom Boulevard, which killed one person and injured two, followed by a related carjacking, underscores this gap. While the blueprint allocates \$4 billion for general safety projects (Page 48), it fails to propose targeted interventions like increased security or station enhancements, leaving passengers vulnerable and highlighting the urgent need for robust transit safety measures.

Response BP7-1

The comment expresses an opinion related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter BP8 Ashley Weiss

July 29, 2025

Comment BP8-1

Draft 2025 Blueprint / MTP/SCS comment: Please add installing a roundabout at the existing side-street stop at I-80 northbound ramp to Horseshoe Bar Road. It is a perfect candidate for this safety improvement and it's already a wide intersection.

Response BP8-1

The comment suggests an additional transportation project for the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Transportation projects are identified by the applicable local agencies and prioritized by SACOG through an extensive vetting process. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter BP9 Yolo Transportation District

Autumn Bernstein, Executive Director

July 30, 2025

Comment BP9-1

As the Transportation Management Agency for Yolo County, we have eagerly awaited the draft 2025 Blueprint. Yolo County Transportation District (YoloTD) cares deeply about the intersection of land use and transportation planning and shares SACOG's perspective that land use projects should be planned and implemented with close consideration to transportation impacts (and vice versa). We appreciate your efforts and partnership in developing the 2025 Blueprint. Our comments follow.

General Comments

YoloTD is impressed with the effort and work that SACOG staff put into this plan. The analysis is well done, and the amount of outreach conducted region-wide is laudable. Your staff should be proud.

Rejuvenating Transit

YoloTD suggests rephrasing one strategy in the Rejuvenating Transit section. The third bullet on Page 52 states that the strategy envisions a transit system that, "attracts sufficient passengers to enable the sustainable and efficient land uses envisioned in the Blueprint." Studies conclude that a successful transit system that "attracts sufficient passengers" requires transit-supportive land uses, built environment, and infrastructure. This can occur through dense design, like transit-oriented development, and built at the pedestrian scale with features such as short crossing distances, adequate lighting, and shade. YoloTD recommends rephrasing the bullet to resemble, "is developed alongside sustainable and efficient land uses envisioned in the Blueprint to attract sufficient passengers."

Response BP9-1

The comment suggests revisions to specific language used in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The text on rejuvenating transit in Chapter 4 of the 2025 Blueprint has been revised as requested, and the revision does not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment BP9-2**Case Studies**

YoloTD appreciates the use of local/regional case studies within *Chapter 6: Policies and Implementation Actions*. Should an agency have questions about how to implement a similar policy or program detailed in the 2025 Blueprint, they can contact that agency directly without needing to reach out to your team for help.

One small item of note is how the *US 50: Trip to Green* project is used twice in the plan. This appears to be the only case study referenced more than once. YoloTD recommends either mentioning its reference elsewhere in the plan or using a different case study. That said, if other plans or projects are used more than once as case studies, please disregard this suggestion.

Response BP9-2

The comment suggests revisions to specific language used in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. In response to this comment, the second reference in Chapter 6 under the strategy to

foster mobility solutions has been removed. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment BP9-3

Another small item of note is that a punctuation mark is missing at the end of the Jurisdiction Highlight: El Dorado Trail Extension - Halcon to US 50 example on Page 84.

Response BP9-3

The comment suggests revisions to specific language used in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Chapter 6, under the strategy to build vibrant places, has been revised as suggested. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment BP9-4

Build and Maintain a Safe, Equitable, and Resilient Multi modal Transportation System

YoloTD recommends rephrasing Policy Build-3 to resemble, "Focus roadway expansion grant funding on major bottlenecks that exist today and/or on expansion projects that incentivize development opportunities or projects that either reconfigure roadways to become Complete Streets or provide safe and connected routes for active transportation modes within Established and Center & Corridor communities." Roadway widening only temporarily reduces congestion and incentivizes auto-dependent development. Conversely, roadway narrowing or Complete Street reconfiguration reduces vehicle speeds and improves roadway safety for other users, improving livability and community connectedness while incentivizing development. The current policy phrasing implies roadway widening drives development and therefore should be reframed.

Response BP9-4

The comment suggests revisions to specific language in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Policy Build-3 in the 2025 Blueprint was revised to emphasize compact development, while other policies support and focus on active transportation. These revisions would not result in substantive changes to the 2025 Blueprint with potential to affect the analysis or conclusions in the Draft EIR.

Letter BP10 Antero Rivasplata

August 2, 2025

Comment BP10-1

Draft 2025 Blueprint / MTP/SCS comment: This plan misses. It is internally inconsistent and fails in its most important function - directing future development to infill areas in order to reduce greenhouse gas emissions and by extension vehicle miles travelled (VMT). First, the plan lacks policies to guide local government decision-making. The policies in Chapter 6 are encouraging general bromides about future growth, but do not offer local government specific policies to guide new development to centers/corridors and established communities.

Response BP10-1

The comment expresses an opinion about the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Refer to Section 3.7, "Greenhouse Gas Emissions and Energy," and Section 3.16, "Transportation," of the Draft EIR for discussion of the 2025 Blueprint's effects on GHG emissions and VMT, respectively. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP10-2

Second, this encourages sprawl. Figures 3-5, 3-10, and 3-11 should identify areas where future growth will be encouraged and where it would be discouraged. However, these figures are inconsistent with Figure 3-9 and its accompanying discussion of "opportunity areas." A large part of these vast opportunity areas are subject to flood or fire hazard, and are outside the supposed priority center/corridor and existing communities areas.

Response BP10-2

The comment expresses an opinion about the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. For clarification, each of the figures referenced in the comment are intended to illustrate different components of the plan and existing conditions; these figures are not intended to be consistent. Figure 3.5 is presented in the context of the land use forecast discussion. It shows the “community types” that are used to help illustrate the distribution of growth and the various development contexts across the region. Local land use plans (e.g., adopted general plans, specific plans, and master plans) were categorized into one of five community types based on characteristics of the existing or planned community. Figure 3.10 shows the types of Farmland mapped by the California Department of Conservation, and Figure 3.11 shows the fire and flood hazard zones mapped by the California Department of Forestry and Fire Protection and the Federal Emergency Management Agency, respectively. Figure 3.9 maps opportunity areas produced by California Tax Credit Allocation Committee and the State Department of Housing and Community Development. The Tax Credit Allocation C maps categorize the state’s census tracts by their level of opportunity based on educational, economic, and environmental metrics. The “Opportunity Areas” mapped in Figure 3.9 are not the areas that the 2025 Blueprint identified for growth. See the discussion under “Building More Types of Housing from Missing Middle Homes to Larger Apartments” (pages 37 and 38) of the 2025 Blueprint for further discussion. These independent inputs—planned growth, mapped agricultural resources, mapped fire and flood hazards, and neighborhoods with resources that maximize opportunities for the success of the individuals raised in them—inform the development and implementation of the plan.

No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP10-3

Third, while the plan emphasizes the need for active transportation and improved transit, it fails to provide substantial monetary support to transit and active transportation. Instead, as itemized in Appendix A, the vast majority of funding is being dedicated to new road and freeway projects. Adding HOV lanes and toll lanes does not support transit. Rather, it makes driving more convenient by increasing capacity and inducing more traffic.

Response BP10-3

The comment raises an opinion about the allocation of funding to transportation projects in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint is a fiscally constrained plan and can only include projects that the region can reasonably afford over the next 25 years. The 2025 Blueprint allocates a plurality of funding to transit and the roadway system, on which the transit system is dependent. Within the transit category, there is \$3 billion in planned transit expansions, which will result in a 200 percent increase in transit ridership by 2050. These expansions include frequent bus service on the Regional Transit Network. Some of these buses use the highway system to connect riders between counties and toll lanes provide reliable travel times to keep those buses on schedule. The plan also invests \$5.5 billion in pedestrian and bicycle infrastructure expansions and safety improvements. Together, this \$8.5 billion is greater than the \$7.6 billion the plan invests in expanding roads and highways.

No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP10-4

Fourth, the plan is based on false assumptions. VMT is not going down in the region; it is increasing statewide and in the region, and there is no observational evidence that it will decrease in the future (please don't tell me that your model says otherwise - it is clearly flawed). Traffic congestion is not reduced because more people are working at home. This assumption is not reflected in traffic counts; in fact, congestion appears to be spread across the day. One indicator that this is not true: VMT is increasing; that would not be the case if working from home meant people are driving less.

Response BP10-4

The comment raises an opinion related to the VMT assumptions in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint evaluates VMT for the region if the plan policies, land use

strategies, and transportation projects are implemented; it does not solely evaluate VMT and congestion in the current condition. The plan acknowledges that daily trips would increase with the addition of new people to the region; therefore, the 2025 Blueprint would work to reduce the rate of VMT growth, measured as VMT per capita. Figure 5.2 in the 2025 Blueprint shows current VMT trends and 2025 Blueprint forecasts if the plan is implemented. More details on 2025 Blueprint policies and relationships between land use and transportation integration and VMT by teleworker type can be found in Appendix E, "Plan Performance."

Section 3.16 of the Draft EIR includes a discussion of VMT and evaluates the potential for the 2025 Blueprint to result in a change in per capita VMT that is inconsistent with CARB's 2022 Scoping Plan in Impact 3.16-2 (pages 3.16-39 to 3.16-46). As explained therein:

The impact of the transportation projects and policies in the 2025 Blueprint would result in a decrease in total regional VMT per capita by the year 2050 of 5.5 percent. The region is making progress in VMT reductions through the development of new initiatives, projects, and programs in the 2025 Blueprint, and is not directly interfering with the statewide VMT reductions required to meet the state's climate goals. However, the plan does not clearly establish the necessary level of VMT reductions now forecast as required by the State in CARB's 2022 Scoping Plan. And although the State acknowledges that SACOG and other MPOs cannot meet this need without the collaboration and help of the State itself, as well as local partners, at the time of writing this Draft EIR it is unknown how CARB and other State agencies, through statewide programs or in coordination with local and regional governments, would meet the identified higher VMT reductions. While SACOG stands ready to contribute to this statewide effort, the gap in VMT reductions needed to achieve the State's 2030 and 2050 targets remains. As a result, the potential of the projected land use pattern and planned transportation improvements of the 2025 Blueprint to substantially interfere with achievement of the VMT reductions set forth in the CARB 2022 Scoping Plan at the regional level would be potentially significant.

Letter BP11 Power In Nature

Steve Schweigerdt
August 5, 2025

Comment BP11-1

Draft 2025 Blueprint / MTP/SCS comment: The Blueprint is always an inspiring vision showing vibrant communities and compact growth, but our region has yet to benefit because too many jurisdictions disregard it in favor of sprawl. We've developed 278,000 acres of ag land in just 30 years and have only protected 9% of the land needed for biodiversity and climate resilience in our region. Polling of residents show we want access to open space, parks, and trails but we have no regional vision or plan for that. We are way behind other regions and we need to start creating a Greenprint to go with the Blueprint that prioritizes protecting our special places and making open space accessible to residents. This is a natural pairing that will help us benefit from the ecosystem services natural and working lands provide (\$36B/year in our region!) and improve the livability and resilience of our region.

Response BP11-1

The comment expresses support for the 2025 Blueprint, suggests other programs that could be developed, and does not raise any issues related to adequacy of the Draft EIR. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Letter BP12 City of West Sacramento

Andrea Ouse, AICP, Community Development Director
August 8, 2025

Comment BP12-1

Thank you for the opportunity to review the Draft 2025 Blueprint Plan. The City of West Sacramento has the comments below:

1. Draft 2025 Blueprint, Page 29, Figure 3.7 Green Zone.

The City of West Sacramento updated the Green Zone in 2023. Figure 3.7 shows the City's old Green Zone boundary.

Response BP12-1

The comment suggests an edit to the 2025 Blueprint and does not raise any issues related to the adequacy of the Draft EIR. In response to this comment, Figure 3.7, "Green Zones," has been updated to accurately show the current boundaries of Green Zones for the City of West Sacramento. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment BP12-2

2. Draft 2025 Blueprint, Page 54, Figure 4.7 Managed Lane Network.

Figure 4.7 indicates Dual High Occupancy Toll (HOT 3+ Free) lanes on US50/BUS80 and Single High Occupancy Toll (HOT 3+ Free) by 2035 on I-80 in West Sacramento.

Figure 4.7 suggests the conversion of one general purpose lane conversion to HOT 3+, after the completion of the Yolo 80 Corridor Improvements Project/Yolo 80 Corridor Improvements Project. The City understands there are limited financial resources to build new roads and maintain roadways, and is supportive of any excess net toll revenues reinvested for VMT reducing strategies and for public transit along the corridor. The City looks forward to learning more about dual managed lanes on US50/BUS80, reviewing upcoming studies and toll policies, and coordinating with Caltrans, SACOG, YoloTD, and Capital Area Regional Tolling Authority (CARTA). The City looks forward to future studies that will fully analyze the implications of a second HOT lane on US50/BUS80, including impacts such as increased congestion in the general-purpose lanes, weaving, on- and off-ramp queuing, and emergency evacuation. The City will coordinate to ensure future studies for the second HOT 3+ lanes are consistent with updates and projects in the West Sacramento area as they move forward. The City is open to considering alternatives beyond the conversion of one general purpose lane to a second HOT 3+ free lane, such as a conversion to transit only lane.

