Appendix F

Response to Comments
This Response to Comments (RTC) document provides a response to public and agency comments received by the Association of Monterey Bay Area Governments (AMBAG) on the Draft Environmental Impact Report (EIR) for the 2040 Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS). AMBAG received 13 comment letters on the Draft EIR and additional comments were provided verbally at a public hearing on the Draft EIR on January 30, 2018. Verbal comments specific to the Draft EIR were not provided during the other four public hearings on the Draft EIR, which occurred on January 10, January 11, January 22 and January 24, 2018.

1.1 Organization of Comment Letters and Responses

This section presents a list of comment letters and other comments received during the public review period and describes the organization of the letters and comments that are provided in Section 1.2, Comments and Responses, of this document. The 13 letters are presented in the following order: state public agencies (2), regional and local public agencies (4), private groups and organizations (1) and individuals (6). Each comment letter has been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter and then the number assigned to each issue. For example, Response 1.2 indicates that the response is for the second issue raised in comment Letter 1.

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<td>7. Rick Longinotti, Co-Chair</td>
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Association of Monterey Bay Area Governments
2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

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<td>16. Becky Steinbruner</td>
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Comments on the Draft EIR were provided verbally by three people at the public hearing held on January 30, 2018. Verbal comments on the Draft EIR were not provided during the other four public hearings on the Draft EIR, which occurred on January 10, January 11, January 22 and January 24, 2018. Transcriptions of these verbal comments and responses are provided in Section 1.2, Comment and Responses, following the comment letters and response to comment letters. Similar to comment letters, each verbal comment has been numbered sequentially, continuing numbering used for comment letters, in alphabetical order based on the last name of the speaker. Each separate issue raised by the commenter has been assigned a number. Verbal comments are shown as comments 14 through 16 in the table above.

1.2 Comments and Responses

Written responses to each comment letter and public hearing comment received on the Draft EIR are provided in this section. All letters received during the public review period on the Draft EIR are provided in their entirety. Similarly, transcriptions of the verbal comments provided at the public hearing are also provided.

Please note that text within individual letters that has not been numbered does not specifically raise significant environmental issues and/or does not relate directly to the adequacy of the information or analysis within the Draft EIR and therefore no response is required, per State CEQA Guidelines Section 15088.

Where revisions or changes to the Draft EIR text are called for in response to a comment, the page and paragraph are set forth, followed by the appropriate revision. Added text has been indicated with underlined text. Text deleted from the Draft EIR has been shown in strikethrough. Page numbers correspond to the page numbers of the Draft EIR. When mitigation measure language has been changed, it has been changed in both the text on the stated Draft EIR page, as well as the summary table (Table 2) in the Executive Summary of the Draft EIR.
February 5, 2018

Association of Monterey Bay Area Governments (AMBAG), c/o
State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

Comments: draft 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans, and Draft EIR (SCH#2015121080)

Dear AMBAG Directors and staff:

California Coastal Commission staff appreciates the opportunity to comment on the draft 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans (2040 MTP/SCS), and the companion DEIR. We applaud the level of planning and support for non-automotive transportation alternatives that the 2040 MTP/SCS represents. The overall goals of protecting and improving the Monterey Bay region’s transportation system in an environmentally sensitive fashion are consistent with numerous California Coastal Act policies, including Coastal Act Policy Section 30252 regarding non-automotive transportation alternatives.

We strongly support the overall approach of developing an area-wide, long-range transportation plan for the entire Monterey Bay region. The 2040 MTP/SCS aims to maintain and enhance the mature transportation systems that already exist in the region. As such, this system establishes the framework for future development throughout the region—including the Coastal Zone (CZ). Please note that while the CZ typically is only a few thousand feet (or less) wide in already-urbanized areas, it extends up to 5 miles inland within the more rural areas of the 2040 MTP’s geographical scope (i.e., along the Big Sur Coast, in the Elkhorn Slough watersheds, and in northern Santa Cruz County).

And, because it will affect the content of the Regional Transportation Plan (RTP) for each county, and the budget allocations for future transportation projects, adoption of an effective MTP/SCS is of particular strategic importance. Noting that future development will impact the entire region’s watersheds, and the ability of the public to access the coast from inland locations, our comments are directed at the entirety of the 2040 MTP planning area (not the Coastal Zone alone).

General comments: Coastal Act requirements. Pursuant to the California Coastal Act, all development in California’s Coastal Zone is subject to a Coastal Development Permit (CDP). The region’s two coastal counties, and most of its coastal cities (all but Pacific Grove and Monterey) have Coastal Commission-
certified Local Coastal Programs (LCPs) and issue the necessary CDP’s within their jurisdictions. The certified LCP and the public access policies of the Coastal Act (seaward of the first public road) serve as the standard of review for all new CZ development projects, including transportation projects.

In certain instances, the Coastal Commission itself will need to act on a proposed project. Examples of such projects include those located where there is no certified LCP; those within the Commission’s retained CDP jurisdiction (such as State lands, existing and filled wetlands, etc.); local CDPs that have been appealed; or, where local governments have requested Coastal Commission review of projects that overlap jurisdictional boundaries. The Commission also directly reviews certain federal projects, pursuant to its responsibilities under the federal Coastal Zone Management Act of 1972.

In most cases, the cornerstone of each local government’s LCP is its general plan and zoning, prepared in accordance with this State’s General Plan Law (and subsequent acts, including the Coastal Act and SB 375 concerning greenhouse gases (GHGs)). The 2040 MTP/SCS anticipates future transportation needs, based on existing and projected future development in accordance with local government General Plans within and outside the region’s Coastal Zone. This in turn establishes which projects will receive transportation funding, as administered through each county’s Regional Transportation Plan and implementing Regional Transportation Improvement Plan (RTIP).

For each transportation improvement project, the overall structure of the 2040 MTP/SCS DEIR appears to call for 1) identification of applicable impacts, per CEQA; and, 2) application of appropriate mitigation measures, as listed in the draft 2040 MTP/SCS DEIR document (in a very general way). Overall, we believe rigorous implementation of this approach can (potentially) provide for conformance with corresponding Coastal Act policies such as those pertaining to environmentally sensitive habitats; scenic resources; air quality (now including GHGs, per Air Resources Board); minimizing energy use; protection of agricultural lands and water quality; and, mitigation of archaeological and paleontological impacts.

Developing projects that will succeed in receiving necessary CDPs relies on consultation with local government and Coastal Commission staff—especially with respect to issues not explicitly addressed by CEQA. Examples of such issues include: recreational and scenic qualities, public access opportunities, coastal trail continuity, planned retreat or other adaptation to anticipated climate change impacts, and protection of coastal agricultural lands if not otherwise addressed by the CEQA process.

Recommendation: the 2040 MTP/SCS should explicitly encourage every agency proposing transportation project(s) within or impacting the Coastal Zone, to proactively contact and coordinate with Coastal Commission and local government LCP staff—as early as possible in the project cycle. The purposes of such early coordination are to:
• Identify applicable LCP and Coastal Act policies, opportunities and constraints, before the project design is finalized;

• Develop reasonable alternatives for meeting the identified transportation need, for consideration during the environmental review process;

• Avoid unnecessary delays in the permitting process, especially through collaboration with local governments, and by insuring that necessary environmental studies concurrently address both Coastal Act and CEQA requirements, simultaneously; and,

• Identify appropriate, feasible mitigation measures, if there are unavoidable impacts.

**General comment: coastal watershed and wildfire vulnerability context.** Protection of coastal water quality is an important Coastal Act issue. All of the region’s watersheds—including San Benito County’s Pajaro River watershed—provide freshwater inflows to Monterey Bay National Marine Sanctuary, habitat for critical wildlife (e.g., migratory steelhead), and sand replenishment to our coastlines. Further, protection of these watersheds is critical for both agriculture and domestic water supply, either directly through impoundment/diversion or indirectly through recharge of the aquifer. During drought, water supply is especially important for community resiliency. We believe that the future availability of water resources will likely be the main determinant of the location and limits of further development. Today’s local zoning and projected maximum total buildout will likely have to be adjusted accordingly. This in turn will affect projected needs for transportation infrastructure.

Therefore, we now need to question those land use policies that facilitate residential subdivision and development in areas that lack adequate future water supplies, and in areas especially vulnerable to wildland fires, flooding and other hazards. In short, such residential development is generally an incompatible use in such resource-constrained and high-hazard environments—and, where it must be allowed, densities should be minimized, mitigation measures made mandatory, and transportation system demand projections adjusted accordingly.

In sum, the Coastal Act (and good land use planning) dictates not that new development be halted, but instead shifted to those places best able to accommodate it (per Coastal Act Section 30250). This means that to promote sustainable communities within the MTP/SCS planning area, new density should be directed away from areas prone to wildland fire, floodplains, low-lying areas vulnerable to sea level rise (SLR), bluff edges exposed to shoreline retreat, wetlands, coastal dunes and other environmentally sensitive habitat areas (Coastal Act Sections 30231, 30233, 30240, 30253). The most productive agricultural lands and aquifer recharge areas should be protected as well (Coastal Act Sections 30231, 30241-30242). If these constraints are combined with water supply limitations, it is likely that future
development patterns will differ significantly—and transportation demand and facilities will need to shift accordingly (Coastal Act Sections 30250, 30254).

**Recommendation:** the 2040 MTP/SCS should emphasize the need for regularly updating the regional transportation demand analyses, to map and rigorously take into account the above-cited constraints (sensitive habitats, hazards, SLR, water supply, agriculture). Because it is the agency with the broadest overall regional perspective, this role may be most appropriate for AMBAG. Each regional transportation agency, and affected local jurisdictions will then be in a position to update their respective land use and transportation plans accordingly.

**General comments: coastal public access context.** The California Coastal Act mandates that maximum opportunities for public access to the coast shall be provided, subject to several common sense considerations (Calif. Public Resources Code Sec. 30210-30214 et seq.) In Sec. 30254, the Legislature further instructs that the rural sections of State Highway Route 1 remain in a scenic, two-lane configuration.

One of the best-known public access features of the region is the partially complete Monterey Bay Sanctuary Scenic Trail (MBSST), part of the California Coastal Trail (CCT) network. The MBSST is envisioned to eventually provide for both a bikeway and a pedestrian route, between Pacific Grove and Davenport. The 2040 MTP/SCS, we believe, represents a highly appropriate opportunity to prioritize completion of the MBSST, as well as connecting CCT segments. To the extent that it will encourage walking and bicycles as preferred commute modes, this will help communities meet their GHG goals consistent with SB 375 (and Coastal Act Sec. 30253 regarding air quality, minimizing energy consumption, and vehicle miles traveled). As a matter of public policy, completion of the MBSST/CCT will be an asset for both public recreation and public health, for our region’s tourism economy and for supporting sustainable communities.

Now, how does the public actually reach the coast? The majority of visitors from outside the Coastal Zone (CZ) get to the beach or coastal trail trailheads by automobile. Within the geographical scope of the 2040 MTP/SCS, the majority of coastwise State Highway Route 1 (SR1) either forms the Coastal Zone boundary, or falls entirely within the CZ. As such, it comprises the prime mode for the public to move along the coast, and to access coastal trail trailheads. SR1 is especially indispensible for access to beaches, aquaria, scenic vantage points, and supporting visitor services of every kind. Accordingly, it is existential for our tourism-oriented economies.

But, of at least equal importance, is the ability of the public to get to their coast. Understood in this way, the functions of U.S. Hwy. 101, SR68, SR183, SR129, SR152, SR156 and SR17, as well as local
arterials such as San Miguel Canyon Road and San Andreas Road, take on a much larger importance. Each of these roadways lie within the scope of the 2040 MTP/SCS.

In addition, the region’s rail corridors—including Amtrak’s Coast Line, as well as the dormant Monterey Branch Line (MBL) and limited use Santa Cruz Branch Line (SCBL)—are considered valuable supplements to the roadway system. This applies to rail’s capacity to move freight as well as people. It has been posited that every rail car can move the same tonnage as four highway big rigs (CSX website; SCCRTC hearing of 1/18/2018). Therefore, to the extent that a functioning rail freight system exists, it proportionately can protect the capacity of the roadway system for all users. Thus, rail lines can represent an economical, GHG-efficient mode for certain types of freight movement—and, for getting the public to the coast (and home again).

Recommendation: the 2040 MTP/SCS should clearly indicate that:

- the MBSST/CCT are (non-motorized) components of the regional transportation system and should be given funding priority as such;
- the role of SR1 as the region’s premier coastwise public access route be explicitly recognized;
- the designation of the Big Sur Coast segment of SR1 as both a State Scenic Highway and a National Scenic Byway be emphasized, and that it be maintained in accordance with the recommendations ratified by all agencies that participated in the development of the Coast Highway Management Plan (CHMP)(c.2002). CHMP signatories included, among others, the lead agency Caltrans, the Federal Highway Administration, the California Coastal Commission, TAMC, and Monterey County;
- the rural sections of SR1 must remain in a scenic 2-lane configuration, pursuant to Coastal Act Section 30254; and,
- public access from inland areas to the coast is facilitated by the region’s many State Highway routes, local arterials, transit services (including Amtrak Thruway buses), and rail—potentially including the MBL and SCBL; therefore, each transportation improvement project providing access to the coast should be evaluated accordingly, and priority given to those projects that best provide for public access, both locally and regionally.