Response BP12-2

SACOG acknowledges the City's interest in continued coordination. The comment does not raise any issues related to the adequacy of the Draft EIR. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. SACOG has relayed this comment to Caltrans District 3, who has initiated a Project Initiation Document to analyze the potential benefits and impacts of converting a general purpose lane on I-80.

Comment BP12-3

3. On Appendix A Blueprint Project List, Page 59, SACTrak ID: BP_361 Bryte Park Bike Blvd.

Portions of this project have been completed/are underway with the Bryte Avenue Enhanced Bicycle Route and the North 5th Connectivity and Complete Street Project to provide a low-stress alternative to Sacramento Avenue and the I Street/C Street bridges. Please update this project description to "Complete a recreational loop in West Sacramento's Bryte and Broderick's neighborhoods with bicycle infrastructure for a low-stress alternative route to arterial Sacramento Avenue/C Street." Please carry over any relevant edits to Appendix H Conformity Analysis.

4. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: YOL19376 Clarksburg Branch Line Trail and Bridge – Phase 2 and YOL19553 Great California Delta Trail Regional Connection.**

YOL19376 is a duplicate of YOL19553. Please delete YOL19376. YOL19553 cost of \$446,000 currently shows the programmed cost for preliminary engineering and design. The City estimates a total project cost of \$6,000,000 for YOL19553. Please carry over any relevant edits to Appendix H Conformity Analysis.

5. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: YOL19568 Great California Delta Trail - Clarksburg Branch Line Extension and BP_764 Great California Delta Trail – Clarksburg Branch Line Extension.**

BP_764 is a duplicate of YOL19568. This project is currently in preliminary engineering. Please delete BP_764. Please carry over any relevant edits to Appendix H Conformity Analysis.

6. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: YOL19424 I Street Bridge Deck Conversion and YOL19531 I Street Bridge Deck Conversion for Active Transportation Project.**

YOL19424 is a duplicate of YOL19531. The I Street Bridge Deck Conversion is currently in design. Please remove YOL19424.

Please carry over any relevant edits to Appendix H Conformity Analysis.

7. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: BP_364 Deep Water Ship Channel Levee Trail.**

Please delete. Please carry over any relevant edits to Appendix H Conformity Analysis.

8. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: BP_362 County Rd 136 Levee Trail Gap Closure.**

Please update cost to \$670,000. Please carry over any relevant edits to Appendix H Conformity Analysis.

9. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: BP_363 Davis Road Class 1 Path.**

Please update cost to \$2,200,000. Please carry over any relevant edits to Appendix H Conformity Analysis.

10. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: BP_765 Harbor Blvd. Complete Streets between US50/BUS80 to West Capitol Avenue.**

Please update cost to \$100,000. Please carry over any relevant edits to Appendix H Conformity Analysis.

11. **On Appendix A Blueprint Project List, Page 59, SACTrak ID: BP_365 Lake Washington Blvd Class 1 Path.**

Please update cost to \$1,900,000. Please carry over any relevant edits to Appendix H Conformity Analysis.

12. **On Appendix A Blueprint Project List, Page 60, SACTrak ID: BP_365 Main Drainage Canal Class 1 Trail.**

Please update cost to \$4,200,000. Please carry over any relevant edits to Appendix H Conformity Analysis.

13. **On Appendix A Blueprint Project List, Page 61, SACTrak ID: BP_372 Tule Jake Class 1 Trail.**

Please update cost to \$4,100,000. Please carry over any relevant edits to Appendix H Conformity Analysis.

14. **On Appendix A Blueprint Project List, Page 60, SACTrak ID: YOL19442 Southport Setback Levee Trails.**

Please remove YOL19442. YOL19442 seems to be the planned whole 10-mile trail loop, which has since been broken down into segments (see YOL19550 Southport Levee Recreation Trail; YOL19376 County Rd 136 Levee Trail Gap Closure; BP_363 Davis Road Class 1 Path; etc). Please carry over any relevant edits to Appendix H Conformity Analysis.

15. **On Appendix A Blueprint Project List, Page 61, SACTrak ID: YOL19440 Sycamore Phase 4 and YOL19441 Sycamore Phase 5.**

Descriptions and costs for these projects have been flipped. Sycamore Trail Phase 4 description should be "Design and construct a bicycle and pedestrian undercrossing on the UPRR and SNRR rail ROW from Rice Ave to Yolo Street." Cost \$6,000,000 Cost YOE: \$6,840,000. Sycamore Trail Phase 5 description should be "Design, environmental clearance and construction of the southern extension and terminus of the Sycamore Trail. This

phase would connect at Stone Blvd and include pedestrian crossing improvements across Stone Blvd and provide safe passage through the Barge Canal rail switching yard. Across the Barge Canal waterway a new bike/pedestrian bridge would be constructed and land at the future Arlington Oaks neighborhood park. The trail would continue along a converted Arlington Road and terminate at the intersection of Lake Washington Blvd and Jefferson Blvd." Cost \$4,300,000 Cost YOY: \$4,902,000. Please carry over any relevant edits to Appendix H Conformity Analysis.

16. On Appendix A Blueprint Project List, Page 61, SACTrak ID: BP_374 Village Pkwy N/B Bike Lane Gap Closure.

This project is complete. Please delete. Please carry over any relevant edits to Appendix H Conformity Analysis.

17. On Appendix A Blueprint Project List, Page 61, SACTrak ID: BP_375 West Capitol Ave Protected Bike Lanes and YOL19551 West Capitol Avenue Regional Connection Bicyclist and Pedestrian Safety Improvements.

Please remove BP_375. The protected bike lanes on West Capitol from Yolo Causeway to Jefferson Blvd are part of YOL19551. Please carry over any relevant edits to Appendix H Conformity Analysis.

18. On Appendix A Blueprint Project List, Page 72, SACTrak ID: VAR56182 Yolo Regional Freight Rail Project.

The City is under the impression that the feasibility study has been completed. Please coordinate with Yolo County to further confirm. Please carry over any relevant edits to Appendix H Conformity Analysis.

19. On Appendix A Blueprint Project List, Page 62, SACTrak ID: YOL19288 Yolo Rail Realignment Project Rail Relocation (Phase 2A).

At this time, the City has deemed the Yolo Rail Realignment Project Rail Relocation (Phase 2A) infeasible due to levee impacts and cost/benefit factor and does not currently have plans to advance this project. Please delete. Please carry over any relevant edits to Appendix H Conformity Analysis.

20. On Appendix A Blueprint Project List, Page 62, SACTrak ID: YOL15900 U.S. 50/Jefferson Blvd. Interchange; YOL15670 I-80/Reed Ave. Interchange; and YOL15680 U.S. 50/South River Road.

City has previously requested SACOG update the Lead Agency for these projects to be Caltrans. These projects are within Caltrans right-of-way and the City cannot lead these projects without Caltrans approval. Please coordinate with Caltrans for the status of these projects and carry over any relevant edits to Appendix H Conformity Analysis.

21. On Appendix A Blueprint Project List, Page 62, SACTrak ID: YOL19554 Port Area Infrastructure and Complete Streets Project.

The City has updated the project title from "Port Area Infrastructure and Complete Streets Project" to "Southport to Harbor Roadway Project". The estimated total project cost is \$37,130,000, as shown in the project description. Appendix H Conformity Analysis already lists this project as the Southport to Harbor Roadway Project. Please carry over any other relevant edits to Appendix H Conformity Analysis.

22. On Appendix A Blueprint Project List, Page 62, SACTrak ID: BP_770 US50/BUS80 Community Connectivity Project

The \$2.5M for the US50/BUS80 Community Connectivity Project is included in VAR56304 SACOG Green Means Go: Green Zone Access and Equity Regional Planning Project. Please delete BP_770. Please carry over any relevant edits to Appendix H Conformity Analysis.

23. On Appendix H Conformity Analysis, MPO ID: YOL19456 Washington District Gateway (River Walk North) - Phase 1.

YOL19456 was removed from the 2025 Blueprint Project List because it was complete. Please delete from the Conformity Analysis list.

24. SacTrak ID: YOL19430 Jefferson Streetscape Improvements.

YOL19430 was previously in the MTP/SCS Blueprint Project List. This project is not complete and is currently in design. Please consider including this as amendment priority project with a post-2050 delivery year. Please carry over any relevant edits to Appendix H Conformity Analysis.

25. SacTrak ID: YOL19439 Pioneer Bluff District east-west connections.

YOL19439 was previously on the Blueprint Project List. The City is proceeding with the design phase for this project, which is currently fully funded with local dollars. This project will construct five new east-west local/collector roads, one of which will extend Stone Boulevard from Jefferson Blvd to South River Road. The City anticipates design to be complete by Summer 2027 and if funding is identified, will advance construction in 2028/2029. Please consider this project if deemed appropriate for the Blueprint.

26. Yarbrough Development Roads

The City previously identified to SACOG the major road projects to be developed with the Yarbrough development: 1) Jefferson Blvd widening between Linden Road to Southport Parkway from 2 lanes to 4 lanes and intersection improvements, 2) Jefferson Blvd widening between Southport Parkway to south City limits, and 3) Village Parkway extension from Gregory Avenue to Jefferson Blvd. Based on the Appendix C Land Use Forecast assuming 700 housing units in Yarbrough by 2050, the Jefferson Blvd widening between Linden Blvd to Southport Parkway will be constructed within the Blueprint 2050 timeframe. As part of the Yarbrough Amended and Restated Development Agreement (ARDA), Exhibit J (Traffic Improvements & Funding Commitments) Jefferson Blvd. states Landowner shall construct the widening of Jefferson Boulevard from Linden Road to the Southport Parkway into four (4) lanes. (Eligible for Fee Credit upon City Council approval of this Amended and Restated DA). Timing: Jefferson Improvements to be started upon initial construction of subdivision improvements in first Small Lot Final Map in Phase I and completed prior to the 400th final residential unit inspection in Phase I. The other two segments will also be funded and constructed by the Yarbrough landowner and are likely outside of the Blueprint's 2050 timeframe. Please update the Blueprint as needed.

Response BP12-3

This comment suggests refinements to the list of transportation projects in Appendix A to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Appendix A has been updated as appropriate. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment BP12-4**27. 2025 Blueprint Draft Program EIR, Page 3.16-15, Section Demand Responsive Transit.**

This section states "The City of West Sacramento's service, Via Rideshare, was implemented in January 2024." The City launched and has operated this program since May 2018.

Response BP12-4

The date that the City of West Sacramento began operation of its Via Rideshare services has been corrected in the 2025 Blueprint in response to this comment. See Chapter 4, "Revisions to the Draft EIR." This text modification improves technical accuracy but does not affect the analysis or conclusions provided in the Draft EIR.

Letter BP13 California Air Resources Board

Carey Knecht, Chief, Transportation and Land Use Planning Branch
August 8, 2025

Comment BP13-1

California Air Resources Board (CARB) staff appreciates the opportunity to review and engage with the Sacramento Area Council of Governments (SACOG) staff on the 2025 Blueprint, its draft 2025 Metropolitan Transportation Plan / Sustainable Communities Strategy (Draft SCS). Comprehensive planning that integrates land use and transportation to reduce greenhouse gas emissions is more important than ever. To achieve the State's climate mandates, California needs significant and immediate changes to how we plan, fund, and build our communities and transportation systems. The SACOG SCS plays a critical role in supporting the State's climate efforts as well as local objectives to create an economically vibrant region that responds to the needs of diverse communities and provides clean air for its residents.

CARB staff have reviewed SACOG's Draft SCS to identify whether additional information would be needed to conduct our final SCS evaluation under Senate Bill (SB) 375, after SACOG adopts the final SCS. CARB staff's evaluation of the final SCS will focus on assessing whether SACOG's determination regarding the plan's ability to achieve its greenhouse gas (GHG) emission reduction targets is reasonably supported by the plan, as outlined in the Final Sustainable Communities Strategy Program and Evaluation Guidelines (SCS Evaluation Guidelines). For reference, the following comments are generally organized by the SCS evaluation components as described in the SCS Evaluation Guidelines, which can also be found in CARB's SCS Submittal Package Summary Guide.

Although this letter is focused on policy analyses, it is important to note that CARB's evaluation of the final Metropolitan Transportation Plan (MTP)/SCS is predicated on the technical accuracy of GHG emissions quantification. Early in the SCS development process, SB 375 requires Metropolitan Planning Organizations (MPOs) such as SACOG to submit a technical methodology to CARB.¹ The MPO and CARB staff are then intended to work together until CARB staff conclude that the calculations and quantifications provided would yield accurate estimates of GHG emission reductions. As detailed in a separate letter provided to SACOG staff on August 8, 2025, CARB staff continue to have outstanding concerns about the technical methodology.

¹ Gov. Code, § 65080, subd. (b)(2)(J)(i).

It is critical that CARB staff and SACOG staff continue working together to reach an agreement on SACOG's technical methodology to avoid the risk of quantification issues arising in SACOG's final MTP/SCS. Issues with quantifications that leave CARB staff unable to accept SACOG's determination as to whether its SCS meets GHG emission reduction targets could lead to the need for SCS revisions and further board approvals, the requirement to develop an alternative planning strategy under California Government Code §65080 (b) (2) (I), and/or ineligibility for certain State transportation funds.

Strategy Commitments

CARB's evaluation of SACOG's final SCS determination will assess whether the SCS actions, investments, and commitments support the stated GHG emission reductions and whether there are any risks to achieving those reductions.

1. Policy analysis

Under the SCS evaluation process, CARB staff analyzes whether SCS strategies for meeting the GHG emission reduction targets are supported by key policies, investments, and other commitments to advance plan implementation. CARB staff's policy analysis is organized by four broad categories of strategies: Land Use and Housing, Transportation, Local/Regional Pricing, and New Mobility.

Below are the CARB staff's concerns about the GHG emission reduction strategies as discussed in the Draft SCS and the additional information needed to evaluate the SCS GHG emissions quantification upon final submittal to CARB. In reviewing the Draft SCS, CARB staff tried to identify any additional information that would be needed to evaluate whether the SCS includes sufficient actions and/or investments to support implementation of the strategies detailed in the Draft SCS. In addition, CARB staff looked for whether the SCS outlines the agencies responsible or the authority needed to support implementation of those strategies.

Response BP13-1

The comment provides background about the MTP/SCS review process and does not raise any issues related to adequacy of the Draft EIR. Specific concerns are raised and addressed below.

Comment BP13-2

a) Land Use and Housing Strategies

The Draft SCS outlines ambitious goals to better integrate transportation and land use, with a focus on regional benefits. SACOG's June 15, 2023, technical methodology for the 2025 SCS identifies targeted infill and increased density in transit priority areas as a core GHG reduction strategy for land use. Chapter 5 expands on this with a vision

for compact development, greater housing density, and a jobs-housing mix. Chapter 6 adds supporting policies, including:

- ▶ Advancing legislative and regulatory reform,
- ▶ Continuing Green Means Go,
- ▶ Encouraging local policy changes and monitoring,
- ▶ Aligning transportation and infrastructure investments, and
- ▶ Coordinating phased growth for complete communities.

These supporting policies are critical and some of the most challenging to implement. CARB staff recommends the final SCS include additional detail – such as planned actions, supporting investments, responsible entities, and any needed authorities - to support implementation for the following items.

Encouraging local policy changes and monitoring: CARB staff recommends identifying how local land use and housing policy changes and development is/will be monitored (e.g., at what scale, compared against what forecast, through what medium, how often), and who will be the responsible entity in the final SCS.² In addition, CARB staff recommends that the final SCS submittal include the latest available development monitoring data on the amount of development within the different SCS community types that has occurred since the 2020 SCS.

² Gov. Code, § 65080, subd. (d)(3)(H)

Response BP13-2

The comment provides suggestions related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. See Policy Vibrant-4 in the 2025 Blueprint, which includes evaluation and monitoring. SACOG is committed to monitoring growth over time, reporting on the progress made in implementing the 2025 Blueprint through the Regional Monitoring Program and Dashboard, and adjusting policies and actions accordingly in future planning efforts. SACOG will evaluate providing additional references, where appropriate, to the Regional Monitoring Program and Dashboard. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP13-3

In addition, CARB staff recommends that SACOG consider including in the final SCS what it expects the formal urban service boundary to be in 2035 based on the adopted land use scenario as well as the expected physical boundary of developed land (the boundary of urban growth) in 2035. Specification of these boundaries, ideally including commitments by Local Agency Formation Commissions (LAFCOs), counties, transportation agencies, cities within the SACOG region, and other agencies, can further support the proposed growth pattern and the necessary regional coordination to achieve it.

Response BP13-3

The comment provides suggestions related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint describes anticipated land use patterns (including general use, intensity, and density, as required by statute) and is not intended to predict or establish urban growth boundaries. See the 2025 Blueprint for relevant policies, such as Vibrant-6, which calls for strategically phased growth and the action for coordinating with local agency formation commissions who have a role in coordinating expansion of urbanized footprint of the region. No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP13-4

Aligning transportation and infrastructure investments: CARB staff recommends SACOG include information identifying what policies or programs are, or will be, used to advance coordination of transportation and infrastructure investments that will support more compact development patterns with greater housing density and a

mix of jobs and housing (e.g., in locations that will mitigate the risk of vehicle miles traveled (VMT) growth) and who will be the responsible entity in the final SCS.

Response BP13-4

The comment provides suggestions related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint's Policy Build-3 was revised to emphasize compact development opportunities within Established and Center and Corridor Communities. In addition, there is a corresponding implementation action to work with agencies on grant funding requests that prioritize measures to help manage congestion within the existing regional footprint. Through this action and related land use strategies (e.g., Vibrant-1 and Vibrant-3), SACOG would align and coordinate investments. Please also see Policy Vibrant-5 and the corresponding implementation action that further supports infill development in lower VMT areas. These revisions would provide clarification and would not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment BP13-5

Coordinating phased growth for complete communities: Implementation of the 2025 SCS land use strategy and achievement of the GHG emissions reduction targets depend on coordinated action across multiple jurisdictions and strong local jurisdiction support. SACOG's own analysis and the draft MTP/SCS note that existing local plans allow for significantly more housing and job growth than the region is projected to need. Attachment D4, *"Factors Considered in Updating the MTP/SCS Land Use Forecast,"* highlights that the projects used in the plan as most likely to be built within 20 years are those located in areas with lower VMT and those consistent with prior MTP/SCS and Blueprint plans.³

³ Note: CARB staff assumes the reference to "2012 MTP/SCS" in Attachment D4 is intended to be "2025 MTP/SCS." Please advise us if this assumption is incorrect.

However, CARB staff continues to have questions about SACOG's ability to steer development toward the areas identified for growth in the adopted scenario. Without concrete actions or funding commitments to prioritize these areas, especially in developing communities, excess capacity elsewhere and the ongoing addition of even more development capacity could result in the actual growth pattern diverging from the plan.

Response BP13-5

The comment r addresses the land use assumptions in the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint has been revised to update the reference in attachment D4. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

As explained in the Draft EIR, the planning assumptions used in the 2025 Blueprint do not affect local land use authority or preclude a local jurisdiction from planning and approving growth that is different in terms of total units or geographic extent (California Government Code Section 65080[b][2][K]). The development pattern used in the 2025 Blueprint considers local general plans, spheres of influence, community and specific plans, land division and development codes, and design guidelines, as they guide the type and intensity of future land uses. State and federal policies and regulations are also considered, most notably (but not limited to) those relating to development in floodplains and other natural hazard areas (e.g., fire), federal Clean Water Act of 1972 (33 USC Section 1251 et seq.) and federal Endangered Species Act of 1973 (16 USC Section 1531 et seq.) permit requirements, Transportation Control Measures in air quality plans under the Clean Air Act, and state housing requirements. (See pages 2-5 and 2-6 of the Draft EIR.)

Within the Development Pattern, the regional growth pattern identifies where land use changes would occur. The proposed plan prioritizes growth in existing communities by applying a series of land use strategies to these select geographies to make individual parcels of land more attractive for both development and redevelopment. Many of the land use strategies are aimed at achieving the plan's focused growth strategy to comply with SB 375's GHG emissions reduction mandate. (See Draft EIR page 2-15.) As noted in the comment, SACOG does not have regulatory or approval authority over most future projects in the plan area, including those evaluated in the Draft EIR. SACOG

aims to steer development toward the areas identified for growth in the adopted scenario through established and proposed programs.

Importantly, the latest monitoring data shows growth of housing in Green Zones, locally adopted infill corridors through the region's Green Means Go program, and supports the land use assumptions in the plan. As noted in the 2025 Blueprint, programs like Green Means Go, technical and grant assistance, and other local regulatory reforms already underway are important components of the vision. As described in Chapter 6 of the 2025 Blueprint, SACOG is committed to implementation actions as part of Policy Vibrant-2 and Policy Vibrant-4 to address the comment, including working with member and partner organizations on accelerating infill development and developing solutions to help the region stay on track toward regional housing goals. No further changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP13-6

Therefore, CARB staff recommend that the final SCS strengthen policy Vibrant-6 includes more specific information on the actions, programs, or funding commitments that will improve the likelihood of development occurring within the plan's designated areas for growth in Developing Communities. CARB staff recommend that SACOG add a policy or action to coordinate and engage with jurisdictions on proposed greenfield developments to make clear the development timing and phasing, as well as the VMT reduction strategies of the SCS and how the proposed development could support or weaken SCS implementation. More broadly, CARB staff recommend that SACOG add a policy or action to secure commitments from local agencies to support SCS goals through their land use decisions. Documenting these efforts, including local agency participation and support for these efforts, will help demonstrate progress on implementing the land use strategy.⁴

⁴ SACOG must report on implementation of its most recently adopted SCS starting July 1, 2026. (Gov. Code, § 65080, subd. (d)(3)(H).)

Response BP13-6

The comment provides suggestions related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint's Policy Vibrant-6 was updated with an additional implementation action related to monitoring phased greenfield growth. Related to the request for information on local agencies implementing and supporting SCS goals through their land use decisions and efforts, please note that the 2025 Blueprint has included local jurisdiction highlights throughout the plan in order to provide examples of local actions and to demonstrate the implementation of the Blueprint's strategies. These revisions provide clarification and do not result in substantive changes to the 2025 Blueprint that affect the analysis or conclusions in the Draft EIR.

Comment BP13-7

b) Transportation Strategies

Funding priority for supportive projects: In the evaluation of the 2020 SACOG SCS, CARB staff recommended prioritization of transportation investments that advance SCS implementation and goals. Policy Vibrant-5 in Draft SCS discusses a similar policy for infrastructure investments. However, the policy and related actions do not have a timeline or deliverables. CARB staff recommends the inclusion of additional information in the final SCS with actions and/or investments to support implementation of the strategy, and information about the entities responsible or the authority needed to support implementation.

Response BP13-7

The comment provides suggestions related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Details on specific scope, schedule and deliverables are considered as part of SACOG's development of the Overall Work Program. The 2025 Blueprint is a long-range plan and as such does not typically provide this level of detail. SACOG will keep CARB informed of progress toward meeting plan policies and implementation efforts as part of ongoing coordination on the SCS submittal requirement.

Comment BP13-18

List of projects as assumed in the SCS quantification and calculations: The transportation project list included in the Draft 2025 MTP/SCS does not indicate for all projects what is assumed about the project by 2035 for SCS GHG emission impact quantification and policy analysis purposes. These project specifics, as elements of the modeling that show how SACOG proposes to meet its SB 375 target, are part of the SCS and should be submitted as part of the SCS materials. CARB staff recommends that SACOG's final SCS include additional project assumption information (e.g., the number of lanes for each segment, including "auxiliary" lanes), which lanes if any are managed and the characteristics of the lane management, the timing for the project to come into operation, how these roads differ from existing conditions, which project number each lane addition refers to (for comparison between project mapping and project lists), whether projects involve work on the same segment of roadway across the plan period, and where to obtain additional information if needed). One way to achieve this would be to add additional columns to the draft project list with this information for each project, as appropriate.

Response BP13-8

The comment provides suggestions related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. This comment is noted. The project list indicates whether projects are anticipated to be completed by 2035 or 2050, and Appendix H to the 2025 Blueprint, Conformity Analysis, further provides completion timing by conformity milestone years. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP13-9**c) New Mobility Strategies**

The NextGen-1 policy for shared mobility, NextGen-3 for zero-emission vehicles, and NextGen-5 for intelligent transportation systems (ITS) mention multiple programs intended for use as SB 375 GHG reduction strategies, including local electric vehicle (EV) charging infrastructure, or supply equipment incentives; transportation system management/ITS projects; employer-based trip reduction strategies; bikeshare and carsharing programs; and mobility hubs. However, the Draft SCS does not have details about how these policies will be carried forward.

To enable CARB staff's evaluation of the SCS as well as for transparency and to build the public support and interest that will be required to achieve the ambitious rates of participation, mode shift, and VMT reduction that are forecasted in the off-model GHG calculations submitted to CARB in this Draft SCS, CARB staff recommends the inclusion of additional information in the final SCS with actions and/or investments to support implementation of these strategies and information about the entities responsible or the authority needed to support implementation.

Note that SACOG's overall work program for 2025-2026 does have some information about some of these strategies, such as bike sharing and mobility hubs. To focus CARB staff's analysis and understanding of these implementation actions as they relate to the GHG reduction strategies, CARB staff recommends that this information be included in the final SCS and submittal materials.

Response BP13-9

The comment provides suggestions related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. The 2025 Blueprint is a long-range planning document and is not intended or designed to include the level of program specificity found in an annual work program and budget, as noted in the comment. The plan adequately outlines the broad strategies that the region will use to implement the plan and indicates that implementation is in partnership with state agencies, local agencies, and partners. The implementation actions are intended to cover programs and projects at different scales throughout the region. SACOG acknowledges that the SCS submittal includes tracking implementation analysis and more information on implementation of policies and programs used as part of GHG reduction strategies.

Comment BP13-10**2. Investment analysis**

Under the SCS evaluation process, CARB staff will evaluate whether the planned investments in the project list adopted with the 2025 SCS support the expected GHG emission reductions by 2035. CARB staff will also qualitatively assess the risk of delay in delivering projects that advance SCS goals based on assumed available revenue sources and other factors.

a) Analysis data

As part of our evaluation, CARB staff will analyze total investment by transportation category in the 2025 SCS compared to the 2020 SCS, investment by transportation category as a percentage of total plan investment for both the 2025 SCS and the 2020 SCS, and total investment by category for the 2025 SCS for the period before 2035 (2025 to 2035) and after 2035 (2035 to the horizon year of 2050). CARB staff recommends that the final MTP/SCS submittal include the plan's summary spending data to allow these analyses. Further information on the transportation categories can be found in the *CARB SCS Submittal Package Summary Guide*.