Timeline and climate change context. One limiting factor for the MTP/SCS is its chronological horizon of 2040. The obvious “elephant in the room” is that projected sea level rise (SLR) and other anticipated climate change impacts (e.g., more frequent large floods, shoreline retreat, drought, etc.) will take their most severe toll well beyond the planning horizon of 2040. Yet, the transportation system pattern that we
approve and fund prior to 2040 will, as history demonstrates, establish a template for development far into the future.

Some of the more credible scientific projections predict up to 1 to 2 meters (approx. 3-6 ft.) of SLR for the California central coast region by 2100—thus, only a 1-2 ft. rise by the MTP end point of 2040. Not much of a concern for the 2040 MTP, if all climate change impacts suddenly halt at that point in time. But, the same credible projections show that climate change will most likely be in full acceleration mode by that time, particularly as it may be exacerbated by methane and other GHG releases from melting ocean floor and permafrost areas. Eventual full melting of the West Antarctic and Greenland icecaps, plus thermal expansion of the ocean, could over some centuries yield something on the order of ten times the SLR predicted for 2100.

We realize scenarios for conditions in 2100 are outside of the planning horizon of this draft 2040 plan. However, the extremely long-term planning requirements for transportation and other infrastructure calls on public agencies to begin taking future conditions into account. Thus, we believe the MTP/SCS should recognize and incorporate policies essential for longer-range climate change adaptation, especially SLR adaptation. This could prove very beneficial for the region as many funding sources at the State and Federal level are calling for the incorporation of climate resilient infrastructure designs.

_In addition, specific additions to the draft 2040 MTP/SCS are accordingly suggested below:_

**Recommendation:** the 2040 MTP/SCS would benefit, we believe, by including a specific list of potential transportation system vulnerabilities, and examples of Central Coast transportation facilities that will need to adapt in order to remain resilient to expected climate change phenomena. Expected planning-level geotechnical problems include but are not confined to increased stream and tidal flooding; large and small landslide instabilities; accelerated mass wasting (especially persistent rockfall); and shoreline erosion/retreat, due to SLR and increased storm intensity. These are already partially touched upon by the MTP, but amplification would be helpful for identifying future vulnerabilities, locations needing site-specific planning, and future funding for corrective projects. Including a preliminary list of “hot spots” within the transportation system based on the many climate change/SLR vulnerability assessments occurring throughout the region would benefit the initiation of the long term planning horizon needs for infrastructure projects.

**Rail lines:** suggested additional treatment in the 2040 MTP/SCS text. Improvement and better use of the region’s rail corridors could be amplified in the MTP/SCS. In particular, consideration should be given to the role that at least some of the region’s rail corridors might play in meeting Coastal Act policies promoting mass transit and the minimization of energy use, along with SB 375 requirements regarding minimization of GHG impacts. We also foresee a need for thoughtful advance planning for rail facilities’
adaptation to sea level rise impacts, beyond 2040. Accordingly, consistent with our earlier comments on the California State Rail Plan (CSRP), we recommend that the following rail-related topics receive specific treatment and priority in the MTP/SCS:

- **High Speed Rail (HSR) & Coast Daylight.** The proposed HSR alignment only barely grazes the northeasterly corner of AMBAG’s MTP/SCS planning area. Nonetheless, both the HSR and the revived Coast Daylight service (as described in the CSRP) will provide important non-automotive transportation alternatives for travel between San Francisco and Los Angeles. We believe the MTP/SCS would benefit from noting the advantages of these two new services in terms of protecting the capacity of coastal Highways 1 and 101, for both economic mobility and recreational travel. Sufficient highway capacity infers less need for future highway widening and the associated (potential) environmental impacts on critical wetland habitats and beach areas along the coast.

- **Coast Daylight service.** For the revived Coast Daylight service, the MTP/SCS should note that by providing non-automotive transportation alternatives northbound from the Monterey Peninsula (connecting at the new Castroville station), and southbound from Santa Cruz County (connecting at the proposed new Watsonville/Pajaro station), these service improvements will support preservation of the SR 1 Moss Landing segment as a scenic rural byway consistent with Legislative direction in Coastal Act Section 30254. However, over the long run, SLR is likely to inundate the existing, low-lying UPRR alignment through the midline of Elkhorn Slough. Major adaptive measures will be needed and the opportunities and challenges for these measures should begin to be identified now.

- **Capital Corridor extension.** Likewise, for TAMP’s proposed Capital Corridor extension from San Jose to Salinas, the MTP/SCS should note that by providing non-automotive transportation alternatives northbound from the Monterey Peninsula (connecting at the new Castroville station), it will support preservation of the SR 1 Moss Landing segment as a scenic rural byway consistent with Legislative direction in Coastal Act Section 30254—as well as potentially relieving some congestion on SR156 through the Elkhorn Slough System watershed, northeasterly from Castroville. Within Elkhorn Slough, over the long run, the UPRR tracks or alignment will need to be adapted to expected SLR, as for the extended Coast Daylight service discussed above.

- **Santa Cruz Branch Line (SCBL).** This 32-mile line was recently acquired by the Santa Cruz County Regional Transportation Commission (SCCRTC). The MTP/SCS should expand its discussion of this corridor for maximizing its ability to enhance public access in light of the
above-referenced Coastal Act objectives, including as appropriate for coastal lateral access (as a strand of the MBSST), commuting, and freight transportation.

- **Santa Cruz, Big Trees & Pacific Railway.** The MTP/SCS appropriately includes a discussion of the existing freight and passenger excursion train operation that extends from Felton (Roaring Camp) through the scenic San Lorenzo River gorge, connecting to the SCBL at the Santa Cruz Beach Boardwalk. Although shown on the draft CSRP map of short line freight operations (draft CSRP Exhibit 6.2), there is no accompanying discussion. We note that the MTP corrects this oversight, at least for regional planning purposes.

- **Monterey Branch Line (MBL).** On p.2-11 of the draft 2040 MTP/SCS, under “Commuter and Light Rail,” the status and potential future role(s) of the SCBL are already addressed. However, there is no comparable discussion for TAMC’s MBL. And, both the SCBL and MBL are omitted from Figures 2-2 and 4-4: 2040 Regional Transit Network (although shown on Figure 2-4 Goods Movement System). One specific concern that may warrant identification in the MTP is the classic 5-span steel truss bridge across the Salinas River estuary. It appears to be abandoned, unpainted, rusting in place. But, it represents valuable existing, difficult-to-replace infrastructure. If not maintained, it may have to be replaced when restored rail, fixed guideway and/or MBSST bikeway connections eventually become available. We recommend discussion in the MTP document, and direction to assure that future planning options are not prejudiced through failure to preserve potentially reusable facilities.

**Suggested enhancements to the 2040 MTP/SCS DEIR text (mitigation section).** Mindful of the above Coastal Act and climate change considerations, and in support of this system-level planning effort, we offer the following suggestions for the DEIR document’s mitigation section:

- p.22, GEO-3(b) Hillside Stability Evaluation. Add: *In addition, along the Big Sur Coast and at Waddell Bluffs, mega-landslides and/or ongoing perennial rockfall causes massive instabilities and periodic closures of State Highway Route 1 (SR1). To sustain a functional coastwise transportation system over the long run, the strategies identified in the Big Sur Coast Highway Management Plan (CHMP) should be observed wherever appropriate. Applicable CHMP measures, and examples of each, include (but are not limited to): adaptation to the fluid landform (e.g., Mud Cr. Slide); separation of the highway from the moving landform (e.g., the Rainrocks rockshed, Pitkins Curve bridge, Pfeiffer Gulch bridge, Devil's Slide tunnel); and, temporary or permanent rockfall catchments (e.g., Cow Cliffs rock net, Waddell Bluff berm).*
• p.24, GHG-5 Sea Level Rise Adaptation. Add, after first sentence regarding location of transportation facility structures relative to sea level rise inundation: “...at least during project life.” Also, add: Each transportation project located along or near the coast shall be planned to avoid hazards during its design life or to have adaptive management options to contend with expected climate change impacts over the design life period. Planned retreat may be the most practical solution for low capital investment projects that are located where there is room for feasible realignment in response to sea level rise or shoreline erosion (e.g., a coastal trail segment that can be pulled back from an eroding bluff edge). In such cases, the identified retreat alignment should be protected through dedication of conditional easement or other measures that will assure its availability when and if needed. In contrast, it may not be feasible to progressively retreat or raise certain rigid, high capital investment structures such as highway bridges. Accordingly, such transportation facilities should be adaptively designed—in such a way as to address expected sea level rise during at least the design life of the structure.

• p.26, HAZ-6 Wildland Fire Risk Reduction. In addition to the MTP/SCS’s directing new development away from important agricultural lands, floodplains and other high risk hazard areas, we suggest add: Avoid introducing new or expanded development such as residential subdivisions, schools and hospitals into fire-prone, fire-controlled ecologies (e.g., indigenous Monterey pine forest, Santa Cruz sand hills/Knobcone pine forest, coastal maritime chaparral). Adjust transportation demand projections to account for shifted future development locations, accordingly.

Conclusion. We hope you find the foregoing comments helpful, and invite further discussion of the issues raised. It is evident from the draft 2040 MTP/SCS that we share many mutual goals, and we are eager to resolve any points where differences may arise. Future opportunities to coordinate our coastal planning efforts with AMBAG’s regional planning outlook are welcomed. Please do not hesitate to contact our office if you have any questions.

Sincerely yours,

Susan Craig, Central Coast District Manager
California Coastal Commission

Cc:
California Dept. of Transportation (Caltrans), Dist.5
Monterey County Planning Dept.
Santa Cruz County Planning Dept.
Transportation Agency for Monterey County (TAMC)
Cc (con’t):
Santa Cruz County Regional Transportation Commission (SCCRTC)
City of Carmel
City of Monterey
City of Pacific Grove
City of Seaside
City of Sand City
City of Marina
City of Watsonville
City of Capitola
City of Santa Cruz
Appendix F: Response to Comments

Letter 1

COMMENTER: Susan Craig, Central Coast District Manager, California Coastal Commission

DATE: February 5, 2018

Response 1.1

The commenter states approval and support for the development of the 2040 MTP/SCS in general. This comment is noted and does not require further response or revisions to the Draft EIR.

Response 1.2

The commenter summarizes the regulatory requirements of the Coastal Development Permit and the Local Coastal Programs in the region. The commenter states that for projects requiring a Coastal Development Permit, success will rely on early consultation with local government and Coastal Commission staff. The commenter states that the 2040 MTP/SCS should explicitly encourage every agency proposing transportation project(s) within or impacting the Coastal Zone to proactively contact and coordinate with Coastal Commission and local government staff. This comment pertains to the 2040 MTP/SCS and not the Draft EIR. This comment is noted and does not require further response or revisions to the Draft EIR. Responses to comments pertaining to the 2040 MTP/SCS are provided in Appendix K of the 2040 MTP/SCS.

Response 1.3

The commenter summarizes the importance of protecting water quality and planning development in areas with adequate water supplies and away from hazards, such as wildfires and flooding. The commenter states that the 2040 MTP/SCS should emphasize the need for regularly updating the regional transportation demand analyses, to map and rigorously take into account development constraints. This comment pertains to the 2040 MTP/SCS and not the Draft EIR. This comment is noted and does not require further response or revisions to the Draft EIR. Responses to comments pertaining to the 2040 MTP/SCS are provided in Appendix K of the 2040 MTP/SCS. Briefly, as stated therein, AMBAG recently received a grant from Caltrans as part of the SB 1 Adaptation Planning Grant Program for the Central Coast Highway 1 area from Castroville to the Santa Cruz County line. The project will identify climate change impacts and related risks to multimodal transportation infrastructure in the project area. The study will then identify a suite of transportation and adaptation scenarios to remedy the identified climate-related vulnerabilities and evaluate the proposed adaptation approaches, including the economic impact of each of the identified adaptation approaches. The study is expected to be completed in Spring 2020 and study results will be incorporated into the next update of the MTP/SCS.

Although this comment pertains to the 2040 MTP/SCS, it should be noted, however, that the Draft EIR analyzes potential impacts related to the issues raised in the comment. Impact W-2 on pages 336-338 of the Draft EIR addresses water supply impacts. Impact B-2 on page 197 of the Draft EIR provides an analysis of potential impacts on wetlands. Impact GHG-5 on pages 286 and 287 of the Draft EIR provides an analysis of impacts related to sea level rise and associated coastal flooding. Impact GEO-2 on pages 260 and 261 of the Draft EIR provides an analysis of potential impacts related to soil erosion. Section 4.10, Hydrology and Water Quality, which begins on page 315 of the Draft EIR, also addresses impacts related to soil erosion, as well as potential flooding hazards. Impacts related to wildland fire hazards are analyzed in Impact HAZ-9 on pages 309 through 311 of the Draft EIR.
the Draft EIR. It should additionally be noted that the MTP/SCS is updated every four years and the underlying latest planning assumptions in the SCS include local General Plans, which are required to address the issues raised in this comment.

Response 1.4

The commenter states the importance of the road network for public access to the coast, as well as trails in the region. The commenter states that railways in the region may protect the capacity of the roadways for all users. The commenter states that scenic qualities of Highway 1 should be preserved. The commenter requests that the 2040 MTP/SCS clearly indicate these points. This comment pertains to the 2040 MTP/SCS and not the Draft EIR. This comment is noted and does not require further response or revisions to the Draft EIR. Responses to comments pertaining to the 2040 MTP/SCS are provided in Appendix K of the 2040 MTP/SCS. Briefly, as stated therein, the 2040 MTP/SCS recognizes the scenic nature of the Big Sur Coast segment of Highway 1 and maintains rural sections of Highway 1 in a scenic two-lane configuration. A discussion of the region’s passenger and freight rail is included in Chapter 2 of the 2040 MTP/SCS. Additionally, potential impacts related to designated State scenic highways are analyzed in Impact AES-1 on pages 95 through 97 of the Draft EIR.

Response 1.5

The commenter states that global climate change and sea level rise may impact the projects in the 2040 MTP/SCS, especially beyond the 2040 planning horizon. The commenter recommends that the MTP/SCS recognize and incorporate policies essential for longer-range climate change adaptation, especially sea level rise adaptation. The commenter further recommends that the 2040 MTP/SCS include a specific list of transportation system facilities that would be potentially vulnerable to sea level rise and would need to adapt in order to remain resilient. This comment pertains to the 2040 MTP/SCS and not the Draft EIR. This comment is noted and does not require further response or revisions to the Draft EIR. However, note that pages 268-270 of the Draft EIR summarize the projected future impacts of climate change and Impact GHG-5 on pages 286 and 287 of the Draft EIR provides an analysis of impacts and recommends mitigation measures related to sea level rise and associated coastal flooding.

Responses to comments pertaining to the 2040 MTP/SCS are provided in Appendix K of the 2040 MTP/SCS. Briefly, as stated therein, AMBAG recently received a grant from Caltrans as part of the SB 1 Adaptation Planning Grant Program for the Central Coast Highway 1 area from Castroville to the Santa Cruz County line. The project will identify climate change impacts and related risks to multimodal transportation infrastructure in the project area. The study will then identify a suite of transportation and adaptation scenarios to remedy the identified climate-related vulnerabilities and evaluate the proposed adaptation approaches, including the economic impact of each of the identified adaptation approaches. The study is expected to be completed in Spring 2020 and study results will be incorporated into the next update of the MTP/SCS.

Response 1.6

The commenter states that improvements to and better use of the region's rail corridors could be amplified in the 2040 MTP/SCS. The commenter provides a list of rail-related topics that they recommend receive specific treatment in the 2040 MTP/SCS. This comment pertains to the 2040 MTP/SCS and not the Draft EIR. This comment is noted and does not require further response or revisions to the Draft EIR.
Responses to comments pertaining to the 2040 MTP/SCS are provided in Appendix K of the 2040 MTP/SCS. Briefly, as stated therein, Chapter 2 of the 2040 MTP/SCS discusses passenger and freight rail and the 2040 MTP/SCS includes several of the rail projects mentioned in the comment.

Response 1.7

The commenter provides language pertaining to the Big Sur Coast Highway Management Plan and requests that it be added to mitigation measure GEO-3(b), Hillside Stability Evaluation, in the Draft EIR. In response to this comment, page 263 of the Draft EIR has been revised as follows:

**GEO-3(b) Hillside Stability Evaluation**

If a 2040 MTP/SCS project requires cut slopes over 20 feet in height or is located in areas of bedded or jointed bedrock, the implementing agency shall ensure that hillside stability evaluations and/or specific slope stabilization studies are conducted by a qualified geotechnical expert. Projects shall follow the recommendations of these studies. Possible stabilization methods include buttresses, retaining walls and soldier piles. In addition, to sustain a functional long-term transportation system along the coast, the strategies identified in Caltrans’ 2004 *Big Sur Coast Highway Management Plan* shall be implemented where appropriate and when feasible. Applicable Big Sur Coast Highway Management Plan measures may include, but are not limited to: adaptation to the fluid landform; separation of the highway from the moving landform; and, temporary or permanent rockfall catchments.

Response 1.8

The commenter provides additional language pertaining to mitigating the impacts of sea level rise and requests that it be added to mitigation measure GHG-5, Sea Level Rise Adaptation, in the Draft EIR. The commenter recommends the addition of the language “...at least during the project life” to this measure. Mitigating beyond the anticipated life of the proposed project is unwarranted because impacts to operational transportation facilities would no longer occur. Mitigation measure GHG-5, on page 287, contains sea level adaptation practices very similar to the remaining recommendations provided by the commenter. For example, the commenter states that the mitigation should require transportation projects to have adaptive management options to contend with expected climate change impacts. Mitigation measure GHG-5 already contains language similar to commenter’s language: “...the implementing agency shall incorporate appropriate adaptation strategies to minimize hazards associated with sea level rise, such that project structures and other critical facilities would be located outside of an identified sea level rise inundation area...” Therefore, it is unnecessary to incorporate adaptive management language provided by the commenter into mitigation measure GHG-5 because it would be duplicative.

Response 1.9

The commenter requests that Draft EIR mitigation measure HAZ-6, Wildland Fire Risk Reduction, be revised to include measures to avoid introducing new or expanded development such as residential subdivisions, schools and hospitals into fire-prone, fire-controlled ecologies. In response to this comment, pages 310 and 311 of the Draft EIR have been revised as follows:
HAZ-6 Wildland Fire Risk Reduction

If an individual project included in the 2040 MTP/SCS is located within the wildland-urban interface or areas favorable for wildland fires such that project-specific CEQA analysis finds a significant risk of loss, injury or death from fire, the implementing agency shall require appropriate mitigation to reduce the risk. Examples of mitigation to reduce risk of loss, injury or death from wildfire include, but are not limited to:

- Avoid introducing new or expanded development such as residential subdivisions, schools and hospitals into fire-prone, fire-controlled ecologies (e.g., indigenous Monterey pine forest, Santa Cruz sand hills/knobcone pine forest, coastal maritime chaparral).
- Require adherence to the local hazards mitigation plan, as well as the local general plan policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, public outreach and service standards for fire departments.
- Encourage the use of fire-resistant vegetation native to the AMBAG region and/or the local microclimate of the project site, and discourage the use of fire-prone species especially non-native, invasive species such as pampas grass or giant reed.
- Require a fire safety plan be submitted to and approved by the local fire protection agency. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase of the project.
- Prohibit certain project construction activities with potential to ignite wildland fires during red-flag warnings issued by the National Weather Service for the project site location. Example activities that should be prohibited during red-flag warnings include welding and grinding outside of enclosed buildings.
- Require fire extinguishers to be onsite during construction of projects. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.
February 5, 2018

Maura Twomey, Executive Director
Association of Monterey Bay Area Governments (AMBAG)
24580 Silver Cloud Court
Monterey, CA 93940

DRAFT 2040 METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY AND DRAFT ENVIRONMENTAL IMPACT REPORT, ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

Dear Ms. Twomey:

Thank you for the opportunity to review your agency’s draft Moving Forward Monterey Bay 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and draft Environmental Impact Report (DEIR). We highly regard our partnership with the Association of Monterey Bay Area Governments (AMBAG) in strategically planning, financing, and achieving long-term goals for transportation in the region. Caltrans supports a MTP/SCS that is consistent with state and federal planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety.

Caltrans values the continuing, cooperative, and comprehensive partnership with AMBAG in integrating regional and state processes for planning the region’s transportation system. Your agency continues to be a leader in improving the ability to evaluate transportation policies and performance of that system through modeling by accounting for interregional trips which are critical in planning for system capacity.

Lastly, we commend AMBAG for producing an excellent plan addressing existing and future transportation needs in the Monterey Bay Area as well as land use, housing needs, supporting multi-modal options, greenhouse gas emission reduction, and improving overall transportation system efficiencies.

Please note our additional detailed comments are included in a separate attachment. If you have any questions, please contact me at (805)-549-3510 or kelly.mccleoden@dot.ca.gov

Sincerely,

[Signature]
Kelly McClendon
Senior Transportation Planner
Attachment

Detailed Comments by Caltrans
Draft AMBAG (MTP/SCS) 2040

General Comments:

- Caltrans commends the work of AMBAG staff on developing its draft MTP/SCS 2040. The document appears comprehensive, thorough and well organized. The high level of involvement that staff has coordinated with the public and stakeholder agencies, including Caltrans, is appreciated. This includes coordinating with the RTPAs in the region to develop a comprehensive plan, illustrative maps that depict complex information in a simple format, and a glossary that helps facilitate comprehension for public consumption.

- Caltrans also commends AMBAG for its extensive public outreach, including its GIS interactive web mapping and web site information on the draft MTP/SCS.

- For future MTP/SCS updates, AMBAG may want to consider forming a citizen’s technical advisory committee with varied representation from such groups as chambers of commerce, agriculture, freight, residential homeowner’s associations and other commercial and private industries. These groups would provide a different perspective than those from traditional governmental transportation agencies.

- The draft includes excellent documentation on public outreach activities in Appendix D.

Specific Comments:

Chapter 2:

- Page 2-12, under the “Bicycle Network” section it only discusses bicycle classification in terms of Class I, Class II and Class III. Please update this section to recognize that there are now four types of bikeways that includes Class IV which is a separated bikeway or cycle track. Instead of introducing this by stating that the “Bike lanes in the region are classified in three categories:…” it may be more clear to state that “There are four recognized bikeway classifications that include the following:” since a bike lane is more aligned with Class II specifically. Moreover the classification system does not necessarily define or correspond with bicycle traffic patterns.

- Page 2-13, Does Figure 2-3 reflect the existing and proposed Regional Bicycle Network to be reached by 2040? Or does the map reflect what only is existing now? Please clarify. Also, it is challenging to distinguish the color difference
between the green line for Class III and black lines for roads and freeways. A more contrasting color is recommended.

- Page 2-14, in the “Complete Streets” section, is it possible to discuss the State’s role in implementing Complete Streets as it relates to the State Highway System in the region. Specifically, the California State Bicycle and Pedestrian Plan, Toward an Active California lays out foundational policies and actions that Caltrans and its partner agencies will take to achieve the department’s ambitious statewide goals to double walking and triple bicycling trips by 2020. This is relevant to bicycle and pedestrian issues and needs on, across, and adjacent to the State Highway System within this region. More information about the plan can be accessed at: http://www.goactiveca.org/

- Would it be possible to add a section that discusses Park and Ride in the region? This includes existing and proposed park and ride lots and the plan for park and ride improvements moving into the future. Perhaps a park and ride map would be beneficial as well.

- Primary Air-Carrier airports with annual enplanements over 10,000 are required to have an Airport Ground Access Improvement Program per Government Code 65081.1. The Monterey Regional Airport is the only airport with 10,000 or more enplanements, and therefore requires AMBAG to complete an Airport Ground Access Improvement Program per Government Code 65081.1. It is noted that although the MTP specifically states, "...TAMC will develop this program in coordination with AMBAG," there is no date of completion projected. Has this process started? It is strongly recommended that AMBAG staff to review the link to California Law and Government Code 650801.1. https://law.justia.com/codes/california/2011/gov/title-7/65080-65086.5/65081.1/ there are portions of this required plan provided in further paragraphs, although not a completed plan.

Chapter 6:

- Chapter 6 (Public Participation) should include Title VI information regarding public outreach efforts. See pages 74-80 of the California Transportation Commission’s 2017 Regional Transportation Plan Guidelines for Metropolitan Planning Organizations. Go to: http://cact.ca.gov/programs/rtp/docs/rtp-2017-guidelines-mpos-011817.pdf
Appendices:

Appendix J: Regional Transportation Plan Checklist for MPOs:

General

- Pursuant to 23 CFR 450.324(b), the RTP shall include both long-range and short-range strategies/actions. Please provide more detail for the short-range strategies that will be used to help meet the long-range goals and requirements of this plan by 2040.

- Item (h): Please add page number 4-38 to checklist.

Consultation/Cooperation

- Item (i) (ii) Appendix D: mentions a timely notice was included in regards to the comment period but does not show the press releases, flyers, or dates of the notice. We recommend providing a table with the dates, times, and outcomes from the comment period. Please add this information to the RTP pursuant to 23 CFR 450.316(a).

- Item (viii): Please discuss whether or not an additional opportunity for public comment was necessary. Please add this information to the RTP pursuant to 23 CFR 450.316(a).

- Item 1 (x): Please discuss the effectiveness of the procedures and strategies utilized in order to measure and ensure full participation during the comment period. Please add this information to the RTP pursuant to 23 CFR 450.316(a).

- Item 8: There is no indication of the comment period duration within the cited pages on the checklist. Please add this information to the RTP pursuant to 23 CFR 450.316(a) and 23 CFR 450.316(a)(i).

Title VI and Environmental Justice

- Item 1: Please add page numbers 5-6, 5-8, and 5-10 to checklist.

Modal Discussion

- Item 5: Please add page number 2-12 to checklist
- Item 7: Please change the page number provided to page 2-14.
Programming/Operations

- The list of projects in Appendix C does not make it clear which projects are unconstrained and constrained. Please provide a clear delineation of which projects are part of the constrained and unconstrained lists.

Financial

- Item 4: The lists cited for financially constrained projects are unclear and too generalized. Please provide more detail pursuant to Government Code 65080 (4)(a).

- Item 7: There is no explicit mention of consistency between the RTP and ITIP. Please provide a statement regarding consistency pursuant to the 2016 STIP Guidelines Section 33.

- Item 8: There is no explicit mention of consistency between the RTP and RTIP. Please provide a statement regarding consistency pursuant to the 2016 STIP Guidelines Section 19.