Response BP13-10

The comment is related to the SCS evaluation process. The comment is not directly related to the content of the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. As noted on page 2-26 of the Draft EIR,

The Transportation Project List, included as Appendix A to the 2025 Blueprint, was adopted by the board on November 14, 2024. It includes the following allocation of funding across major project categories:

- ▶ Maintenance and Rehabilitation: \$13.0 billion
- ▶ Road and Highway Capacity: \$7.6 billion
- ▶ Transit Improvements:
- ▶ Transit Capital: \$7.9 billion
- ▶ Transit Operations and Maintenance: \$7.0 billion
- ▶ Bike and Pedestrian Improvements: \$2.0 billion
- ▶ Programs, Safety, System Management, and Operations: \$3.4 billion

No changes have been made to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP13-11**b) Funding through local-option county sales tax measures**

Appendix B discusses funding of plan investments by 2030 with new Placer County and Sacramento County sales tax measures. Tax measures in both counties have been voted on in recent years, and both failed measures included project lists with transportation projects not slated for completion by 2035 in the 2020 MTP/SCS. The Placer County tax measure's project list included Placer Parkway (completion date not mentioned), which could, if passed, have disrupted the current draft plan's implementation since only a small portion of that facility is to be built by 2035 per the current Draft SCS. CARB staff recommend that SACOG consider adding a supporting action to the final SCS that addresses how these local tax measures could help implement the final SCS by prioritizing funding for transportation projects included in the plan that support mode shift, and only funding VMT increasing projects that are already in the plan based on the plan's assumed timing.

Response BP13-11

The comment provides a suggestion related to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. See 2025 Blueprint Policies Invest-6 and Invest-8 and the supporting action for additional information about project funding through local tax measures. No additional changes have been made to the 2025

Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment BP13-12**Conclusion**

The comments in this letter identify initial policy issues and recommendations that are all critical to address prior to submission of the final SCS for CARB's review and determination. Please make supporting information available to CARB in the final 2025 MTP/SCS or technical appendices to aid our final evaluation. CARB staff looks forward to continuing our collaboration with SACOG staff and are committed to working together to address these issues so we can achieve the State's emission reduction goals that we are all working toward.

CARB's final evaluation and ultimate decision to accept or reject SACOG's determination that the 2025 SCS would achieve the GHG emission reduction target for 2035 will reflect a full review of the 2025 SCS, following the SCS Evaluation Guidelines, and is not limited by the issues, recommendations, or information requests contained in this letter. If you have any questions, please contact me at (279) 208-7841 or carey.knecht@arb.ca.gov.

Response BP13-12

This comment is related to the MTP/SCS approval process and does not raise any issues related to adequacy of the Draft EIR. SACOG will provide additional supporting information to CARB in the final 2025 Blueprint submittal.

Letter BP14 Sutter County Development Services

Neal Hay

August 8, 2025

Comment BP14-1

Draft 2025 Blueprint / MTP/SCS comment: Regarding page C3-7 of the land use, please update the Sutter Pointe housing units as follows: With permits issued in early 2026, we expect 1000 housing units by 2030, 2000 housing units by 2035 and 3000 housing units by 2040.

Response BP14-1

The comment suggests updates to the 2025 Blueprint and does not raise any issues related to adequacy of the Draft EIR. Appendix D, "Land Use Forecast Documentation," of the 2025 Blueprint provides information on the land use forecasting process for the plan. The land use forecast is updated each cycle based on new information. At the time of the next comprehensive update, completed permit activity will be reviewed and the land use forecast updated where identified. No changes are required at this time to the 2025 Blueprint or Draft EIR in response to this comment. This comment is acknowledged for the record and will be forwarded to the decision makers for consideration.

4 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

4.1 REVISIONS TO THE EXECUTIVE SUMMARY

To provide clarification, the cross reference on page 3 of the Draft EIR under the heading “Alternatives to the Proposed Project,” is revised as follows:

Original:

A more detailed description of each of these alternatives is provided in Chapter 5, “Alternatives,” followed by a comparative analysis of how well the alternative would achieve the project objectives and the relative level of environmental impact associated with each alternative as compared to implementation of the 2025 Blueprint.

Revised:

A more detailed description of each of these alternatives is provided in Chapter 4, “Alternatives,” followed by a comparative analysis of how well the alternative would achieve the project objectives and the relative level of environmental impact associated with each alternative as compared to implementation of the 2025 Blueprint.

4.2 REVISIONS TO THE AGRICULTURAL RESOURCES SECTION

To provide clarification, the description of the Delta Reform Act on page 3.2-5 of the Draft EIR is revised as follows:

Original:

The Delta Protection Plan, which was enacted by the Delta Stewardship Council, identifies agriculture as the principal land use in the Delta, but indicates that in recent decades the total area of agricultural lands has declined, as has the overall percentage of lands in agricultural use. The Delta Protection Plan states that the continued viability of agriculture in the Delta will require the protection of sufficient farmland and fresh water to support commercially viable operations and provide ways for agriculture to co-exist with habitat restoration.

Revised:

The Delta Plan, which was enacted by the Delta Stewardship Council, identifies agriculture as the principal land use in the Delta, but indicates that in recent decades the total area of agricultural lands has declined, as has the overall percentage of lands in agricultural use. The Delta Plan states that the continued viability of agriculture in the Delta will require the protection of sufficient farmland and fresh water to support commercially viable operations and provide ways for agriculture to co-exist with habitat restoration.

4.3 REVISIONS TO THE AIR QUALITY SECTION

The following edits are made to the text within Table 3.3-3 on pages 3.3-11 and 3.3-12 to update the table with the most current information regarding the Feather River Air Quality Management District's ozone and fine particulate matter (PM_{2.5}) air quality plans:

Original:

Table 3.3-3 Applicable Air Quality Plans for the 2025 Blueprint Plan Area

Pollutant	Ambient Air Quality Standard	Applicable Air Quality Plan
Ozone	NAAQS 8-hour	▶ 1997 (2013 Revisions) Sacramento Regional 8-Hour Ozone Attainment and Reasonable further Progress Plan (EDCAQMD, FRAQMD, PCAPCD, SMAQMD, YSAQMD) ▶ 2008 (2017 Revisions) Sacramento Regional 8-hour Ozone Attainment Plan and Reasonable Further Progress Plan (EDCAQMD, FRAQMD, PCAPCD, SMAQMD, YSAQMD) ▶ 2023 Sacramento Regional Plan for the 2015 70-ppb 8-Hour Ozone Standard
	CAAQS 1-hour and 8-hour	▶ 2003 Triennial Assessment and Plan Update (EDCAQMD) ▶ 2012 Triennial AQAP (FRAQMD) ▶ 2012 Triennial Progress Report (PCAPCD) ▶ 2015 Triennial Report and Air Quality Plan Revision (SMAQMD) ▶ 2012 Triennial Assessment and Plan Update (YSAQMD)
PM ₁₀	NAAQS	▶ 2010 PM₁₀ Implementation/Maintenance Plan and Redesignation Request for Sacramento County (SMAQMD) ▶ Second 10-year PM₁₀ Maintenance Plan for Sacramento County
	CAAQS	▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (EDCAQMD) ▶ Staff Report – SB 656¹ Particulate Matter Emission Reduction Implementation Schedule (FRAQMD) ▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (PCAPCD) ▶ Final Staff Report – SB 656 Assessment and Control Measure Evaluation (SMAQMD) ▶ Staff Report – Implementation of SB 656¹ (YSAQMD)
PM _{2.5}	NAAQS	▶ PM_{2.5}2014 Yuba City-Marysville PM_{2.5} Nonattainment Area Redesignation Request and Maintenance Plan (FRAQMD)
	CAAQS	▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (EDCAQMD) ▶ Staff Report – SB 656¹ Particulate Matter Emission Reduction Implementation Schedule (FRAQMD) ▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (PCAPCD) ▶ Final Staff Report – SB 656¹ Assessment and Control Measure Evaluation (SMAQMD) ▶ Staff Report – Implementation of SB 656¹ (YSAQMD)

Notes: NAAQS = national ambient air quality standards, CAAQS = California ambient air quality standards, EDCAQMD = El Dorado County Air Quality Management District, FRAQMD = Feather River Air Quality Management District, PCAPCD = Placer County Air Quality Management District, SMAQMD = Sacramento Metropolitan Air Quality Management District, YSAQMD = Yolo-Solano Air Quality Management District, SB = Senate Bill, PM₁₀ = respirable particulate matter, PM_{2.5} = fine particulate matter, CARB = California Air Resources Board.

¹ SB 656 (Statutes of 2003) required that CARB developed an approved list of readily available, feasible, and cost-effective control measures that may be employed by air districts to reduce PM₁₀ and PM_{2.5} emissions within an air basin.

Source: CARB 2025e.

Revised:**Table 3.3-3 Applicable Air Quality Plans for the 2025 Blueprint Plan Area**

Pollutant	Ambient Air Quality Standard	Applicable Air Quality Plan
Ozone	NAAQS 8-hour	▶ 1997 (2013 Revisions) Sacramento Regional 8-Hour Ozone Attainment and Reasonable further Progress Plan (EDCAQMD, FRAQMD, PCAPCD, SMAQMD, YSAQMD) ▶ 2008 (2017 Revisions) Sacramento Regional 8-hour Ozone Attainment Plan and Reasonable Further Progress Plan (EDCAQMD, FRAQMD, PCAPCD, SMAQMD, YSAQMD) ▶ 2023 Sacramento Regional Plan for the 2015 70-ppb 8-Hour Ozone Standard
	CAAQS 1-hour and 8-hour	▶ 2003 Triennial Assessment and Plan Update (EDCAQMD) ▶ 2024 Northern Sacramento Valley Planning Area Triennial AQAP (FRAQMD) ▶ 2012 Triennial Progress Report (PCAPCD) ▶ 2015 Triennial Report and Air Quality Plan Revision (SMAQMD) ▶ 2012 Triennial Assessment and Plan Update (YSAQMD)
PM ₁₀	NAAQS	▶ 2010 PM₁₀ Implementation/Maintenance Plan and Redesignation Request for Sacramento County (SMAQMD) ▶ Second 10-year PM₁₀ Maintenance Plan for Sacramento County
	CAAQS	▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (EDCAQMD) ▶ Staff Report – SB 656¹ Particulate Matter Emission Reduction Implementation Schedule (FRAQMD) ▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (PCAPCD) ▶ Final Staff Report – SB 656 Assessment and Control Measure Evaluation (SMAQMD) ▶ Staff Report – Implementation of SB 656¹ (YSAQMD)
PM _{2.5}	NAAQS	▶ Yuba City-Marysville PM_{2.5} Second Maintenance Plan (FRAQMD)
	CAAQS	▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (EDCAQMD) ▶ Staff Report – SB 656¹ Particulate Matter Emission Reduction Implementation Schedule (FRAQMD) ▶ Staff Report – Implementation Schedule for SB 656¹ Measures to Reduce Particulate Matter (PCAPCD) ▶ Final Staff Report – SB 656¹ Assessment and Control Measure Evaluation (SMAQMD) ▶ Staff Report – Implementation of SB 656¹ (YSAQMD)

Notes: NAAQS = national ambient air quality standards, CAAQS = California ambient air quality standards, EDCAQMD = El Dorado County Air Quality Management District, FRAQMD = Feather River Air Quality Management District, PCAPCD = Placer County Air Quality Management District, SMAQMD = Sacramento Metropolitan Air Quality Management District, YSAQMD = Yolo-Solano Air Quality Management District, SB = Senate Bill, PM₁₀ = respirable particulate matter, PM_{2.5} = fine particulate matter, CARB = California Air Resources Board.

¹ SB 656 (Statutes of 2003) required that CARB developed an approved list of readily available, feasible, and cost-effective control measures that may be employed by air districts to reduce PM₁₀ and PM_{2.5} emissions within an air basin.

Source: CARB 2025e.

The following text is added below Table 3.3-5 on page 3.3-14 of the Draft EIR in response to a request from Placer County:

Original:

SMAQMD has also developed a long-term operational mitigation protocol that requires the development of an air quality mitigation plan that reduces operational emissions of NO_x and reactive organic gas (ROG) by a minimum of 15 percent for projects identified in the SIP and 35 percent for projects not identified in the SIP.

The other local air districts in the plan area have developed thresholds of significance and general CEQA guidance that contains recommended mitigation measures, but not to the extent of SMAQMD in terms of specific protocols.

Revised:

SMAQMD has also developed a long-term operational mitigation protocol that requires the development of an air quality mitigation plan that reduces operational emissions of NO_x and reactive organic gas (ROG) by a minimum of 15 percent for projects identified in the SIP and 35 percent for projects not identified in the SIP. The other local air districts in the plan area have developed thresholds of significance and general CEQA guidance that contains recommended mitigation measures, but not to the extent of SMAQMD in terms of specific protocols. PCAPCD manages the Clean Air Grant Program, which allows developers to fund verifiable, surplus emissions reduction projects (e.g., diesel engine replacements, EV infrastructure) that may be credited as mitigation for projects which exceed air pollutant thresholds.

To provide clarification, the text of the second paragraph on page 3.3-22 of the Draft EIR has been revised as follows to correctly attribute the map of historic asbestos mines and other natural occurrences to the California Geological Survey and reference the County-specific maps that have been prepared:

Original:

Areas identified as containing or potentially containing NOA are located throughout the SACOG region, with the greatest concentration being located in El Dorado County. The Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California Map prepared by the US Geological Survey shows the distribution and geologic characteristics of the reported asbestos occurrences in California (El Dorado County 2004). Additionally, an asbestos map of western El Dorado County prepared by the County of El Dorado shows the location of individual parcels and areas in four categories that either contain NOA or are considered to be subject to elevated risk of containing NOA (El Dorado County 2018).