Environmental

- Item 1: Please add EIR Document page number to checklist.
- Item 4: Please add EIR Document page number to checklist.
Detailed Comments by Caltrans
Draft 2040 MTP/SCS and RTPs for Monterey, San Benito, and Santa Cruz Counties
Draft Environmental Impact Report
SCH#2015121080

Chapter 4.4 Biological Resources, a. Terrestrial Vegetation Communities beginning page 163

General comment:

Make sure the scientific names for the plant species are current throughout. For example Herbaceous Habitats pg. 169: purple needlegrass was reclassified. Replace Nassella pulchra with Stipa pulchra.

e. Wildlife Movement Corridors, pg. 182

Would be helpful if a general map of the corridor locations is included with this discussion.

Mitigation Measures, starting pg. 191

B-1 (e) Endangered/Threatened Animal Species Avoidance and Compensatory Mitigation pg. 192-193

Mitigation requirements can vary with the project scope and species, on site mitigation that includes a restoration plan should also be an option.

B-1(f) Endangered/Threatened Animal Species Avoidance and Compensatory Mitigation pg. 193-194

2nd bullet pg. 193. The type of fencing required for a particular species may not be “orange construction fencing”. The description for the fencing should be generic and simply state that Environmental Sensitive Area fencing shall be installed.

3rd bullet pg. 193. Although April to October 31 is a typical work window in aquatic habitats, this is a programmatic EIR and project specific measures can be different. Would be more appropriate to state that work shall be completed during the dry season typically between April 1 and October 31.

5th bullet pg. 194. States: No equipment shall be permitted to enter wetted portions of any affected drainage. It is common for projects to require dewatering, which may require some type of equipment in the drainage.
B-1(g) Non-Listed Special Status Animal Species Avoidance and Minimization pg. 194 - 195

3rd bullet pg. 195. Discussion on bats.

Although the measures outlined are appropriate, presence/absence surveys for bats should be conducted early in project development during the environmental document/biological study phase of the project. The measures would need to be identified in the construction contract prior to the contract going out for bid, especially the 2nd and 3rd measure.

In addition, the second recommendation for providing alternative roosts combined with the third recommendation would need to be implemented long before construction begins to allow the bats time to leave the area or learn to use the alternative roosts. That could be as much as a year prior to construction for the alternative roosts.

Significance after Mitigation, pg. 196, starting with 4th sentence.

Document States:

“However, there are no state or federal statutes that provide protection to other sensitive plant and wildlife species such as candidate species, plant species determined to be rare by the CNPS or wildlife species classified as California Species of Special Concern. No additional feasible mitigation measures are available to reduce impacts on other sensitive species. Therefore, it cannot be guaranteed that all future project-level impacts to special status species can be mitigated to a less than significant level for all species and impacts would remain significant.”

Comment:

Since CEQA and NEPA require analysis of impacts to sensitive species as well as listed species, the conclusions are somewhat misleading. Although it is true that it cannot be guaranteed that all future project-level impacts to special status species including listed species can be mitigated to less than significant, the avoidance and minimization measures that are outlined for listed species to reduce impacts to less than significant also apply to candidate species, rare CNPS, and California Species of Special Concern.

B-3 (c) Construction Best Management Practices to Minimize Disruption to Wildlife, pg 203

2nd bullet restricting construction to daylight hours is not always possible depending on the location and traffic conditions. Should rephrase to state that when feasible construction will be limited to daylight hours.
Since BMPs for fencing measures can vary for species and location, references for the literature for those measures should be included.
Response 2.1

The commenter provides a list of comments pertaining to the 2040 MTP/SCS. This comment pertains to the 2040 MTP/SCS and not the Draft EIR, and does not raise significant environmental issues. This comment is noted and does not require further response or revisions to the Draft EIR. Please refer to Appendix K of the 2040 MTP/SCS for responses to comments pertaining to the 2040 MTP/SCS.

Response 2.2

The commenter states that the most current scientific names for plant species should be used throughout the discussion of terrestrial vegetation communities in Section 4.4, Biological Resources, of the Draft EIR.

In response to this comment, the following page of the Draft EIR has been revised as follows:

Page 169:

Herbaceous Habitats

These habitats are generally comprised of areas dominated by grasses and other non-woody species. The majority of this habitat in Monterey, San Benito and Santa Cruz counties is comprised of non-native grasslands (Figure 15, Figure 16 and Figure 17). Native perennial grasslands, which are dominated by perennial bunch grasses, such as purple needlegrass (*Nassella pulchra* *Stipa pulchra*), were historically abundant within Monterey, San Benito and Santa Cruz counties but are now currently patchy in distribution statewide. The following are descriptions of the grass and herb-dominated habitats that occur within three miles of construction projects outlined in the 2040 MTP/SCS.

Response 2.3

The commenter requests that a figure be added to the Draft EIR that shows the location of the wildlife movement corridors referred to in the discussion of wildlife movement corridors in Section 4.4, Biological Resources, of the Draft EIR.

As described on page 183 of the Draft EIR, mountainous regions in the AMBAG region may support wildlife movement on a regional scale, and riparian corridors and waterways may provide more local-scale opportunities for wildlife movement. Riparian corridors and waterways within the AMBAG region are too plentiful to depict on a figure, and even if it were feasible to produce such a figure, it would not be necessary to support the programmatic evaluation of wildlife movement impacts in the Draft EIR. Page 183 also describes three essential connectivity areas identified by the California Department of Wildlife within the region. In accordance with CEQA, project-level effects on wildlife movement corridors will be evaluated during project-level environmental review of land development and transportation projects included in the 2040 MTP/SCS.
Response 2.4

The commenter requests that mitigation measure B-1(e) be revised to include the option of a restoration plan for project-specific mitigation. Mitigation measure B-1(e) on pages 192 and 193 of the Draft EIR requires a qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP) to ensure the success of on- and/or off-site mitigation sites. As described in mitigation measure B-1(e), the HHMP shall determine if the conservation site has the restoration needs to function as a successful mitigation site. Because mitigation measure B-1(e) already requires an HHMP, and the restoration plan would be duplicative of the contents of an HHMP, revisions to the Draft EIR in response to this comment would not be necessary.

Response 2.5

The commenter requests minor modifications to mitigation measure B-1(f) pertaining to construction fencing, construction season dates, and the operation of vehicles within waterways. In response to this comment, the following pages of the Draft EIR have been revised as follows:

Pages 193 and 194:

*B-1(f) Endangered/Threatened Species Avoidance and Minimization During Construction*

The following measures shall be applied to aquatic and terrestrial species, where appropriate. Implementing agencies shall select from these measures as appropriate depending on site conditions, the species with potential for occurrence and the results of the biological resources screening and assessment (measure B-1(a)).

- Pre-construction surveys for federal and/or state listed species with potential to occur shall be conducted where suitable habitat is present by a qualified biologist not more than 48 hours prior to the start of construction activities. The survey area shall include the proposed disturbance area and all proposed ingress/egress routes, plus a 100-foot buffer. If any life stage of federal and/or state listed species is found within the survey area, the appropriate measures in the BO or Habitat Conservation Plan (HCP)/Incidental Take Permit (ITP) issued by the USFWS/NMFS (relevant to federal listed species) and/or the ITP issued by the CDFW (relevant to state listed species) shall be implemented; or if such guidance is not in place for the activity, the qualified biologist shall recommend an appropriate course of action, which may include consultation with USFWS, NMFS and/or CDFW. The results of the pre-construction surveys shall be submitted to the implementing agency for review and approval prior to start of construction.

- Ground disturbance shall be limited to the minimum necessary to complete the project. The project limits of disturbance shall be flagged. Areas of special biological concern within or adjacent to the limits of disturbance shall have Environmental Sensitive Area highly visible orange construction fencing installed between said area and the limits of disturbance.

- All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed during the dry season, typically between April 1 and October 31, to avoid impacts to sensitive aquatic species.

- All projects occurring within or adjacent to sensitive habitats that may support federally and/or state endangered/threatened species shall have a qualified biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct
Appendix F: Response to Comments

daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW and/or USFWS/NMFS or as outlined in project permits, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are begin fully implemented.

- No endangered/threatened species shall be captured and relocated without authorization from the CDFW and/or USFWS/NMFS.
- If pumps are used for dewatering activities, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system.
- If at any time during construction of the project an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. At that point, a qualified biologist shall recommend an appropriate course of action, which may include consultation with USFWS, NMFS and/or CDFW. Alternatively, the appropriate measures shall be implemented in accordance with the BO or HCP/ITP issued by the USFWS (relevant to federal listed species) and/or the ITP issued by the CDFW (relevant to state listed species) and work can then continue as guided by those documents and the agencies as appropriate.
- All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
- No equipment shall be permitted to enter wetted portions of any affected drainage channel other than equipment necessary to conduct approved dewatering activities required for project construction.
- All equipment operating within streambeds (restricted to conditions in which water is not present) shall be in good conditions and free of leaks. Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access.
- At the end of each work day, excavations shall be secured with cover or a ramp shall be provided to prevent wildlife entrapment.
- All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.

Response 2.6

The commenter requests that mitigation measure B-1(g) be revised to require pre-construction surveys for special-status bat species more than 30 days in advance of commencement of construction. The commenter suggests that conducting surveys within 30 days of construction would not allow sufficient time to implement additional bat protection measures listed in mitigation measure B-1(g), including establishing alternative roost sites and installation of bat exclusion devices.

Conducting surveys earlier than 30 days prior to the start of project construction would allow time for bats to take roost or inhabit the project site between the survey date and the planned construction start date. These bats would therefore not be observed or found during surveys, and would potentially be at risk of unintentional impacts from construction activities. Additionally,
guidance from CDFW\(^1\) recommends conducting bat surveys no more than 14 days prior to the start of construction. Conducting the surveys long before construction, as suggested in the comment, would be increasingly inconsistent with the CDFW guidance.

Bat protection measures outlined in mitigation measure B-1(g) include postponing construction within 250 feet of a maternity colony; installation of alternative roosts such as bat boxes; and installation of exclusion devices. Such measures would not require more than 30 days to implement, should they be required. Bat Conservation International states that when exclusion devices are installed, the devices should remain in place for a minimum of seven days to ensure that all bats have vacated the roost and cannot regain access.\(^2\) Therefore, these devices would not need to be installed long before construction, but instead within approximately seven days of construction.

**Response 2.7**

The commenter states that the significance after mitigation discussion for Impact B-1, on page 196 of the Draft EIR, is somewhat misleading in describing that statutes do not provide protection to sensitive species that are not considered special-status species, such as candidate species, plant species determined to be rare by the CNPS or wildlife species classified as California Species of Special Concern. The commenter states that CEQA and NEPA extends to all sensitive species, and mitigation measures that apply to special-status species in the Draft EIR would also apply to these sensitive species.

The commenter is correct that the CEQA thresholds of significance in the Draft EIR include project effects on “rare” species, which extends beyond federal and state listed endangered species. Several mitigation measures for Impact B-1 apply to these species. For example, mitigation measure B-1(g), Non-Listed Special Status Animal Species Avoidance and Minimization, outlines measures to reduce impacts to non-listed special status animal species. In addition, mitigation measure B-1(h) requires preconstruction surveys for nesting birds, including non-listed species.

The discussion of significance after mitigation on page 196 of Draft EIR states that compliance with the required measures would reduce impacts to special status species and their habitat to less than significant level. It further explains that there are federal and/or state statutes that prohibit the take of protected species, which includes federal and state listed species, state rare plants and fully protected species. When these statutes are considered in combination with the mitigation measures for Impact B-1 – which mitigate impacts to non-special status species - impacts would be less than significant. Revisions to the Draft EIR are therefore not necessary in response to this comment.

**Response 2.8**

The commenter requests that mitigation measure B-3(c) be revised to allow for night-time construction when site or project conditions make daylight construction infeasible. In response to this comment, the following page of the Draft EIR has been revised as follows:

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\(^1\) California Department of Fish and Wildlife (CDFW). 2013. Appendix I CDFW’s Conservation Measures for Biological Resources that may be Affected by Program-level Actions. Available at: http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=73979

**Appendix F: Response to Comments**

**B-3 (c) Construction Best Management Practices to Minimize Disruption to Wildlife**

The following construction Best Management Practices (BMPs) shall be incorporated into all grading and construction plans in order to minimize temporary disruption of wildlife, which could hinder wildlife movement:

- Designation of a 20 mile per hour speed limit in all construction areas.
- **Whenever feasible**, daily construction work schedules shall be limited to daylight hours only.
- Mufflers shall be used on all construction equipment and vehicles shall be in good operating condition.
- All trash shall be placed in sealed containers and shall be removed from the project site a minimum of once per week.
- No pets are permitted on project site during construction.

**Response 2.9**

The commenter requests that the Draft EIR include references to data and literature sources that describe the various types of fencing measures that could be used to prevent disruption of wildlife movement and connectivity.

The 2040 MTP/SCS contains many projects that would be implemented throughout Santa Cruz, San Benito and Monterey counties. These projects would occur in varying habitat types, terrain and site conditions. Considering the variability and site-specific conditions that could be encountered, many different types of fence designs could be developed and implemented to reduce impacts on wildlife movement. It is not necessary to narrow the design to fences described in literature at this programmatic level of environmental review. Rather, fencing design and requirements should be designed at project-level review, generally consistent with mitigation measure B-3(a) on page 202 of the Draft EIR.
February 5, 2018

Heather Adamson
AMBAG
24580 Silver Cloud Ct.
Monterey, CA 93940

Email: hadamson@ambag.org

Re: Draft EIR for the 2040 MTP/SCS and RTPs for Monterey, San Benito and Santa Cruz Counties

Dear Ms. Adamson:

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the Draft EIR for the 2040 MTP/SCS. We found that the document adequately addressed the issues identified in the comments the Air District submitted during the comment period for the NOP. However, we do have some additional comments:

Mitigation Measure AQ-3, Project-Level PM10 Emissions Reduction, Page 153
One of the mitigation measures for excessive PM10 emissions is to provide funding through the Air District’s Carl Moyer Memorial Grant Program. While this program does reduce quantifiable emissions, a specific program could be developed to provide emissions offsets specific to transportation and land use projects. The Air District requests that AMBAG work with the Air District to initiate an offset emission reduction program. Please contact David Frisbey, Planning and Air Monitoring Manager, at the Air District office at (831) 647-9411 or dfrisbey@mbard.org for assistance in developing an offset program.

Mitigation Measure GHG-1, Construction GHG Reduction Measures, Page 280
This section suggests the use of diesel construction equipment meeting CARB’s Tier 2 certified engines or cleaner off-road heavy duty diesel engines. Please make this measure consistent with Mitigation Measure AQ-2(b) Diesel Equipment Emissions Standards on page 151 which recommends the use of Tier 4 certified engines to the maximum extent feasible.

In addition to the comments on the Draft EIR, the Air District has the following general comments on the MTP and the Counties’ RTPs:

- A major hurdle to completing transportation projects is inadequate funding. In the long term, the limited completion of projects will result in more congestion and increased emissions. Unfortunately, many of the transportation projects are focused on maintaining and expanding existing road networks and not enough on active transportation. The Air District suggests that active transportation projects have a higher priority in scheduling and funding.

- Prioritize the use of roundabouts at new intersections and adaptive signal control at existing intersections.

- Since much of the areas’ congestion is due to people traveling in single occupancy vehicles, a higher priority needs to be given to transportation projects that focus on the reduction of vehicle miles traveled.

- Expand the development of projects electrifying the medium to heavy-duty truck fleets as they are a significant source of regional emissions.

- Emphasize a transition away from fossil fuels for bus and para-transit fleets in the region.

Richard A. Stedman, Air Pollution Control Officer
• Promote guidelines for developing regional, County and municipal and codes to support the development of electric vehicle infrastructure.

• Consider development around emerging technologies such as connectivity, autonomous vehicles, carsharing programs and fleet modernization. Discuss the expansion of these technologies and their impact on traffic congestion.

Please let me know if you have any questions. I can be reached at (831) 647-9418 ext. 234 or dfrisbey@mbard.org.

Best Regards,

[Signature]

David Frisbey
Planning and Air Monitoring Manager

cc: Alan Romero, Hanna Muegge, Chris Duymich
Response 3.1
The commenter states that the Draft EIR adequately addresses the issues that they identified in response to the Notice of Preparation of the Draft EIR. This comment is noted.

Response 3.2
The commenter states that with regard to Draft EIR mitigation measure AQ-3, a specific program could be developed to provide PM_{10} emissions offsets specific to transportation and land use projects. The commenter requests that AMBAG work with the Monterey Bay Air Resources District (MBARD) to initiate this type of program.

As shown in Table 12 on page 152 of the Draft EIR, land use emissions would account for the majority of PM_{10} emissions (approximately 98 percent) under implementation of the 2040 MTP/SCS. Local governments are the main agencies responsible for mitigation of the impacts of land use plans and projects that implement the SCS, and AMBAG has no concurrent authority to mitigate the impacts of land use plans and projects, including PM_{10} emissions impacts, as described on page 81 of the Draft EIR. Therefore, the suggested mitigation measure would not be effective for AMBAG to adopt or include in the Draft EIR because AMBAG has no concurrent authority to require local governments in the region to implement or adopt the mitigation measure. However, AMBAG supports efforts to reduce PM_{10} emissions in the region and would consider assisting MBARD with development of a program described in the comment, as needed, should MBARD decide to develop such a program.

Response 3.3
The commenter states that Draft EIR mitigation measure AQ-2(b) recommends the use of Tier 4 certified engines to the maximum extent possible. The commenter requests that Draft EIR mitigation measure GHG-1 be made consistent with mitigation measure AQ-2(b). In response to this comment, the following pages of the Draft EIR have been revised as follows:

Pages 280 and 281:

GHG-1 Construction GHG Reduction Measures
The implementing agency shall incorporate the most recent GHG reduction measures and/or technologies for reducing diesel particulate and NOX emissions measures for off-road construction vehicles during construction. The measures shall be noted on all construction plans and the implementing agency shall perform periodic site inspections. Current GHG-reducing measures include the following:

• Use of diesel construction equipment meeting CARB’s Tier 24 certified engines wherever feasible for or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation. Where the use Tier 4 engines is not feasible, Tier 3 certified engines shall be used; where Tier 3 engines are not feasible, Tier 2 certified engines shall be used;
• Use of on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
• All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the five minute idling limit;
• Use of electric powered equipment in place of diesel powered equipment when feasible;
• Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
• Use of alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel, in place of diesel powered equipment for 15 percent of the fleet; and Use of materials sources from local suppliers; and
• Recycling of at least 50 percent of construction waste materials.

Response 3.4

The commenter provides a list of recommendations for the 2040 MTP/SCS. This comment pertains to the 2040 MTP/SCS and not the Draft EIR. This comment is noted and does not require further response or revisions to the Draft EIR.

Responses to comments pertaining to the 2040 MTP/SCS are provided in Appendix K of the 2040 MTP/SCS. Briefly, as stated therein, recommendations provided in this comment are generally either included in the 2040 MTP/SCS or pertain to areas or subjects that AMBAG continues to study and evaluate and incorporate into updates to the MTP/SCS as appropriate.
February 5, 2018

Ms. Heather Adamson  
Director of Planning  
AMBAG  
24580 Silver Cloud Court  
Monterey, CA 93940

RE: Draft Environmental Impact Report - 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy

Dear Ms. Adamson:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy. The City has the following comments:

1. **Overall Comment on North of Boronda Future Growth Area (FGA):** Please confirm that the EIR analysis includes the “North of Boronda Future Growth Area” which is located within the existing City limits of Salinas. The DEIR analysis should also address the 2007 “Final Supplement – General Plan Final Program EIR” (FSEIR) that covers the Sphere of Influence and Annexation of the North of Boronda FGA. The annexation covered 2,388 gross acres with approximately 12,000 units and 4 million square feet of non-residential uses.

2. **Additional City Documents in compliance with the California Environmental Quality Act (CEQA):** Chapter 8 (References and Preparers) of the DEIR, page 488 lists only one reference for the City of Salinas: “2002 General Plan”. It should also include the General Plan 2002 FEIR, which was consulted to prepare this DEIR, and the General Plan 2007 FSEIR, which addressed Greenhouse Gases citywide. There are other additional City documents including the Housing Element 2015-2023 (and MND) in 2015, and the Economic Development Element (and EIR) of the General Plan in 2017, which should also be included. Additionally, these documents should be mentioned in the background discussion of the City-County General Plans on page 369.

3. **DEIR Mitigations and Project Specific Mitigations:** The Executive Summary of the DEIR states on page 5: “Transportation project implementing agencies can and should implement these measures. For land use projects implementing the 2040 MTP/SCS, cities and counties in the AMBAG region can and should implement these measures, where relevant. Project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.” We also noted that there are many topics, which describe mitigations and then state: “Project-specific environmental documents may adjust these
mitigation measures as necessary to respond to site-specific conditions." Some of the sections where this language is noted include:

- 4.1 Aesthetics /Visual Resources (page 100)
- 4.2 Agriculture and Forestry Resources (page 122)
- 4.3 Air Quality and Health Impacts /Risks (page 156)
- 4.4 Biological Resources (B-3 on page 202)
- 4.5 Cultural and Historic Resources (pages 222, 224, 225)
- 4.7 Geology and Soils (page 260)
- 4.8 Greenhouse Gas Emissions /Climate Change (pages 280, 285, 287)
- 4.9 Hazards and Hazardous Materials (page 307, 310)
- 4.10 Hydrology and Water Quality (page 337)
- 4.12 Noise (page 378)
- 4.14 Transportation and Circulation (page 415)

However, there are other DEIR Mitigations that appear to be compulsory with no flexibility for project-specific adjustments. This appears to be the case (for example) with the mitigations proposed for Biological Resources (pages 191-200, especially riparian habitat) and BMP during construction (on page 200). We understood that none of the mitigations would be compulsory for jurisdictions and therefore would request clarification if this is the case or not. We would also request that the applicability of the mitigation measures to individual jurisdictions be addressed in each of the mitigation sections in a consistent manner.

<table>
<thead>
<tr>
<th>Page</th>
<th>Topic</th>
<th>Comment/Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>38</td>
<td>1.2.1.1 Streamlining under SB 375</td>
<td>Please include the definitions of &quot;major transit stop&quot; and &quot;high-quality transit corridor.&quot;</td>
</tr>
<tr>
<td>48</td>
<td>FAST Act requirements of planning process</td>
<td>&quot;requires that the planning process include public ports and private transportation providers&quot; Should this include Monterey AirBus, Silicon Valley employer buses in Santa Cruz County?</td>
</tr>
<tr>
<td>62</td>
<td>2.4 Transportation Program - Rail Projects</td>
<td>MST and County Express connections to Caltrain are not mentioned (compare this to page 360 and page 396).</td>
</tr>
<tr>
<td>74</td>
<td>Programs supported by AMBAG and partner agencies</td>
<td>8. &quot;Regional Ecological Framework Project&quot; - Please clarify what this project is.</td>
</tr>
<tr>
<td>78</td>
<td>Regional Transportation System - Monterey County</td>
<td>No mention of the Amtrak station in Salinas or the MST service (Line 55) to Caltrain in Gilroy and Diridon Station in San Jose, which also services Amtrak and Megabus</td>
</tr>
<tr>
<td>226</td>
<td>4.5 Cultural and Historic Resources - CR-3 Paleontological Resources Impact Minimization</td>
<td>&quot;The implementing agency of a 2040 MTP/SCS project involving ground disturbing activities (including grading, trenching, foundation work and other excavations) shall retain a qualified paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist (SVP 2010).&quot; No citation in the references. The document title is &quot;Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources&quot; authored by the SVP Impact Mitigation Guidelines Revision Committee. Date of 2010 is correct.</td>
</tr>
<tr>
<td>349</td>
<td>Land Use: Salinas General Plan</td>
<td>No mention of 2007 North of Boronda FGA Sphere of Influence Amendment and Annexation or 2015 - 2023 Housing Element. Should also include the City’s Economic Development Element, approved in December 2017.</td>
</tr>
<tr>
<td>386</td>
<td>Table 45: Forecasted AMBAG Population Growth 2015-2040</td>
<td>Suggest adding a column to the right of the &quot;Percentage Change: Units Change (2015-2040)&quot; to help communicate the magnitude of changes. For example, Del Rey Oaks is going to increase 80%, however, that is 1,332 units vs. Salinas which will increase 16%, but that is 25,113 units.</td>
</tr>
<tr>
<td>394</td>
<td>State Highway 183</td>
<td>Please revise as follows: &quot;Bernal Drive/North Main Street.&quot;</td>
</tr>
<tr>
<td>396</td>
<td>Public Transit Systems</td>
<td>&quot;MST also provides service to the Watsonville Transit Center in Santa Cruz county and the Gilroy Caltrain station in Santa Clara county.&quot; Line 55 also provides service to the San Jose Diridon rail station (Amtrak, Caltrain, Megabus).</td>
</tr>
<tr>
<td>397</td>
<td>Transit/Taxi services</td>
<td>Should include discussion of private services such as Uber.</td>
</tr>
<tr>
<td>399</td>
<td>Bicycle Facilities</td>
<td>Class IV bikeways are mentioned as a Caltrans classification. Are there any proposed in the region? (Are new classifications created after local bikeway master plans are adopted?)</td>
</tr>
<tr>
<td>400</td>
<td>Transportation Demand Management</td>
<td>No mention of employer shuttles (e.g. CHOMP).</td>
</tr>
<tr>
<td>400</td>
<td>Intermodal Transportation</td>
<td>Are all-public transportation buses equipped with bicycle racks? If not, this issue should be addressed.</td>
</tr>
</tbody>
</table>
Letter to AMBAG  
DEIR - MTP/SCS  
February 5, 2018  
Page 37

| 411 | Table 50- Percentage of Commuter Trips by Mode Within 30 Minutes - Peak period | Percentages are unclear. It looks as if "Drive Alone" and "Carpool" are the same category and "Active Transportation" may make up the remaining percentage. Please clarify. |

Again, thank you for the opportunity to review and comment on this document. Please feel free to contact me directly with any questions you may have or to further discuss the comments in this letter.

Sincerely,

Tara Hullinger  
Advanced Planning Manager

Cc: Megan Hunter
COMMENTER: Tara Hullinger, Advanced Planning Manager, City of Salinas

DATE: February 5, 2018

Response 4.1

The commenter requests confirmation that the analysis in the Draft EIR includes the “North of Boronda Future Growth Area” in the City of Salinas. The commenter also states that the Draft EIR analysis should address the 2007 Final Supplemental-General Plan Final Program EIR that was prepared for annexation of the future growth area.