Revised:

Areas identified as containing or potentially containing NOA are located throughout the SACOG region, with the greatest concentration being located in El Dorado County. The Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California Map prepared by the California Geological Survey (Map Sheet 59) shows the distribution and geologic characteristics of the reported asbestos occurrences in California. Additionally, the California Geological Survey has prepared Special Reports that identify the likelihood of NOA for El Dorado, Placer, and Sacramento counties.

The text of the second paragraph under the heading "Significance After Mitigation" describing the significance of Impact 3.3-2: Be Inconsistent with Or Exceed Applicable Thresholds of Significance Established by The Local Air District for Long-Term Operational Criteria Air Pollutant Emissions and Short-Term Construction Criteria Air Pollutant Emissions on page 3.3-47 of the Draft EIR has been revised as follows to address conditions in Placer County:

Original:

At the plan level, the effectiveness of these measures in reducing potential impacts to a less-than-significant level for individual projects that would occur under the 2025 Blueprint cannot be guaranteed, as the possibility remains for projects, despite implementing all feasible mitigation measures, to result in emissions above local thresholds of significance. Project-level environmental analysis would be required to be conducted to ensure that the mitigation measures above would reduce impacts to a less-than-significant level for individual projects. Notably, some air districts in the region (e.g., SMAQMD) also offer the option of paying off-site construction mitigation fees if the recommended actions do not reduce construction emissions to acceptable levels. However, this is not applicable to all air districts in the region.

Revised:

At the plan level, the effectiveness of these measures in reducing potential impacts to a less-than-significant level for individual projects that would occur under the 2025 Blueprint cannot be guaranteed, as the possibility remains for projects, despite implementing all feasible mitigation measures, to result in emissions above local thresholds of significance. Project-level environmental analysis would be required to be conducted to ensure that the mitigation measures above would reduce impacts to a less-than-significant level for individual projects. Notably, some air districts in the region (e.g., SMAQMD) also offer the option of paying off-site construction mitigation fees if the recommended actions do not reduce construction emissions to acceptable levels. In addition, for projects located in Placer County that are unable to reduce operational emissions below thresholds with implementation of all feasible on-site operational measures, off-site mitigation strategies should be considered during project-level CEQA review. For projects within PCAPCD's jurisdiction where operational emissions exceed air pollutant thresholds after implementation of all feasible on-site measures, project proponents should coordinate with PCAPCD to identify opportunities to offset remaining emissions through participation in approved local programs, such as the PCAPCD Clean Air Grant Program. However, this is not applicable to all air districts in the region.

Mitigation Measure 3.3-3 has been revised as follows on pages ES-17 through ES-18 and 3.3-57 through 3.3-58 to clarify the applicability of the measure:

Original:**Mitigation Measure 3.3-3: Conduct a Site-Specific Health Risk Assessment**

Where sensitive land uses or TAC sources meeting CARB's criteria in size and activity (i.e., heavy-duty trucks routes, stationary sources requiring air district permits) would be sited within the minimum CARB-recommended distances, a screening-level HRA, and, if warranted, a site-specific HRA, shall be conducted to determine all feasible mitigation and best practices. Identified feasible mitigations and best practices shall be implemented to reduce receptor cancer risks below 10 in one million or an acute hazard index of less than one. The HRA protocols of the applicable local air districts shall be followed or, where a district/office does not have adopted protocols, the protocol of SMAQMD or CAPCOA shall be followed. Note that the MSAT Protocol only applies to Sacramento County; however, many of the recommendations still apply in other areas. In addition, the MSAT Protocol addresses DPM and other MSATs. Best practices shall be applied as recommended and applicable, to reduce the impact to a less-than-significant level where feasible. The HRA should give particular attention to the nature of the receptor, recognizing that some receptors are particularly sensitive (e.g., schools, day care centers, assisted living and senior centers, and hospitals) and may require special measures. Examples of best practices that studies have suggested to be effective include:

- ▶ install, operate, and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13, a Micro-Particle Performance Rating (MPR) of at least 1500, or Filter Performance Rating (FPR) of at least 10 (which is equivalent to an MPR of 1500), and includes either high efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85 percent or higher;
- ▶ install passive (drop-in) electrostatic filtering systems, especially those with low air velocities (i.e., 1 mile per hour [mph]), as a part of the HVAC project HVAC system(s);
- ▶ maintain, repair, and/or replace the HVAC system on an ongoing and as needed basis or prepare an operation and maintenance manual for the HVAC system and the filter, for inclusion in the Covenants, Conditions and Restrictions (CC&Rs) for residential projects and a separate homeowners manual;
- ▶ orient air intakes away from TAC sources or provide shields or buffers to the maximum extent possible; maintain a vegetative barrier between new residential units consisting of tree species with year-round foliage and a porosity of 20 or 40 percent wherever feasible; and

- use tiered tree planting between roadways and sensitive receptors wherever feasible, using native, needled (coniferous) species, ensure a permanent irrigation source, and provide permanent funding to maintain and care for the trees.

Additionally, implementing agencies should contact the applicable air district and/or CAPCOA for the most current list of applicable best practices for limiting exposure of sensitive receptors to substantial TAC concentrations consistent with the CARB Handbook and MSAT Protocol Guidance Document.

Revised:

Mitigation Measure 3.3-3: Conduct a Site-Specific Health Risk Assessment

Where sensitive land uses or TAC sources meeting CARB's criteria in size and activity (i.e., heavy-duty trucks routes, stationary sources requiring air district permits) would be sited within the minimum CARB-recommended distances, and there is reason to presume that the project would create or exacerbate impacts associated with TACs, a screening-level HRA, and, if warranted, a site-specific HRA, shall be conducted to determine all feasible mitigation and best practices. Identified feasible mitigations and best practices shall be implemented to reduce receptor cancer risks below 10 in one million or an acute hazard index of less than one. The HRA protocols of the applicable local air districts shall be followed or, where a district/office does not have adopted protocols, the protocol of SMAQMD or CAPCOA shall be followed. Note that the MSAT Protocol only applies to Sacramento County; however, many of the recommendations still apply in other areas. In addition, the MSAT Protocol addresses DPM and other MSATs. Best practices shall be applied as recommended and applicable, to reduce the impact to a less-than-significant level where feasible. The HRA should give particular attention to the nature of the receptor, recognizing that some receptors are particularly sensitive (e.g., schools, day care centers, assisted living and senior centers, and hospitals) and may require special measures. Examples of best practices that studies have suggested to be effective include:

- install, operate, and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13, a Micro-Particle Performance Rating (MPR) of at least 1500, or Filter Performance Rating (FPR) of at least 10 (which is equivalent to an MPR of 1500), and includes either high efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85 percent or higher;
- install passive (drop-in) electrostatic filtering systems, especially those with low air velocities (i.e., 1 mile per hour [mph]), as a part of the HVAC project HVAC system(s);
- maintain, repair, and/or replace the HVAC system on an ongoing and as needed basis or prepare an operation and maintenance manual for the HVAC system and the filter, for inclusion in the Covenants, Conditions and Restrictions (CC&Rs) for residential projects and a separate homeowners manual;
- orient air intakes away from TAC sources or provide shields or buffers to the maximum extent possible; maintain a vegetative barrier between new residential units consisting of tree species with year-round foliage and a porosity of 20 or 40 percent wherever feasible; and
- use tiered tree planting between roadways and sensitive receptors wherever feasible, using native, needled (coniferous) species, ensure a permanent irrigation source, and provide permanent funding to maintain and care for the trees.

Additionally, implementing agencies should contact the applicable air district and/or CAPCOA for the most current list of applicable best practices for limiting exposure of sensitive receptors to substantial TAC concentrations consistent with the CARB Handbook and MSAT Protocol Guidance Document.

To clarify the applicability of Mitigation Measure 3.3-3, the following language is added to the last paragraph of the "Significance After Mitigation" section on page 3.3-57:

Original:

If an implementing agency adopts these mitigation measures, Impact 3.3-3 may be reduced. However, at the plan level, the effectiveness of these measures in reducing potential impacts to a less-than-significant level for individual projects that would occur under the 2025 Blueprint cannot be guaranteed. This is because the possibility remains for individual projects, despite implementing all feasible measures recommended in a site-specific HRA, to continue to result TAC emissions and health risks above local thresholds of significance. In this scenario, the lead agency would be responsible for determining appropriate action in regard to project implementation. For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the impact to less than significant. However, SACOG cannot require the implementing agency to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation. Therefore, this impact would be **significant and unavoidable**.

Revised:

If an implementing agency adopts these mitigation measures, Impact 3.3-3 may be reduced. However, at the plan level, the effectiveness of these measures in reducing potential impacts to a less-than-significant level for individual projects that would occur under the 2025 Blueprint cannot be guaranteed. This is because the possibility remains for individual projects, despite implementing all feasible measures recommended in a site-specific HRA, to continue to result TAC emissions and health risks above local thresholds of significance. In this scenario, the lead agency would be responsible for determining appropriate action in regard to project implementation. In addition, lead agencies can only require preparation of HRAs through mitigation where there is reason to presume that the project would create or exacerbate impacts associated with TACs. Where no such evidence exists, this element of the mitigation measure may not be enforceable, although approval of the project may still be conditioned on a similar requirement. For projects proposing to streamline environmental review where the project would either create or exacerbate impacts associated with TACs, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the impact to less than significant. However, SACOG cannot require the implementing agency to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation. Therefore, this impact would be **significant and unavoidable**.

4.4 REVISIONS TO THE BIOLOGICAL RESOURCES SECTION

To provide clarification, the language on pages 3.4-5 of the Draft EIR describing the Sacramento-San Joaquin Delta Reform Act is revised as follows:

Original:

In November 2009, the California Legislature enacted the Sacramento-San Joaquin Delta Reform Act (Delta Reform Act) (California Water Code Section 10610 et seq.), also known as SB 1 (Stats. 2009, 7th Ex. Sess., ch. 5) (SB X7-1), one of several bills passed at that time related to water supply reliability, ecosystem health, and the Delta.

Revised:

In November 2009, the California Legislature enacted the Sacramento-San Joaquin Delta Reform Act of 2009 (Delta Reform Act) (California Water Code Section 85000 et seq.), also known as SB 1 (Stats. 2009, 7th Ex. Sess., ch. 5) (SB X7-1), one of several bills passed at that time related to water supply reliability, ecosystem health, and the Delta.

To provide clarification, the language on pages 3.4-6 of the Draft EIR describing the Sacramento-San Joaquin Delta Reform Act is revised as follows:

Original:

The Delta Reform Act expressly provides that “covered actions” do not include the following: (1) regional transportation plans (RTPs), such as this proposed 2025 Blueprint; and (2) plans, programs, projects, activities (and any infrastructure necessary to support those plans, programs, projects, or activities) within the secondary zone of the Delta that SACOG has determined is consistent with the proposed 2025 Blueprint (California Water Code Section 85057.5). However, the DSC reviews any plan that includes land within the Delta zones, whether or not it is a covered action. Metropolitan planning organizations that have a planning area crossing these boundaries are required to follow a this consultation procedure with the DSC. This procedure includes early coordination to determine consistency of a proposed RTP with the Delta Plan.

Revised:

The Delta Reform Act expressly provides that “covered actions” do not include the following: (1) regional transportation plans (RTPs), such as this proposed 2025 Blueprint; and (2) plans, programs, projects, activities (and any infrastructure necessary to support those plans, programs, projects, or activities) within the secondary zone of the Delta that SACOG has determined is consistent with the proposed 2025 Blueprint (California Water Code Section 85057.5). However, the Delta Reform Act directs the Council to review and provide timely advice to local and regional planning agencies regarding the consistency of local and regional planning documents, including sustainable communities strategies (SCS) with the Delta Plan (Wat. Code section 85212.) Metropolitan planning organizations that have a planning area crossing these boundaries are required to follow this consultation procedure with the DSC. This procedure includes early coordination to determine consistency of a proposed SCS with the Delta Plan.

To provide clarification, language on page 3.4-7 of the Draft EIR describing local regulations is revised as follows:

Original:

Placer County Conservation Program

On September 1, 2020, the Placer County Board of Supervisors adopted the Placer County Conservation Program (PCCP) (Placer County 2020). The goal of the PCCP is to provide an effective framework to protect, enhance, and restore the natural resources in specific areas of western Placer County, while streamlining environmental permitting for covered activities. The PCCP Plan Area encompasses approximately 201,000 acres in western Placer County and specific conservation activity areas in neighboring Sutter County, of which 50,000 to 60,000 acres would become part of a reserve system. The PCCP comprises three separate but complementary components, described below.

Revised:

Placer County Conservation Program

Placer County has adopted the Placer County Conservation Program (PCCP), which includes an HCP/NCCP and the Western Placer County Aquatic Resources Program (CARP). Covering approximately 201,000 acres, the PCCP establishes a regional reserve system and mitigation framework that provides streamlined environmental permitting and compliance with ESA, CESA, and CWA. The PCCP also integrates in-lieu fee mechanisms, monitoring protocols, and adaptive management strategies to ensure long-term conservation outcomes.