As stated on pages 4 to 6 of the 2040 MTP/SCS, the SCS assumed that the AMBAG Regional Growth Forecast (three county total) is a constraint (fixed upper limit) to the amount of total development in the region and the majority of growth is restricted to the Spheres of Influence of any given city. All growth in the SCS is consistent with General Plans and was based on direction from jurisdiction planning staff. Therefore, the SCS and Draft EIR address impacts associated with the 2007 sphere of influence and annexation of the North of Boronda Future Growth Area.

Response 4.2

The commenter states that Section 8, References and Preparers, of the Draft EIR should include the City of Salinas 2002 General Plan EIR, 2007 Final Supplemental-General Plan Final Program EIR, Housing Element 2015-2023 and associated 2015 MND, and the Economic Development Element and EIR that was added to the City of Salinas General Plan in 2017. The commenter also states that these documents should be mentioned in the discussion of the City and County General Plans on page 369 of the Draft EIR.

In response to this comment, Section 8, References and Preparers, of the Draft EIR has been revised to incorporate citations for aforementioned documents. Specifically, page 488 in Section 8 of the Draft EIR has been revised as follows:


Page 369 of the Draft EIR provides a discussion of the typical groundborne vibrations caused by construction equipment, and does not describe City or County General Plans. However, a discussion of the City and County General Plans in the region is provided on pages 347 through 351 of the Draft
Appendix F: Response to Comments

EIR. The City of Salinas General Plan, specifically, is described on page 349. Therefore, in response to this comment, page 349 of the Draft EIR has been revised as follows:

City of Salinas General Plan

The City of Salinas General Plan (City of Salinas, 2002a) was adopted in 2002. Since the last comprehensive update in 1988, the city grew substantially and is now the largest city in Monterey County. The major focus of this General Plan is how to protect valuable agricultural resources while promoting a diversified economy. This General Plan includes the following elements: Land Use, Community Design, Housing, Conservation/Open Space, Circulation, Safety and Noise (City of Salinas, 2002a). To plan for and manage future growth, the General Plan identified areas primarily to the north and east of Salinas, currently outside of the city’s boundaries, as the “Future Growth Area.” The City of Salinas subsequently amended its Sphere of Influence boundary and annexed the Future Growth Area. The Final Supplement for the Salinas General Plan Final Program EIR (City of Salinas, 2007), was prepared to evaluate the proposed Sphere of Influence amendment and annexation. The document also addresses citywide GHG emissions and global climate change.

Pursuant to State requirements, the General Plan Housing Element is periodically updated. The current Housing Element, City of Salinas 2015-2023 Housing Element (City of Salinas, 2015b), was adopted on December 15, 2015. The 2015-2023 Housing Element Initial Study-Negative Declaration (City of Salinas, 2015a), was prepared to evaluate the update to the Housing Element. The city also approved an Economic Development Element in 2017 (City of Salinas, 2017).

Response 4.3

The commenter states that the Draft EIR presents some mitigation measures, such as biological resources mitigation measures beginning on Draft EIR page 191, as compulsory with no flexibility for project-specific adjustments by the implementing agency or local jurisdictions. The commenter states that it was their understanding all mitigation measures in the Draft EIR would be non-compulsory for local jurisdictions implementing projects, and requests clarification if this understanding is accurate. The commenter also requests that the applicability of mitigation measures to local jurisdictions be presented consistently throughout the Draft EIR.

The mitigation measures are presented for applicable impacts to the resources and issue areas throughout Section 4, Environmental Impact Analysis, of the Draft EIR. For each impact with mitigation measures provided, the mitigation measures are prefaced with a discussion of the applicability of the mitigation measure with regard to cities and counties in the AMBAG region. In each instance, including biological mitigation measures starting on page 191 of the Draft EIR, the mitigation measure preface states that cities and counties in the AMBAG region “can and should” implement the mitigation measures, where relevant. In each instance, including biological mitigation measures starting on page 191 of the Draft EIR, the mitigation measure introduction states that project-specific environmental documents may adjust the mitigation measures as necessary to respond to site-specific conditions. Therefore, because the Draft EIR consistently presents mitigation measures throughout as “non-compulsory” recommendations for cities and counties in the AMBAG region that “can and should” be implemented, and states that mitigation measures may be adjusted, revisions to the Draft EIR are not necessary.
Response 4.4

The commenter requests that definitions for “major transit stop” and “high quality transit stop” be added to the discussion of streamlining under SB 375 on page 38 of the Draft EIR. In response to this comment, page 38 of the DEIR has been revised as follows to include definitions for “high quality transit corridor” and “major transit stop”:

1.3.1.1 Streamlining Under SB 375

SB 375 provides streamlining benefits for Transit Priority Projects (TPP) and certain mixed use projects. (See PRC Sections 21155 et seq.) For details, see the Governor’s Office of Planning and Research’s flow charts on SB 375 streamlining (Governor’s Office of Planning and Research 2011). A TPP is a project that meets all of the criteria summarized below. For the purposes of this EIR, geographic areas that meet the TPP requirements are referred to as Transit Priority Areas (TPAs).

- Consistent with the general land use designation, density, building intensity and applicable policies specified for the project area in the SCS;
- Located within half a mile of a major transit stop or high-quality transit corridor;
- Comprised of at least 50 percent residential use based on total building square footage, or as little as 26 percent residential use if the project has a floor area ratio of not less than 0.75; and
- Built out with a minimum of 20 dwelling units per acre (PRC § 21155).

A major transit stop is defined in Section 21064.3 of California Public Resources Code as a site with an existing rail station or the intersection of two or more major bus routes with a 15 minute headway during peak morning and afternoon commute periods. SB 375 defines a high quality transit corridor as a corridor that contains transit service with 15 minute frequencies during peak period.

Response 4.5

The commenter asks if the summary of the Fixing America’s Surface Transportation (FAST) Act on page 48 of the Draft EIR should also include private transportation providers, such as Monterey AirBus and Silicon Valley employer buses in Santa Cruz County.

The FAST Act does apply to certain private providers of transportation, including intercity bus operators and employer-based commuting programs. Therefore, the transportation planning requirements of FAST Act do include Monterey AirBus and Silicon Valley employer buses in Santa Cruz County. However, as the summary on page 48 of the Draft EIR is a general overview of the regulation and not intended to list every private transportation provider in the region, revisions to the Draft EIR are not necessary.

Response 4.6

The commenter states that Section 2.4, 2040 MTP/SCS Transportation Projects, of the Draft EIR does not describe the Monterey-Salinas Transit (MST) and San Benito County Express connections to Caltrain in the discussion of rail projects.

Section 2.4, 2040 MTP/SCS Transportation Projects, provides a generalized summary of the types of transportation projects comprising the MTP, and is not intended to provide an exhaustive list of
each project included in the 2040 MTP/SCS. A full list of projects by type and jurisdiction is provided in Appendix B of the Draft EIR.

Response 4.7

The commenter requests clarification regarding the Regional Ecological Framework Project referenced on page 74 of the Draft EIR.

The Regional Ecological Framework Project is a project that produces a series of maps identifying sensitive resource areas near planned regional transportation projects in the Monterey Bay Area Region (AMBAG, n.d.). The maps allow transportation agencies in the region to identify sensitive resources and develop mitigation early in the project planning process. Additional information on the Regional Ecological Framework Project can be found on page 4-32 of the 2040 MTP/SCS.

Response 4.8

The commenter states that Section 3.3, Regional Transportation System, of the Draft EIR does not describe the Amtrak station in Salinas or the MST service to Caltrain in Gilroy or the Diridon Station in San Jose.

The Amtrak station in Salinas is discussed in the fifth paragraph of Section 3.3, Regional Transportation System, on page 78 of the Draft EIR. Specifically, this paragraph includes the following sentence: “Amtrak provides rail services twice daily via a station stop in Salinas.”

Page 78 of the Draft EIR has been revised as follows to describe MST service to stations in Gilroy and San Jose:

Both passenger and freight rail service are available in Monterey County. Amtrak provides rail services twice daily via a station stop in Salinas. Four freight stations are located at Castroville, Gonzales, Salinas and Watsonville Junction (Pajaro Community Area). Public transit services are provided by Monterey-Salinas Transit (MST) and Greyhound Lines. MST is a publicly owned and operated system providing service to the greater Monterey and Salinas areas with routes serving Carmel Valley and unincorporated areas in northern Monterey County. Additionally, MST provides service to some locations in Santa Clara County, including the Caltrain Station in the City of Gilroy and the Diridon Train Station in the City of San Jose, as well as the Watsonville Transit Center in Santa Cruz County. Greyhound provides intercity passenger service between Monterey Peninsula cities, Salinas and Salinas Valley cities, as well as destinations across California and nationally.

Response 4.9

The commenter states that page 226 of the Draft EIR contains in-text citation of “(SVP, 2010)” which is not included in Section 8.1, References, of the Draft EIR. The commenter also states that 2010 is not the correct date of publication.

The in-text citation refers to the Society of Vertebrate Paleontology’s (SVP) Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. This document was published in 2010. Therefore, revisions to the Draft pertaining to the date of citation are not necessary. However, in response to this comment, page 491 has been revised as follows to add the reference for the SVP document:


Response 4.10

The commenter states that the 2007 Final Supplemental-General Plan Final Program EIR, Housing Element 2015-2023 and associated 2015 MND, and the Economic Development Element should be mentioned in the discussion of the City and County General Plans on page 349 of the Draft EIR. As noted in Response 4.2, reference to these documents has been added to Section 8, References and Preparers.

Response 4.11

The commenter requests that Table 45 of the Draft EIR be revised to include a column showing the population projection as the difference between the 2040 population and the 2015 population.

Table 45, on page 386 of the Draft EIR, shows the forecasted AMBAG population growth between 2015 and 2040 for cities and unincorporated areas of the counties in the AMBAG region. The table includes a column showing 2015 population, a column showing 2020 population, and a column showing 2040 population, as well as a column showing the percent change in population between 2015 and 2040 columns. In response to this comment, Table 45, on page 386 of the Draft EIR, has been revised as follows:
### Table 45 Forecasted AMBAG Population Growth 2015-2040

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Monterey County</td>
<td>432,637</td>
<td>448,211</td>
<td>501,751</td>
<td>69,114</td>
<td>16%</td>
</tr>
<tr>
<td>Carmel-by-the-Sea</td>
<td>3,824</td>
<td>3,833</td>
<td>3,876</td>
<td>52</td>
<td>1%</td>
</tr>
<tr>
<td>Del Rey Oaks</td>
<td>1,655</td>
<td>1,949</td>
<td>2,987</td>
<td>1,332</td>
<td>80%</td>
</tr>
<tr>
<td>Gonzales</td>
<td>8,411</td>
<td>8,827</td>
<td>18,756</td>
<td>10,345</td>
<td>123%</td>
</tr>
<tr>
<td>Greenfield</td>
<td>16,947</td>
<td>18,192</td>
<td>22,327</td>
<td>5,380</td>
<td>32%</td>
</tr>
<tr>
<td>King City</td>
<td>14,008</td>
<td>14,957</td>
<td>16,063</td>
<td>2,055</td>
<td>15%</td>
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<tr>
<td>Marina</td>
<td>20,496</td>
<td>23,470</td>
<td>30,510</td>
<td>10,014</td>
<td>49%</td>
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<tr>
<td>Monterey</td>
<td>28,576</td>
<td>28,726</td>
<td>30,976</td>
<td>2,400</td>
<td>8%</td>
</tr>
<tr>
<td>Pacific Grove</td>
<td>15,251</td>
<td>15,349</td>
<td>16,138</td>
<td>887</td>
<td>6%</td>
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<tr>
<td>Salinas</td>
<td>159,486</td>
<td>166,303</td>
<td>184,599</td>
<td>25,113</td>
<td>16%</td>
</tr>
<tr>
<td>Sand City</td>
<td>376</td>
<td>544</td>
<td>1,494</td>
<td>1,118</td>
<td>297%</td>
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<td>Seaside</td>
<td>34,185</td>
<td>34,301</td>
<td>37,802</td>
<td>3,617</td>
<td>11%</td>
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<tr>
<td>Soledad</td>
<td>24,809</td>
<td>26,399</td>
<td>29,805</td>
<td>4,996</td>
<td>20%</td>
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<tr>
<td>Unincorporated County Territory</td>
<td>104,613</td>
<td>105,361</td>
<td>106,418</td>
<td>1,805</td>
<td>2%</td>
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<tr>
<td>San Benito County</td>
<td>56,445</td>
<td>62,242</td>
<td>74,668</td>
<td>18,223</td>
<td>32%</td>
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<tr>
<td>Hollister</td>
<td>36,291</td>
<td>39,862</td>
<td>46,222</td>
<td>9,331</td>
<td>27%</td>
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<tr>
<td>San Juan Bautista</td>
<td>1,846</td>
<td>2,020</td>
<td>2,251</td>
<td>405</td>
<td>22%</td>
</tr>
<tr>
<td>Unincorporated County Territory</td>
<td>18,308</td>
<td>20,360</td>
<td>26,195</td>
<td>7,887</td>
<td>43%</td>
</tr>
<tr>
<td>Santa Cruz County</td>
<td>273,594</td>
<td>281,147</td>
<td>306,881</td>
<td>33,287</td>
<td>12%</td>
</tr>
<tr>
<td>Capitola</td>
<td>10,087</td>
<td>10,194</td>
<td>10,809</td>
<td>722</td>
<td>7%</td>
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<tr>
<td>Santa Cruz</td>
<td>63,830</td>
<td>68,381</td>
<td>82,266</td>
<td>18,436</td>
<td>29%</td>
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<tr>
<td>Scotts Valley</td>
<td>12,073</td>
<td>12,145</td>
<td>12,418</td>
<td>345</td>
<td>3%</td>
</tr>
<tr>
<td>Watsonville</td>
<td>52,562</td>
<td>53,536</td>
<td>59,743</td>
<td>7,181</td>
<td>14%</td>
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<tr>
<td>Unincorporated County Territory</td>
<td>135,042</td>
<td>136,891</td>
<td>141,645</td>
<td>6,603</td>
<td>5%</td>
</tr>
<tr>
<td>AMBAG Total</td>
<td>762,676</td>
<td>791,600</td>
<td>883,300</td>
<td>120,624</td>
<td>16%</td>
</tr>
</tbody>
</table>

Source: AMBAG's Draft 2018 Regional Growth Forecast.

**Response 4.12**

The commenter requests that a reference to Bernal Drive on page 394 of the Draft EIR be revised to include the word “Drive.” In response to this comment, page 394 of the Draft EIR has been revised as follows:

Highway 183 is a rural two-lane highway connecting Castroville and Salinas. In Castroville, Highway 183 is also known as Merritt Street and begins at an at-grade interchange with Highway 1. The highway is congested between Highway 1 to Davis Road in the City of Salinas, particularly during commute hours on weekdays. It also experiences high rates of agricultural truck traffic movement. In the City of Salinas, the highway becomes two four-lane divided...
arterials on Market and North Main Streets. Highway 183 terminates at the U.S. Highway 101 on-ramp south of Bernal Drive/North Main Street.

Response 4.13

The commenter states that description of public transit service on page 396 of the Draft EIR does not mention the MST service to the Diridon rail station in San Jose. In response to this comment, page 396 of the Draft EIR has been revised as follows:

Monterey-Salinas Transit (MST) provides fixed route transit service in Monterey County. The fixed route service includes 56 routes and consists of a fleet of 123 vehicles, mostly buses (MST, 2017a). MST bus stations are located in the cities of Carmel-by-the-Sea, Del Rey Oaks, Greenfield, Gonzales, King City, Marina, Monterey, Pacific Grove, Salinas, Seaside and Soledad, as well as the community of Chualar. MST also provides public transit service in areas of unincorporated Monterey County, including the communities of Castroville, Pajaro, Prunedale, Moss Landing, Toro Park, Carmel Valley, Carmel Highlands and Big Sur. To assist inter-regional connections, MST also provides service to the Watsonville Transit Center in Santa Cruz County and the Gilroy Caltrain station and Diridon Train Station in the City of San Jose in Santa Clara County. MST had 4.41 million passenger trips on its fixed route system in Fiscal Year 2016 (MST, 2016).

Additionally, this comment is similar to comment 4.8. Please see Response 4.8, which pertains to service to the Diridon Train Station in the City of San Jose.

Response 4.14

The commenter states that Section 4.14, Transportation and Circulation, of the Draft EIR should include a discussion of private transportation services, such as Uber. In response to this comment, page 400 of the Draft EIR has been revised as follows:

**Ridesharing**

Rideshare programs help reduce congestion and improve traffic flow. AMBAG, with grant assistance from the Monterey Bay Air Resources District (MBARD), has successfully implemented a subsidized vanpool program, which reduced vehicles trips associated with agricultural activities and production in the region. Rideshare and carpool programs exist throughout Monterey Bay to facilitate ridesharing. Private rideshare transportation companies, such as Uber and Lyft, are also available transportation options in the AMBAG region.

Response 4.15

The commenter states that the Draft EIR describes the four bikeway classifications used by Caltrans and asks if Class IV bikeways are proposed in the AMBAG region. The commenter asks if new bikeway classifications are created after local bikeway master plans are adopted.

Pages 398 and 399 of the Draft EIR provide a brief summary of the four types of bikeway classifications used by Caltrans, but do not assert that all four types are present or proposed in the AMBAG region. The projects included in the proposed 2040 MTP/SCS include Class I, II and III bikeways, but not Class IV bikeways. Adoption of a local bikeway master plan does not create new Caltrans bikeway classifications.
Response 4.16
The commenter states that the Transportation Demand Management/Transportation System Management section of the Draft EIR does not mention employer shuttles, such as Community Hospital of the Monterey Peninsula (CHOMP). In response to this comment, page 400 of the Draft EIR has been revised as follows:

**Preferential Transit/Carpool Treatment/Electric Vehicle Charging**

Methods employed by local jurisdictions to encourage people to reduce their use of single-occupant vehicles include: preferential parking for carpools and vanpools; subsidized transit passes; use of agency vans for vanpooling; and provision of an on-site transportation coordinator. Regional transit agencies strive to ensure that the major developments within their service areas are transit accessible and that transit stops are located to promote transit use. Some employers in the region, such as the Community Hospital of the Monterey Peninsula, have implemented employee shuttle programs.

Response 4.17
The commenter asks if all public buses in the region are equipped with bicycle racks, and states that if not, the Draft EIR should address this issue.

The Draft EIR evaluates the potential impacts of the proposed 2040 MTP/SCS, including the projects and land use envisioned in the plan. The 2040 MTP/SCS does not include projects involving the installation of bicycle racks on buses. Therefore, an analysis of the possible issues regarding whether public buses in the region are equipped with bicycle racks need not have been discussed in the Draft EIR, and revisions to the Draft EIR are not necessary. Please note that public transit providers do accommodate bicycles on buses. The buses in the Monterey-Salinas Transit (MST) vehicle fleet includes bicycle racks capable of carrying two bicycles, and capacity for two additional bicycles in the interior of the bus, space provided (MST, 2017).\(^4\) The San Benito County Express provides bicycle racks on all of its buses (San Benito County Express, 2015).\(^5\) The Santa Cruz Metropolitan Transit District (METRO) provides bicycle racks with capacity for three bicycles on all of its buses (Santa Cruz METRO, 2018).\(^6\) Additionally, it should be noted that the 2040 MTP/SCS recognizes the importance of bicycle racks in transit use. Page 2-10 of the 2040 MTP/SCS states that “Good intermodal connections, such as convenient park-and-ride locations, on-board bike racks, secure bicycle parking, safe and pleasant access routes and shortcuts can enhance the appeal of both non-motorized and transit modes.”

Response 4.18
The commenter requests clarification of the trip percentages presented in Table 50 of the Draft EIR. The commenter states that it appears “Drive Alone” and “Carpool” are grouped and “Active Transportation” makes up the remaining percentage.

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Table 50, on page 411 of the Draft EIR, does not present the percentage of the combined total of commuters that drive alone, commuters that carpool and commuters that take transit with commute times of 30 minutes or less during peak hour. Therefore, when the percentage of each of these is added, the total percentage does not and should not add to 100 percent. Instead, to evaluate 2040 MTP/SCS impacts, Table 50 presents the percentage of commuter trips that are less than 30 minutes during peak hour by each type of commuter mode under three scenarios. For example, Table 50 indicates that 84.3 percent of commuters that drive alone in 2015 had commute times of 30 minutes or less. This equates to 15.7 percent (100 minus 84.3) that had commutes lengthier than 30 minutes.
January 22, 2018

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments (AMBAG)
445 Reservation Road, Suite G
Marina, CA 93933

RE: Draft 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties and Associated Draft Environmental Impact Report (EIR)

Dear Heather,

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties. Since 2013, LAFCO has provided comments on the different iterations of the 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy. Two main concerns were highlighted at that time: (1) Consideration of cities' adopted Spheres of Influence, and (2) Evaluation of the plan's consistency with relevant sections of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH Act) and LAFCO of Monterey County's adopted Policies and Procedures.

It appears that the Draft EIR for the 2040 Plan addresses LAFCO's original comments, which are attached for reference, and considers the cities' sphere boundaries and CKH Act in its analysis. Therefore, LAFCO staff has no additional comments at this time.

We appreciate the opportunity to provide comments. Please continue to keep us informed throughout your process. I would be happy to meet with you and your staff for more detailed discussions.

Sincerely,

Kate McKenna, AICP
Executive Officer

Attachments: LAFCO 2014 and 2013 Comment Letters
March 28, 2014

Heather Adamson, AICP, Principal Planner
Association of Monterey Bay Area Governments
445 Reservation Road, Suite G
Marina, CA 93933

RE: Draft 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and Associated Draft Environmental Impact Report (EIR)

Dear Ms. Adamson,

Thank you for this opportunity to comment on the Draft 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy and associated Draft Environmental Impact Report.

This letter is a follow-up to LAFCO’s September 4, 2013 letter commenting on AMBAG’s Notice of Preparation of the Draft EIR for the MTP/SCS. That letter anticipated that additional, specific comments would be submitted during the circulation period for the Draft EIR. Two main comments were addressed in the September 2013 letter: (1) Pursuant to SB 375, the MTP/SCS must consider cities’ adopted Spheres of Influence, and therefore the final SCS scenario should only include development that takes place wholly within cities’ adopted Spheres of Influence, and (2) the plan’s EIR should evaluate the plan’s consistency with relevant sections of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, and LAFCO of Monterey County’s adopted Policies and Procedures. A copy of our September 2013 comment letter, including relevant policies and procedures, is attached for reference.

The Commission has reviewed the Draft MTP/SCS and Draft EIR distributed in February 2014. It appears that the draft documents do not address our original comments provided by LAFCO in September 2013. Therefore, we respectfully request AMBAG to revise the draft documents to adequately address our comments as restated below.

Commission Authority

LAFCO of Monterey County is a Responsible Agency under the California Environmental Quality Act (CEQA), with regulatory authority for future local
government boundary and service applications in the study area. It is in this role that the Commission provided comments on the Notice of Preparation last September and is now commenting on the February 2014 drafts of the MTP/SCS and associated EIR. Please refer to the “Commission Authority” section of LAFCO’s September 2013 comment letter for a full description of LAFCO’s role and legislative authority as they relate to AMBAG’s MTP/SCS planning process.

Comment No. 1: The Sustainable Communities Strategy Must Consider Adopted Spheres of Influence

Senate Bill 375, the legislation directing preparation of a Sustainable Communities Strategy, requires that “In preparing a sustainable communities strategy, the metropolitan planning organization shall consider spheres of influence that have been adopted by the local agency formation commission within its region” [Government Code Section 65080(b)(2)(G)].

The February 2014 Draft SCS (page 4-3) states that “In summary, under SB 375, an SCS must: Identify existing and future land use patterns, identify transportation needs and the planned transportation network, consider statutory housing goals and objectives, identify areas to accommodate long-term housing needs, identify areas to accommodate 8-year housing needs, consider resource areas and farmland, and comply with federal law for developing a MTP.”

LAFCO agrees with these listed requirements. However, this list is incomplete as it does not clearly identify cities’ adopted spheres of influence as a factor that has been taken into consideration during development of the SCS scenario. The February 2014 Draft SCS appears to make no mention of spheres of influence anywhere in the document. In addition, the document’s maps and figures (e.g. Figure 4-10: 2035 Land Use Pattern Monterey County) do not show spheres of influence, and give no indication as to whether cities’ adopted spheres of influence were taken into consideration when developing the forecasted amounts and types of development.

LAFCO therefore reiterates its request, as expressed in our September 2013 comment letter, that the 2014 Final SCS “only include scenarios in which future development takes place wholly within the cities’ adopted Spheres of Influence.” The document should clearly demonstrate and explain how cities’ adopted spheres of influence have been factored into the scenario planning process.


LAFCO’s September 2013 comment letter stated: “As discussed in the Project Description Comments above, the EIR should analyze a preferred SCS scenario that relies on adopted Spheres of Influence. In addition, the EIR should evaluate the proposed project, as well as project alternatives in the EIR, for consistency with all relevant sections of the Cortese-Knox-Hertzberg Act and LAFCO Policies and Procedures. Listed below are some of the local LAFCO policies that should be addressed in this consistency analysis.” The letter listed eight key LAFCO policy subject areas.

The February 2014 Draft SCS (Section 2.6, Relationship with Other Plans and Programs, page 2-24) states “The 2035 MTP/SCS and the RTPs prepared by the Monterey, San Benito, and Santa Cruz RTPAs has been evaluated for consistency with the goals, policies and objectives currently being implemented by municipal and county planning agencies within the region as well as the
Local Area Formation Commissions (LAFCO) for Monterey, San Benito, and Santa Cruz County. This discussion is provided in Section 5.0, Land Use Consistency Analysis.

However, Section 5.0 in the Draft EIR provided to LAFCO appears to include no references to LAFCO of Monterey County or to LAFCO's adopted Policies and Procedures. Therefore, LAFCO requests that this section be revised to include a consistency analysis of the Cortese-Knox-Hertzberg Act and LAFCO policies cited in our September 2013 letter.

We appreciate this opportunity to provide comments on the Draft 2014 MTP/SCS and Draft EIR. Please continue to keep us informed throughout AMBAG's processes. LAFCO's Executive Officer, Kate McKenna, would be pleased to meet with AMBAG staff and consultants for more detailed discussions.