In response to a comment from Placer County, the following text was added as the last paragraph in the “Methodology” section in Section 3.4.3, “Environmental Analysis,” on page 3.4-31 of the Draft EIR:

For individual projects that are within an HCP, NCCP, CARP, or ILF Program area, the implementing agency should review the specific program that applies to their project area to see if there are any opportunities to streamline project implementation, if the program provides guidance on how to incorporate the CEQA process into the program application process, and how to incorporate the program’s measures (e.g., conservation measures, avoidance measures) as CEQA mitigation. If this is not laid out in the program, the implementing agency should contact the administering entity of the program and request guidance on how

to do so. Projects within a program area of an HCP, NCCP, CARP, or ILF Program that comply with the program's requirements may be considered to have fulfilled CEQA mitigation obligations for the program's covered species and habitats.

To provide clarification, the first sentence of Mitigation Measure 3.4-1 on pages ES-20 through ES-21 and 3.4-34 of the Draft EIR is revised as follows:

Original:

Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment

Prior to initiation of construction or other ground disturbing activities the implementing agency will conduct, or require an applicant to conduct, a preliminary biological analysis for the project site that will include review of Section 3.4.2, "Environmental Setting," Appendix C-2, Appendix C-3, and any relevant HCP/NCCP as well as current queries of CNDDDB, CNPS Inventory, and USFWS IPaC, and a reconnaissance-level survey of the project site.

Revised:

Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment

Prior to initiation of construction or other ground disturbing activities the implementing agency will conduct, or require an applicant to conduct, a preliminary biological analysis for the project site that will include review of Section 3.4.2, "Environmental Setting," Appendix C-2, Appendix C-3, any relevant HCP, NCCP, CARP, or ILF Program as well as current queries of CNDDDB, CNPS Inventory, and USFWS IPaC, and a reconnaissance-level survey of the project site.

To provide clarification to the avoidance and minimization measures in Mitigation Measure 3.3-4, language of the first bullet point under the "California Red-Legged Frog" subheading on pages ES-24 and 3.4-36 of the Draft EIR is revised as follows:

Original:

California Red-Legged Frog

- ▶ If habitat potentially suitable for California red-legged frog is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California red-legged frog within the area of impact no more than 2 weeks before commencement of project construction activities.

Revised:

California Red-Legged Frog

- ▶ If habitat potentially suitable for California red-legged frog is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California red-legged frog within the area of impact, which will be conducted in accordance with the *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (USFWS 2005) protocol no more than one year prior to the commencement of project construction activities. Consultation with USFWS should be conducted as soon as possible during the early planning stages of an individual project.

To provide clarification to the avoidance and minimization measures in Mitigation Measure 3.3-4, language of the first bullet point under the "California Tiger Salamander" subheading on pages ES-26 and 3.4-37 of the Draft EIR is revised as follows:

Original:

California Tiger Salamander

- ▶ If habitat potentially suitable for California tiger salamander is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California tiger salamander within the area of impact no more than 2 weeks before commencement of project construction activities.

Revised:**California Tiger Salamander**

- ▶ If habitat potentially suitable for California tiger salamander is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California tiger salamander within the area of impact, which will be conducted in accordance with the *Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander* (USFWS and CDFG 2003) protocol no more than one year prior to the commencement of project construction activities. Consultation with USFWS and CDFW should be conducted as soon as possible during the early planning stages of an individual project.

To provide clarification to the avoidance and minimization measures in Mitigation Measure 3.3-4, language of the first bullet point under the "Giant Garter Snake" subheading on pages ES-30 and 3.4-40 of the Draft EIR is revised as follows:

Giant Garter Snake

- ▶ If habitat potentially suitable for giant garter snake is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist to conduct a field investigation to delineate giant garter snake aquatic habitat within the area of impact and adjacent areas within 300 feet of the area of impact. Giant garter snake aquatic habitat includes agricultural ditches.

Revised:**Giant Garter Snake**

- ▶ If habitat potentially suitable for giant garter snake is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist to conduct a field investigation to delineate giant garter snake aquatic habitat within the area of impact and adjacent areas within 300 feet of the area of impact. Giant garter snake aquatic habitat includes agricultural ditches. Consultation with USFWS and CDFW should be conducted as soon as possible during the early planning stages of an individual project.

4.5 REVISIONS TO THE CULTURAL RESOURCES SECTION

To provide clarification, Mitigation Measure 3.5-2 on pages ES-58 through ES-51 and 3.5-32 through 3.5-33 of the Draft EIR is revised to add the following bullet point to the end of the list of measures that shall be implemented to address site-specific impacts:

Original:

Mitigation Measure 3.5-2: Conduct Project-Specific Archaeological Resource Studies and Identify and Implement Project-Specific Mitigation

Measures that shall be implemented to address site-specific impacts, include, but are not limited to, the following:

- ▶ A records search at the appropriate Information Center of the CHRIS shall be conducted by a qualified archaeologist (36 CFR Section 61) as part of the appropriate project/environmental review of individual projects to determine whether the project area has been previously surveyed and whether archaeological resources were identified.
- ▶ In the event the records indicate that no previous survey has been conducted or the survey did not meet current professional standards or regulatory guidelines, the qualified archaeologist (36 CFR Section 61) or the Information Center shall make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources and current professional standards or regulatory guidelines.

- ▶ If a survey is considered warranted, the archaeological study of the project area by a qualified archaeologist shall include conducting a field survey, necessary background research, a Sacred Lands search by the NAHC and outreach to local Native Americans identified by the NAHC, consultation with local historical societies, museums or other interested parties as relevant, and an archaeological survey report. The confidential report shall document the results of the survey and the cultural context, assess the federal, state, or local significance of precontact or historic-era archaeological resources that may potentially be directly or indirectly impacted by project activities, provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California DPR series 523 forms. Management recommendations may include additional studies to evaluate identified sites, treatment for documented historical resources, or archaeological monitoring during ground-disturbing construction activities at locations determined by the archaeologist to be sensitive for subsurface cultural resource deposits, including local Native American monitors if sensitive for precontact resources. The final confidential report and DPR forms would be filed by the archaeologist with the CHRIS. Recommended treatment for resources identified in the report should be implemented.
- ▶ If no archeological resources are identified in the Archeological Survey Report that may be directly or indirectly impacted by project activities, mitigation is complete as there would be no adverse change to documented archeological resources.
- ▶ When a project would impact a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource or an archaeological nature (State CEQA Guidelines Section 15064.5(c)(1)) or unique archaeological resource (PRC Section 21083.2(g)). If archaeological sites identified in the project area are considered potentially significant, the project sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources eligibility for listing in the CRHR, NRHP, local register, or as a unique archaeological resource and to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project area, and on the integrity of the resource. If a site to be tested is precontact, local tribal representatives should be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.
- ▶ If significant archaeological resources that meet the definition of historical resources of an archaeological nature or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place (State CEQA Guidelines Section 15126.4(b); PRC Section 21083.2). Preservation in place may be accomplished by, but is not limited to, avoidance by project design, incorporation within parks, open space or conservation easements, covering with a layer of sterile soil, or similar measures. If preservation in place is feasible, mitigation is complete. Additionally, where the implementing agency determines that an alternative mitigation method is superior to in-place preservation, the project sponsor and/or implementing agency may implement such alternative measures.
- ▶ When preservation in place or avoidance of historical resources of an archaeological nature or unique archaeological resources are infeasible, data recovery through excavation shall be required (State CEQA Guidelines Section 15126.4(b)). Data recovery would consist of approval of a Data Recovery Plan and archaeological excavation of an adequate sample of site contents so that research questions applicable to the site can be addressed. For precontact sites, local tribal representatives should be afforded the opportunity to monitor the ground-disturbing activities. If only part of a site would be impacted by a project, data recovery shall only be necessary for that portion of the site. Data recovery shall not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Confidential studies and reports resulting from the data recovery shall be deposited with the appropriate CHRIS Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions

of Section 7050.5 Health and Safety Code. Mitigation may include curation for artifacts removed during data recovery excavation.

- ▶ If archaeological sites are discovered during construction, all work near the find shall be halted and the project sponsor and/or implementing agency shall follow the steps described under State CEQA Guidelines Section 15064.5(f), including an immediate evaluation of the find by a qualified archaeologist (36 CFR Section 61) and implementation of avoidance measures or appropriate mitigation if the find is determined to be a historical resource of an archaeological nature or unique archaeological resource. Consultation with or affording local tribal representatives the opportunity to monitor mitigative treatment may be appropriate. Should the find include human remains, the remains shall be treated in accordance with the provisions of Section 7050.5 of the Health and Safety Code. During evaluation or mitigative treatment, ground disturbance and construction work could continue on other parts of the project area.

Revised:

Mitigation Measure 3.5-2: Conduct Project-Specific Archaeological Resource Studies and Identify and Implement Project-Specific Mitigation

Measures that shall be implemented to address site-specific impacts, include, but are not limited to, the following:

- ▶ A records search at the appropriate Information Center of the CHRIS shall be conducted by a qualified archaeologist (36 CFR Section 61) as part of the appropriate project/environmental review of individual projects to determine whether the project area has been previously surveyed and whether archaeological resources were identified.
- ▶ In the event the records indicate that no previous survey has been conducted or the survey did not meet current professional standards or regulatory guidelines, the qualified archaeologist (36 CFR Section 61) or the Information Center shall make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources and current professional standards or regulatory guidelines.
- ▶ If a survey is considered warranted, the archaeological study of the project area by a qualified archaeologist shall include conducting a field survey, necessary background research, a Sacred Lands search by the NAHC and outreach to local Native Americans identified by the NAHC, consultation with local historical societies, museums or other interested parties as relevant, and an archaeological survey report. The confidential report shall document the results of the survey and the cultural context, assess the federal, state, or local significance of precontact or historic-era archaeological resources that may potentially be directly or indirectly impacted by project activities, provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California DPR series 523 forms. Management recommendations may include additional studies to evaluate identified sites, treatment for documented historical resources, or archaeological monitoring during ground-disturbing construction activities at locations determined by the archaeologist to be sensitive for subsurface cultural resource deposits, including local Native American monitors if sensitive for precontact resources. The final confidential report and DPR forms would be filed by the archaeologist with the CHRIS. Recommended treatment for resources identified in the report should be implemented.
- ▶ If no archeological resources are identified in the Archeological Survey Report that may be directly or indirectly impacted by project activities, mitigation is complete as there would be no adverse change to documented archeological resources.
- ▶ When a project would impact a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource or an archaeological nature (State CEQA Guidelines Section 15064.5(c)(1)) or unique archaeological resource (PRC Section 21083.2(g)). If archaeological sites identified in the project area are considered potentially significant, the project

sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources eligibility for listing in the CRHR, NRHP, local register, or as a unique archaeological resource and to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project area, and on the integrity of the resource. If a site to be tested is precontact, local tribal representatives should be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.

- ▶ If significant archaeological resources that meet the definition of historical resources of an archaeological nature or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place (State CEQA Guidelines Section 15126.4(b); PRC Section 21083.2). Preservation in place may be accomplished by, but is not limited to, avoidance by project design, incorporation within parks, open space or conservation easements, covering with a layer of sterile soil, or similar measures. If preservation in place is feasible, mitigation is complete. Additionally, where the implementing agency determines that an alternative mitigation method is superior to in-place preservation, the project sponsor and/or implementing agency may implement such alternative measures.
- ▶ When preservation in place or avoidance of historical resources of an archaeological nature or unique archaeological resources are infeasible, data recovery through excavation shall be required (State CEQA Guidelines Section 15126.4(b)). Data recovery would consist of approval of a Data Recovery Plan and archaeological excavation of an adequate sample of site contents so that research questions applicable to the site can be addressed. For precontact sites, local tribal representatives should be afforded the opportunity to monitor the ground-disturbing activities. If only part of a site would be impacted by a project, data recovery shall only be necessary for that portion of the site. Data recovery shall not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Confidential studies and reports resulting from the data recovery shall be deposited with the appropriate CHRIS Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code. Mitigation may include curation for artifacts removed during data recovery excavation.
- ▶ If archaeological sites are discovered during construction, all work near the find shall be halted and the project sponsor and/or implementing agency shall follow the steps described under State CEQA Guidelines Section 15064.5(f), including an immediate evaluation of the find by a qualified archaeologist (36 CFR Section 61) and implementation of avoidance measures or appropriate mitigation if the find is determined to be a historical resource of an archaeological nature or unique archaeological resource. Consultation with or affording local tribal representatives the opportunity to monitor mitigative treatment may be appropriate. Should the find include human remains, the remains shall be treated in accordance with the provisions of Section 7050.5 of the Health and Safety Code. During evaluation or mitigative treatment, ground disturbance and construction work could continue on other parts of the project area.
- ▶ If archaeological material that is potentially indigenous in nature (e.g., stone or bone tools, fire affected rock, darkened "midden" soil) is discovered during survey or construction, the qualified archaeologist and the project sponsor and/or implementing agency shall contact the culturally and geographically affiliated Tribe. Mitigation Measure 3.17-2, Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources and Evaluate Discovered Resource, shall be implemented.

4.6 REVISIONS TO THE GREENHOUSE GAS EMISSIONS AND ENERGY

The last sentence of the first paragraph under the “City of Roseville” subheading within the environmental setting on page 3.7-13 of the Draft EIR has been removed to provide the most current information on energy suppliers and sources, as follows:

Original:

The City of Roseville supplies its own electrical service to its residents through Roseville Electric, a municipal-owned utility. The City serves more than 53,000 residential and business customers. Roseville Electric offers rebates to customers for energy-efficient air conditioners, freezers, refrigerators, pool pumps, sun window screens, whole house fans, and solar energy systems. Customers can also receive credit on their bill for enrolling in the Power Partners program to cycle their central air conditioning compressor on and off during high energy demand times in the summer.

Revised:

The City of Roseville supplies its own electrical service to its residents through Roseville Electric, a municipal-owned utility. The City serves more than 53,000 residential and business customers. Roseville Electric offers rebates to customers for energy-efficient air conditioners, freezers, refrigerators, pool pumps, sun window screens, whole house fans, and solar energy systems.

In response to a comment from the Sacramento Metropolitan Air Quality Management District recommending inclusion of example programs that provide opportunities to support GHG reduction, Mitigation Measure 3.7-1 on pages ES-63 and 3.7-22 of the Draft EIR is revised as follows:

Original:

Mitigation Measure 3.7-1: Coordinate with and Support Local Agencies within the Plan Area to Reduce Regional GHGs from All Sectors

SACOG, in partnership with air districts within the plan area, shall work with the counties and cities within the plan area to adopt qualified GHG reduction plans (e.g., CAPs), develop GHG-reducing planning policies, and implement local climate initiatives, with the ultimate completion date to be achieved by the MTP/SCS’s horizon year. These reductions can be achieved through a combination of programs, including zero net energy in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, and other measures. Notably, the development and implementation of GHG reduction plans would ultimately occur at the discretion of local agencies, counties, and municipalities. Nevertheless, SACOG shall contribute relevant data and protocols to assist in the development of inventories, forecasts, and GHG reduction strategies.

Revised:

Mitigation Measure 3.7-1: Coordinate with and Support Local Agencies within the Plan Area to Reduce Regional GHGs from All Sectors

SACOG, in partnership with air districts within the plan area, shall work with the counties and cities within the plan area to adopt qualified GHG reduction plans (e.g., CAPs), develop GHG-reducing planning policies, and implement local climate initiatives, with the ultimate completion date to be achieved by the MTP/SCS’s horizon year. EPA’s Climate Pollution Reduction Grants (CPRG) program may be utilized to fund such plan developments as the program provides nearly \$5 billion in grants to states, local governments, tribes, and territories to develop and implement plans for reducing GHG emissions. These reductions can be achieved through a combination of programs, including zero net energy in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, and other measures. Notably, the development and implementation of GHG reduction plans would ultimately occur at the discretion of local agencies, counties, and municipalities. Nevertheless, SACOG shall contribute relevant data and protocols to assist in the development of inventories, forecasts, and GHG reduction strategies.

The text of Mitigation Measure 3.7-2 on pages ES-63 and 3.7-25 of the Draft EIR has been modified as follows to recognize and incorporate local and state-endorsed GHG mitigation strategies into Blueprint implementation:

Original:

Mitigation Measure 3.7-2: Implement All Feasible On- and Off-Site Mitigation Measures to Reduce GHG Emissions Below a Lead Agency–Approved Threshold of Significance

The applicable lead agency can and should implement, where necessary and feasible to address site-specific construction climate change impacts, the following measures to reduce construction GHG emissions below applicable air district thresholds, where they exist:

- ▶ Project proponents shall require its contractors to restrict the idling of on- and off-road diesel equipment to no more than 5 minutes while the equipment is on-site in compliance with California's Regulation for In-Use-Offroad Diesel Fueled Fleets.
- ▶ Project proponents of new facilities shall implement waste, disposal, and recycling strategies (i.e., 10 percent recycled content for Tier 1 and 15 percent recycled content for Tier 2) in accordance with the voluntary measures for non-residential land uses contained in Section A5.405.4 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction.
- ▶ Project proponents of new facilities shall achieve or exceed the enhanced Tier 2 target for nonresidential land uses of recycling or reusing 80 percent of the construction waste as described in Section A5.408 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction.
- ▶ Project proponents shall require that all diesel-powered, off-road construction equipment meet EPA's Tier 3 or Tier 4 emissions standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road equipment as it becomes available.
- ▶ Project proponents shall implement a program that incentivizes construction workers to carpool, and/or use public transit or electric vehicles to commute to and from the project site.

Revised:

Mitigation Measure 3.7-2: Implement All Feasible On- and Off-Site Mitigation Measures to Reduce GHG Emissions Below a Lead Agency–Approved Threshold of Significance

The applicable lead agency can and should implement, where necessary and feasible to address site-specific construction climate change impacts, the following measures to reduce construction GHG emissions below applicable air district thresholds, where they exist:

- ▶ Project proponents shall require its contractors to restrict the idling of on- and off-road diesel equipment to no more than 5 minutes while the equipment is on-site in compliance with California's Regulation for In-Use-Offroad Diesel Fueled Fleets.
- ▶ Project proponents of new facilities shall implement waste, disposal, and recycling strategies (i.e., 10 percent recycled content for Tier 1 and 15 percent recycled content for Tier 2) in accordance with the voluntary measures for non-residential land uses contained in Section A5.405.4 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction.
- ▶ Project proponents of new facilities shall achieve or exceed the enhanced Tier 2 target for nonresidential land uses of recycling or reusing 80 percent of the construction waste as described in Section A5.408 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction.

- ▶ Project proponents shall require that all diesel-powered, off-road construction equipment meet EPA's Tier 3 or Tier 4 emissions standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road equipment as it becomes available.
- ▶ Project proponents shall implement a program that incentivizes construction workers to carpool, and/or use public transit or electric vehicles to commute to and from the project site.
- ▶ Where project-level CEQA analysis determine that individual projects under the 2025 Blueprint would exceed thresholds following the implementation of feasible on-site mitigation, projects may participate in local offset programs, or through a California Air Resources Board (CARB)-accredited carbon offset protocol.
- ▶ For projects within PCAPCD's jurisdiction, project applicants should refer to and implement the construction emissions mitigation practices contained within the Placer County Sustainability Plan such as the use of renewable diesel, deployment of battery-electric construction equipment, and electrified jobsite power.

4.7 REVISIONS TO THE LAND USE AND PLANNING SECTION

To provide clarification, the description of the Sacramento San Joaquin Delta Reform Act on page 3.10-4 of the Draft EIR is revised as follows:

Original:

The Delta Plan's 14 regulatory policies were approved by the Office of Administrative Law and became effective with legally enforceable regulations set forth in California Code of Regulations, title 23, sections 5001 et seq. on September 1, 2013.

Revised:

The Delta Plan's 15 regulatory policies are legally enforceable regulations set forth in California Code of Regulations, title 23, sections 5001 et seq.

To provide clarification, the first paragraph under the heading "Transportation Network Improvements and Programs" on page 3.10-12 of the Draft EIR is revised as follows:

Original:

The 2025 Blueprint includes a variety of transportation projects and programs, including regional transit projects, local transit projects, road pricing improvements, and highway and roadway improvements. The plan supports planning efforts for locally sponsored traffic calming and alternative transportation initiatives, such as paths, trails, overcrossings, and bicycle plans that foster improved neighborhoods and community connections. The focus for planned transportation improvements is on road maintenance, safety enhancements, other roadway operational improvements, and targeted capacity improvements to existing facilities that accommodate increased travel between urban areas.

Revised:

The 2025 Blueprint includes a variety of transportation projects and programs, including regional transit projects, local transit projects, road pricing projects, and highway and roadway improvements. The plan supports planning efforts for locally sponsored traffic calming and alternative transportation initiatives, such as paths, trails, overcrossings, and bicycle plans that foster improved neighborhoods and community connections. The focus for planned transportation improvements is on road maintenance, safety enhancements, other roadway operational improvements, and targeted capacity improvements to existing facilities that accommodate increased travel between urban areas.

4.8 REVISIONS TO THE RECREATION SECTION

To provide clarification, the description of DPC's economic sustainability plan on page 3.15-16 of the Draft EIR is revised as follows:

Original:

The 2009 Delta Reform Act (Public Resources Code section 29759) requires the DPC to prepare an economic sustainability plan (ESP) for the Delta region.

Revised:

The Delta Reform Act (Water Code section 85000 et. seq.) requires the DPC to prepare an economic sustainability plan (ESP) for the Delta region.

4.9 REVISIONS TO THE TRIBAL CULTURAL RESOURCES SECTION

To provide clarification, Mitigation Measure 3.17-3 on pages ES-76 through ES-78 and 3.17-13 of the Draft EIR is revised as follows:

Original:

Implement Mitigation Measure 3.17-3: Reduce Visibility or Accessibility of Tribal Cultural Resources

The culturally affiliated Tribe shall consult with the Lead Agency to determine whether or not implementation of a project would indirectly impact tribal cultural resources by increasing public visibility and ease of access. If so, the project sponsor and/or implementing agency shall take measures to reduce the visibility or accessibility of the tribal cultural resource to the public. Visibility of the resource can be reduced through the use of decorative walls or vegetation screening. Accessibility can be reduced by installing fencing or vegetation barriers, particularly noxious vegetation such as poison oak or blackberry bushes. It is important to avoid creating an attractive nuisance when protecting significant sites. Conspicuous walls or signs indicating that an area is restricted may result in more attempts to access the excluded area.

Revised:

Mitigation Measure 3.17-3: Identify and Protect Tribal Cultural Resources

The culturally affiliated Tribe shall consult with the Lead Agency to determine whether or not implementation of a project would impact tribal cultural resources. During this consultation, the Lead Agency will engage the Tribe regarding the need for a Tribal survey to identify potential tribal cultural resources that meet the definition under PRC Section 21074.

Also during this consultation, the Lead Agency and Tribe shall determine whether or not implementation of a project would indirectly impact tribal cultural resources by increasing public visibility and ease of access. If so, the project sponsor and/or implementing agency shall take measures to reduce the visibility or accessibility of the tribal cultural resource to the public. Visibility of the resource can be reduced through the use of decorative walls or vegetation screening. Accessibility can be reduced by installing fencing or vegetation barriers, particularly noxious vegetation such as poison oak or blackberry bushes. It is important to avoid creating an attractive nuisance when protecting significant sites. Conspicuous walls or signs indicating that an area is restricted may result in more attempts to access the excluded area. All measures shall be developed in coordination with the Tribe to ensure appropriate Tribal access.

4.10 REVISIONS TO THE TRANSPORTATION SECTION

To provide clarification, additional text has been added to the last sentence in the first bulleted paragraph under the Freeways and Highways heading on page 3.16-7, as follows:

Original:

There are no existing HOT Lanes in the region but they are proposed for future implementation.

Revised:

There are no existing HOT Lanes in the region but they are proposed for future implementation as part of the plan.

To provide clarification, additional text has been added to the list of major freeways and highways within the plan area on pages 3.16-7 and 3.16-8 of the Draft EIR to note existing HOV lanes and planned HOV/HOT lanes during the plan implementation period, as well as add State Route 51 (Business Loop 80) to recognize its role as a major highway in the plan area:

Original:

- ▶ Interstate 5 (I-5) is a 4 to 10-lane freeway that runs from north to south through the western portion of the plan area and is the largest of the major regional facilities in the area. I-5 is a major federal interstate freeway and travels from the Canadian border to Mexico.
- ▶ Interstate 80 (I-80) is a 6 to 14-lane freeway that runs from west to east from the San Francisco Bay Area to the California/Nevada state line, passing through Yolo, Sacramento, and Placer counties in the plan area. I-80 is also part of the federal interstate system, connecting the East Coast of the United States with the Pacific Rim.
- ▶ Interstate 505 (I-505) is a 4-lane freeway extending 22 miles from I-5 near Dunnigan south to Yolo County near Winters. Outside of Yolo County and the SACOG region, I-505 merges with I-80 in Vacaville. I-505 connects areas north of Sacramento to areas east of Sacramento while bypassing traffic in the urbanized region of Sacramento and its suburbs.
- ▶ US Highway 50 (US 50) is a 4 to 10-lane east-west route that is part of the California State Highway system, which predates the federal interstate system. US 50 traverses the plan area from the eastern portion of Yolo County through Sacramento and El Dorado counties.
- ▶ State Route (SR) 20 is a state highway that runs east and west north of Sacramento from the North Coast to the Sierra Nevada. In the SACOG region, this 2 to 4-lane facility runs through Yuba and Sutter counties and through the cities of Marysville and Yuba City where it serves as a local street.
- ▶ SR 49 is part of the state highway system while also serving as Main Street in several foothill communities. In the SACOG region, SR 49 is a 2 to 6-lane, north-south highway that traverses the central portion of the plan area through El Dorado, Placer, and Yuba counties.
- ▶ SR 65 is a 2 to 5-lane, north-south highway that traverses the east side of the plan area through Sacramento, Placer, and Sutter counties. The route connects automobile and truck traffic originating in the I-80 corridor (in the Roseville/Rocklin area) to the SR 70/99 corridor (in the Marysville/Yuba City area).
- ▶ SR 70 is a 2 to 4-lane, north-south highway on the western side of the plan area through Sutter and Yuba counties. SR 70 is a local street through downtown Marysville.
- ▶ SR 99 is the second largest regional facility in the plan area. SR 99 is a 2 to 8-lane north-south highway and freeway that traverses the central portion of the plan area through Sacramento and Sutter counties. SR 99 serves ten of the state's urbanized areas, making it an important corridor in the Central Valley. The route also serves as a main access between several small cities and urban areas in Sacramento County.

Revised:

- ▶ Interstate 5 (I-5) is a 4 to 10-lane freeway that runs from north to south through the western portion of the plan area and is the largest of the major regional facilities in the area. I-5 is a major federal interstate freeway and travels from the Canadian border to Mexico. I-5 has HOV lanes in both directions in Sacramento County from south of Elk Grove Boulevard to the US 50 interchange. HOV/HOT lanes are planned from Consumnes River Boulevard to the Sacramento County border west of Airport Boulevard. HOV lanes are planned to extend south to Hood Franklin Road.
- ▶ Interstate 80 (I-80) is a 6 to 14-lane freeway that runs from west to east from the San Francisco Bay Area to the California/Nevada state line, passing through Yolo, Sacramento, and Placer counties in the plan area. I-80 is also part of the federal interstate system, connecting the East Coast of the United States with the Pacific Rim. I-80 has HOV lanes in both directions in Sacramento and Placer counties between SR 65 and West El Camino Avenue. HOV/HOT lanes are planned from the SR 113 interchange to the SR 65 interchange.
- ▶ Interstate 505 (I-505) is a 4-lane freeway extending 22 miles from I-5 near Dunnigan south to Yolo County near Winters. Outside of Yolo County and the SACOG region, I-505 merges with I-80 in Vacaville. I-505 connects areas north of Sacramento to areas east of Sacramento while bypassing traffic in the urbanized region of Sacramento and its suburbs.
- ▶ US Highway 50 (US 50) is a 4 to 10-lane east-west route that is part of the California State Highway system, which predates the federal interstate system. US 50 traverses the plan area from the eastern portion of Yolo County through Sacramento and El Dorado counties. US 50 has HOV lanes in both directions in Sacramento and El Dorado County between Watt Avenue and Cameron Park Drive. HOV/HOT lanes are planned from the I-80 interchange to the Folsom Road interchange. HOV lanes are planned to be extended to west of Cameron Park Drive.
- ▶ State Route (SR) 20 is a state highway that runs east and west north of Sacramento from the North Coast to the Sierra Nevada. In the SACOG region, this 2 to 4-lane facility runs through Yuba and Sutter counties and through the cities of Marysville and Yuba City where it serves as a local street.
- ▶ SR 49 is part of the state highway system while also serving as Main Street in several foothill communities. In the SACOG region, SR 49 is a 2 to 6-lane, north-south highway that traverses the central portion of the plan area through El Dorado, Placer, and Yuba counties.
- ▶ State Route 51 (Business Loop 80) is a 6 to 8-lane, north-south highway that traverses the central plan area of the proposed MTP/SCS in Sacramento county. The route connects automobile and truck traffic originating in the SR 99 and US 50 corridors (in the City of Sacramento) to the I-80 corridor (in northern Sacramento County). SR 51 has HOV lanes in Sacramento County in both directions between the SR 99/US 50 system interchange and N Street (NB) or B Street (SB). HOV/HOT lanes are planned from the SR 99/US 50 system interchange to SR 160.
- ▶ SR 65 is a 2 to 5-lane, north-south highway that traverses the east side of the plan area through Placer and Yuba counties. The route connects automobile and truck traffic originating in the I-80 corridor (in the Roseville/Rocklin area) to the SR 70/99 corridor (in the Marysville/Yuba City area). HOV/HOT lanes are planned from the I-80 interchange to north of Blue Oaks Boulevard.
- ▶ SR 70 is a 2 to 4-lane, north-south highway on the western side of the plan area through Sutter and Yuba counties. SR 70 is a local street through downtown Marysville.
- ▶ SR 99 is the second largest regional facility in the plan area. SR 99 is a 2 to 8-lane north-south highway and freeway that traverses the central portion of the plan area through Sacramento and Sutter counties. SR 99 serves ten of the state's urbanized areas, making it an important corridor in the Central Valley. The route also serves as a main access between several small cities and urban areas in Sacramento County. SR 99 has HOV lanes in both directions in Sacramento County between the US 50/SR 51 system interchange and Elk Grove Boulevard. HOV/HOT lanes are planned from the SR 160 interchange to Grant Line Road.

To provide clarification, the superscript text in Table 3.16-9 on pages 3.16-38 and 3.16-39 has been corrected as follows:

Original:

Table 3.16-9 2025 Blueprint Roadway Route and Lane Mileage in the Plan Area by Class

Roadway Class	2020	2022	2050 MTP/SCS	Change from 2020	% Change from 2020	Change from 2022	% Change from 2022
Route Miles							
General Purpose Freeway	320	320	320	+	+%	+	+%
HOV/HOT Lane ²	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Auxiliary Lanes/Ramps ²	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Expressways/Arterials	1,573	1,548	1,730	+157	+10%	+181	+12%
Collectors/Local Streets ³	10,678	10,741	12,366	+1,688	+16%	+1,625	+15%
All Roadway Classes	12,571	12,610	14,416	+1,845	+15%	+1,806	+14%
Arterial & Above	1,893	1,869	2,050	+157	+8%	+181	+10%
Lane Miles							
General Purpose Freeway	1,684	1,684	1,696	+12	1%	+12	+1%
HOV/HOT Lane ²	130	n/a 4	247	+117	90%	n/a	n/a
Auxiliary Lanes/Ramps ²	238	n/a 4	311	+74	31%	n/a	n/a
Arterials/Expressways	4,145	4,080	4,835	+690	17%	+755	+19%
Collectors/Local Streets ³	22,249	22,371	25,636	+3,387	15%	+3,265	+15%
All Roadway Classes	28,446	28,135	32,725	+4,279	15%	+4,590	+16%
Arterial & Above	6,196	5,763	7,089	+892	14%	+1,325	+23%
Population	2,540,353	2,540,425	3,120,053	+579,700	23%	+579,628	+23%
Lane Miles Per Thousand People	11.20	11.07	10.49	-0.71	-6%	-1	-5%

¹ From "California Public Road Data Reports," and Highway Performance Monitoring Data provided by Caltrans. Data assembled by and modified SACOG to include HOV and auxiliary lane mileage.

² Since HOV/HOT lanes, auxiliary lanes and ramps are located within other freeway routes, they do not generate route mileage, only lane mileage. No existing HOT lanes in 2020 or 2022.

³ Quantity of local streets based on applying a per capita rate to population growth.

⁴ Lane mile by lane type data not available in "California Public Road Data Reports."

Source: Data provided by SACOG 2025.

Revised:**Table 3.16-9 2025 Blueprint Roadway Route and Lane Mileage in the Plan Area by Class**

Roadway Class	2020	2022	2050 MTP/SCS	Change from 2020	% Change from 2020	Change from 2022	% Change from 2022
Route Miles							
General Purpose Freeway	320	320	320	+	+%	+	+%
HOV/HOT Lane ²	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Auxiliary Lanes/Ramps ²	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Expressways/Arterials	1,573	1,548	1,730	+157	+10%	+181	+12%
Collectors/Local Streets ³	10,678	10,741	12,366	+1,688	+16%	+1,625	+15%
All Roadway Classes	12,571	12,610	14,416	+1,845	+15%	+1,806	+14%
Arterial & Above	1,893	1,869	2,050	+157	+8%	+181	+10%
Lane Miles							
General Purpose Freeway	1,684	1,684	1,696	+12	1%	+12	+1%
HOV/HOT Lane ²	130	n/a ⁴	247	+117	90%	n/a	n/a
Auxiliary Lanes/Ramps ²	238	n/a ⁴	311	+74	31%	n/a	n/a
Arterials/Expressways	4,145	4,080	4,835	+690	17%	+755	+19%
Collectors/Local Streets ³	22,249	22,371	25,636	+3,387	15%	+3,265	+15%
All Roadway Classes	28,446	28,135	32,725	+4,279	15%	+4,590	+16%
Arterial & Above	6,196	5,763	7,089	+892	14%	+1,325	+23%
Population	2,540,353	2,540,425	3,120,053	+579,700	23%	+579,628	+23%
Lane Miles Per Thousand People	11.20	11.07	10.49	-0.71	-6%	-1	-5%

¹ From "California Public Road Data Reports," and Highway Performance Monitoring Data provided by Caltrans. Data assembled by and modified SACOG to include HOV and auxiliary lane mileage.

² Since HOV/HOT lanes, auxiliary lanes and ramps are located within other freeway routes, they do not generate route mileage, only lane mileage. No existing HOT lanes in 2020 or 2022.

³ Quantity of local streets based on applying a per capita rate to population growth.

⁴ Lane mile by lane type data not available in "California Public Road Data Reports."

Source: Data provided by SACOG 2025.

To provide clarification, the table reference for roadway route and lane mileages in the second paragraph of page 3.16-11 of the Draft EIR is revised as follows:

Original:

Table 3.16-1 provides a tabulation of roadway classes by route miles and lane miles for the SACOG region.

Revised:

Table 3.16-9 provides a tabulation of roadway classes by route miles and lane miles for the SACOG region.

The date that the City of West Sacramento began operation of its Via Rideshare services has been corrected on page 3.16-15 as follows:

Original:

SacRT's service is called SacRT Flex Ride and was launched in January 2025 to provide service to eight different zones in the Sacramento area. The City of West Sacramento's service, Via Rideshare, was implemented in January 2024. Service hours are from 6:00 a.m. to 11:00 p.m. on weekdays, 9:00 a.m. to 11:00 p.m. on Saturdays, and 8:00 a.m. to 8:00 p.m. on Sundays.

Revised:

SacRT's service is called SacRT Flex Ride and was launched in January 2025 to provide service to eight different zones in the Sacramento area. The City of West Sacramento's service, Via Rideshare, was implemented in May 2018. Service hours are from 6:00 a.m. to 11:00 p.m. on weekdays, 9:00 a.m. to 11:00 p.m. on Saturdays, and 8:00 a.m. to 8:00 p.m. on Sundays.

To provide clarification, the final sentence of the first paragraph under the "Bicycles" heading on page 3.16-16 is revised as follows:

Original:

Figure 3.16-3 shows the cross-section of each type of bicycle facility, as further defined below.

Revised:

Each type of bicycle facility is further defined below.

To provide clarification, the second to last sentence in the second paragraph under the "Goods Movement" heading on page 3.16-23 is revised as follows:

Original:

For goods originating or destined for the region, but with the other end of trip outside the region, 27 percent of the tonnage is carried by trucks, and the remainder by other modes.

Revised:

For goods originating in the region, but with the other end of trip outside the region, 71.9 percent of the tonnage is carried by trucks, and the remainder by other modes.

To provide clarification on daily freight service trends, additional text has been added following the second to last sentence under the "Goods Movement" heading on page 3.16-23, as follows:

Original:

The number of daily freight deliveries per person in the United States has increased from about 0.12 in 2009 to 0.25 in 2018 (TIME 2018). In response to growing demand and faster delivery times, delivery vehicle options have expanded to include passenger cars and experimentation with drones and small robot vehicles operating on sidewalks.

Revised:

The number of daily freight deliveries per person in the United States has increased from about 0.12 in 2009 to 0.25 in 2018 (TIME 2018). Since 2018, the USDOT Bureau of Transportation Statistics January Freight Transportation Services Index has shown an increase of 4.1 percent in daily freight carried by the for-hire transportation industry (BTS 2025). In response to growing demand and faster delivery times, delivery vehicle options have expanded to include passenger cars and experimentation with drones and small robot vehicles operating on sidewalks.

To provide clarification, the reference to "this group" in the second sentence on 3.16-44 has been replaced with "new residents" to clarify the connection with the prior sentence, as follows:

Original:

Overall, this group is projected to travel approximately 29 percent less VMT per capita than the region's population did in 2020.

Revised:

Overall, new residents are projected to travel approximately 29 percent less VMT per capita than the region's population did in 2020.

4.11 REVISIONS TO THE UTILITIES AND SERVICE SYSTEMS SECTION

To provide clarification about the energy services provided the plan area, the environmental setting for electricity and natural gas on page 3.18-24 of the Draft EIR is revised as follows to remove an unclear reference to natural gas services:

Original:

Pacific Gas and Electric Company (PG&E), Sacramento Municipal Utility District (SMUD), Pioneer Community Energy, Valley Clean Energy, and Roseville Electric provide natural gas and electricity services to the plan area.

Revised:

Pacific Gas and Electric Company (PG&E), Sacramento Municipal Utility District (SMUD), Pioneer Community Energy, Valley Clean Energy, and Roseville Electric provide electricity services to the plan area.

For clarification, the text on page 3.18-24 of the Draft EIR is revised to include a period at the conclusion of the last sentence under the "Energy Service Providers" subheading, as follows:

Original:

Roseville Electric generates power from the Roseville Energy Park, a 160-MW natural gas fire plant that generates enough energy to meet 40 percent of the city's needs. The remainder of Roseville's electricity is purchased

Revised:

Roseville Electric generates power from the Roseville Energy Park, a 160-MW natural gas fire plant that generates enough energy to meet 40 percent of the city's needs. The remainder of Roseville's electricity is purchased.

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5 REFERENCES

- BTS. See US Department of Transportation, Bureau of Transportation Statistics.
- California Geological Survey 2025. *Earthquake Shaking Potential for California*. Available: <https://www.conservation.ca.gov/cgs/sh/earthquake-shaking-potential>.
- SMAQMD et al. See Sacramento Metropolitan Air Quality Management District, El Dorado County Air Quality Management District, Feather River Air Quality Management District, Placer County Air Pollution Control District, Yolo-Solano Air Quality Management District, and Sacramento Area Council of Governments.
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- US Fish and Wildlife Service. 2005. *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog*. Available: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83914&inline>. Accessed August 19, 2025.
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- USFWS. See US Fish and Wildlife Service.
- USFWS and CDFG. See US Fish and Wildlife Service and California Department of Fish and Game.

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