Sincerely,

Louis R. Calcagno
Chair

Attachment:
September 4, 2013

Heather Adamson, AICP, Principal Planner
Association of Monterey Bay Area Governments
445 Reservation Road, Suite G
Marina, CA 93933

RE: Notice of Preparation for the 2014 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) Environmental Impact Report (EIR)

Dear Heather,

This letter is a follow-up to my July 24, 2013 letter to you commenting on the subject Notice of Preparation, and contains the official comments of the Local Agency Formation Commission of Monterey County (LAFCO). LAFCO is a CEQA Responsible Agency, with regulatory authority for future local government boundary and service applications in the study area. It is in this role that the Commission is commenting on the Notice of Preparation.

On behalf of the Commission, I would like to first of all thank you for your informative presentation at the August 26th LAFCO meeting. Also at that meeting, the Commission authorized my initial comment letter with certain changes as reflected in this letter. While LAFCO’s comments pertain to the five scenarios outlined in the Notice of Preparation, we understand that AMBAG has subsequently narrowed its intended analysis to two “hybrid” scenarios. AMBAG’s refinement process does not affect the substance of our comments.

COMMISSION AUTHORITY

Pursuant to the California Environmental Quality Act, LAFCO serves as a Responsible Agency with regard to the subject Notice of Preparation. A Responsible Agency is defined as any public agency, other than the lead agency, which has the responsibility for approving the project where more than one public agency is involved. As a Responsible Agency, LAFCO is available to the lead agency (AMBAG) for early consultation on a project to provide guidance on applicable issues and requirements.
LAFCO Comments on the AMBAG 2014 MTP/SCS

LAFCO’s statutory authority to regulate local government boundaries and services is derived from the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code section 56000, et seq.) as amended. Among the purposes of the Local Agency Formation Commission are discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation, growth and development of local agencies based upon local conditions and circumstances (Government Code section 56301).

The Cortese-Knox-Hertzberg Act further provides that “In order to carry out its purposes and responsibilities for planning and shaping the logical and orderly development and coordination of local governmental agencies to advantageously provide for the present and future needs of the county and its communities, the [LAFCO] commission shall develop and determine the sphere of influence of each local governmental agency within the county and enact policies designed to promote the logical and orderly development of areas within the sphere (Government Code section 56425a; emphasis added).

The 2014 Metropolitan Transportation Plan, and its Sustainable Communities Strategy component, may provide a basis for future regional decisions including transportation planning and funding; local land use decisions, patterns and forms enabled by regional transportation plans; and water, sewer and other public service infrastructure that are necessary to support those land uses. Many of these local decisions will involve action by LAFCO.

As such, there are direct links between the current AMBAG planning process and the legislative authority of LAFCO to study and regulate local government boundaries and services. Links between sustainable community strategies and spheres of influence are further emphasized in Senate Bill (SB) 375. The law requires that “In preparing a sustainable communities strategy, the metropolitan planning organization shall consider spheres of influence that have been adopted by the local agency formation commission within its region” [Government Code Section 65080(b)(2)(G)]. SB 375 aims to reduce per-capita vehicle miles traveled and related greenhouse gases through preparation of coordinated land use and transportation plans.

**COMMENTS ON PROJECT DESCRIPTION**

It is our understanding that there is no specific project description, maps or figures to comment on at this time. The Notice of Preparation describes several different planning scenarios relating to land use, transportation and greenhouse gas emission targets. It does not identify any one project as the preferred scenario for analysis in the Environmental Impact Report (EIR). We understand that AMBAG has recently narrowed its analysis to two hybrid scenarios, and will analyze one or both of the hybrid scenarios in the Draft Environmental Impact Report.

LAFCO comments on the Project Description are as follows:

1. Please anticipate that LAFCO will submit additional, specific comments during the circulation period for the Draft EIR.
LAFCO Comments on the AMBAG 2014 MTP/SCS

2. Pursuant to the California Government Code, the SCS preferred planning scenario and all alternative scenarios to be analyzed in the EIR should be designed to reflect only the adopted Spheres of Influence for each city. This methodology would be consistent with the final methodology used in AMBAG's recent Regional Blueprint Planning Process, and supported by LAFCO of Monterey County. This recommendation is also consistent with input provided by LAFCO representatives participating in AMBAG's Planning Directors Group and Regional Advisory Committee for the 2014 MTP/SCS process. We continue to recommend that AMBAG's study of potential SCS scenarios, and final selection of a preferred scenario, only include scenarios in which future development takes place wholly within the cities' adopted Spheres of Influence. The statutory basis for this comment is the requirement of SB 375 that the metropolitan planning organization shall consider Spheres of Influence that have been adopted by the local agency formation commissions within its region [Government Code Section 65080(b)(2)(G)].

COMMENTS ON POTENTIAL ENVIRONMENTAL EFFECTS

As authorized by the Cortese-Knox-Hertzberg Act, LAFCO of Monterey County has adopted local "Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization." In considering applications for local government boundaries or services, LAFCO considers both the State law and the adopted local policies and procedures. The State law and local policies are available on the LAFCO website at http://www.monterey.lafco.ca.gov/. The local policies are attached to this letter for ease of reference.

The Cortese-Knox-Hertzberg Act and LAFCO's Policies and Procedures are germane to the Notice of Preparation. The proposed MTP/SCS project will result in outcomes or recommendations whose implementation would require LAFCO consideration or approvals (such as annexations or Sphere of Influence amendments) in the future. Cities, independent special districts, dependent special districts, the County of Monterey and regional agencies within Monterey County may rely on the EIR analysis for the MTP/SCS as a basis for their own plans and actions. LAFCO will be requested to consider applications for Spheres of Influence, boundaries and services, and to prepare municipal service reviews and other required studies for cities, special districts and the County of Monterey.

As discussed in the Project Description Comments above, the EIR should analyze a preferred SCS scenario that relies on adopted Spheres of Influence. In addition, the EIR should evaluate the proposed project, as well as project alternatives in the EIR, for consistency with all relevant sections of the Cortese-Knox-Hertzberg Act and LAFCO Policies and Procedures. Listed below are some of the local LAFCO policies that should be addressed in this consistency analysis:

1. "LAFCO intends that its Sphere of Influence determinations will serve as a master plan for the future organization of local governments within the County. The spheres shall be used to discourage urban sprawl; limit proliferation of local governmental agencies; encourage efficiency, economy and orderly changes in local government; promote compact, community centered urban development; and minimize adverse impacts on lands classified as prime agriculture." [LAFCO Policies and Procedures, section C.II.1]
We note that all cities, independent special districts and dependent special districts in Monterey County have adopted Spheres of Influence. The spheres are often tied to the capability to provide public services. AMBAG’s long-range planning processes and the current EIR should analyze not only the potential environmental effects of future urban development within the adopted Spheres of Influence of cities, but also the effect of that development on the ability of special districts that provide a wide range of municipal services. If the final 2014 MTP/SCS encourages future urban development outside of the cities’ adopted Spheres of Influence, the resulting “ripple effect” of such development could adversely impact the ability of special districts to efficiently provide public services.

2. “LAFCO shall discourage proposals that would have adverse financial impacts on the provision of governmental services or would create a relatively low revenue base in relationship to the cost of affected services. Applications shall describe related service and financial impacts (including revenues and expenditures) on the County, cities, and/or special districts and provide feasible measures which would mitigate such adverse impacts.” [LAFCO Policies and Procedures, section D.VII.1]

3. “LAFCO discourages proposals which will facilitate development that is not in the public interest due to topography, isolation from existing developments, premature intrusion of urban-type developments into a predominantly agricultural area, or other pertinent economic or social reason.” [LAFCO Policies and Procedures, section D.VII.6]

4. “LAFCO, in furtherance of its objectives of preserving prime agricultural land, containing urban sprawl, and in providing a reasonable assurance of a city/district’s ability to provide services shall consider the appropriateness of phasing annexation proposals which include territory that is not within a city/district’s urban service area and has an expected build-out over a period longer than five to seven years.” [LAFCO Policies and Procedures, section D.VIII.1]

5. “It is the policy of LAFCO to encourage and to seek to provide for planned, well-ordered, efficient urban development pattern while at the same time remaining cognizant of the need to give appropriate consideration to the preservation of open space and agricultural land within such patterns.” [LAFCO Policies and Procedures, section D.IX.1]

6. “For annexations and Sphere of Influence applications, Monterey County LAFCO shall consider as part of its decision whether the city in which the annexation or Sphere of Influence amendment is proposed has included certain goals, policies, and objectives into its General Plan that encourage mixed uses, mixed densities, and development patterns that will result in increased efficiency of land use, and that encourages and provides planned, well-ordered, efficient urban development patterns.” [LAFCO Policies and Procedures, section D.XIII.1]

7. Regarding potential impacts to agricultural lands:

- “A Proposal must discuss how it balances the State interest in the preservation of open space and prime agricultural land against the need for orderly development.” [LAFCO Policies and Procedures, section E.II.1]
LAFCO Comments on the AMBAG 2014 MTP/SCS

- "A Proposal must discuss its effect on maintaining the physical and economic integrity of agricultural lands." [LAFCO Policies and Procedures, section E.II.2]
- "A Proposal must discuss whether it could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space land to uses other than open-space uses." [LAFCO Policies and Procedures, section E.II.3]

8. Regarding jobs and housing:

- "Proposals must demonstrate through both quantitative and qualitative methods the relationship between the Proposal and the surplus or deficiency of local and county-wide housing supply and demand, and employment availability and creation." [LAFCO Policies and Procedures, section F.II]
- "Additionally, the Proposal must demonstrate how its pattern of land use and transportation complements local and regional objectives and goals for the improvement of air quality and reduction of greenhouse gas (GHG) emissions and local vehicle miles traveled (VMT), including the importance of efficient movement of goods and commuter traffic." [LAFCO Policies and Procedures, section F.II; additional Commission comments are noted in italics].

We appreciate this opportunity to provide comments on the Notice of Preparation, and thank you again for the courtesy of your presentation. I would be pleased to meet with AMBAG staff and consultants for more detailed discussions.

Sincerely,

Kate McKenna, AICP
Executive Officer

Attachment: LAFCO Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization, as Adopted by the Local Agency Formation Commission of Monterey County, February 25, 2013
Letter 5

COMMENTER: Kate McKenna, AICP, Executive Officer, Local Agency Formation Commission of Monterey County

DATE: January 22, 2018

Response 5.1

The commenter states that the Draft EIR addresses comments previously submitted on the 2035 MTP/SCS EIR. The commenter provides copies of their prior comment letters. This comment is noted and does not require further response or revisions to the Draft EIR.
February 13, 2018

Association of Monterey Bay Area Governments
P.O. Box 2453
Seaside, CA 93955
Attn: Heather Adamson, Director of Planning

SUBJECT: Comments on the Draft EIR for the 2040 MTP/SCS and RTPs for Monterey, San Benito and Santa Cruz Counties

Dear Ms. Adamson,

Thank you for the opportunity to review and comment on the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy Draft Environmental Impact Report (DEIR). Based on our review of the DEIR, the County of Santa Cruz Planning Department is providing the following comments and suggestions for your consideration.

The population of Santa Cruz County has doubled in the past 30 years and is projected in the proposed AMBAG growth forecast to continue growing through 2040, though at a modest rate. This population growth, in addition to growth in tourism and coastal travel, has exacerbated traffic congestion on Highway 1, which is now heavily congested during morning and evening commute times. Spill over traffic onto local streets contributes to congestion in much of the network. Operational improvements have been made to Highway 1 within the project corridor, but no capacity enhancements. Traffic data compiled for the Tier I project in 2009 estimated the average daily traffic volume on Highway 1 within the project limits to be as high as 104,000 vehicles (both directions combined) (SCCRTC, 2015).

The proposed plan does not improve congestion or reverse the existing trend of increasing congestion.

- Regarding daily vehicle hours of delay, Table 48 on page 410 shows an increase of 53 percent in vehicle delay for Santa Cruz County with project by 2040. We note that Santa Cruz County has greater vehicle hours of delay than Monterey County, with 60 percent less population as per the 2010 census. Page 411, Table 50, indicates that a 30 minute trip in 2015 would take 55 minutes in 2040.

- Regarding Vehicle Miles Travelled (VMT), Table 513, Page 415, shows that the daily VMT for Santa Cruz County would be worse in 2040 with the 2040 MTP/SCS than without it. The same would occur for San Benito County. (The reasoning that an increase in public transit fleets would be the cause does not apply to Santa Cruz County since only operations and maintenance transit improvements are proposed.)

There is additional data documenting worsening conditions throughout the document and, as stated on Page 412, “
The analysis concludes that Transportation impacts T-1 and T-5, regarding transportation congestion and VMT, are significant and unavoidable.

Because many segments along Highway 1 in Santa Cruz County currently operate at LOS E or F during peak hours, trips added to those segments during peak hours would result in a significant impact that cannot currently be mitigated. The impacts that cannot be mitigated include the spillover impacts on local roadways and intersections. Currently, Caltrans has no impact fee in place to help mitigate traffic impacts on Highway 1 in Santa Cruz County. These conditions affect how individual development projects that contribute trips to these failing segments and intersections are analyzed pursuant to CEQA.

The County of Santa Cruz Planning Department therefore suggests that the statement of overriding considerations that must be adopted by AMBAG specify each of the impacted segments of the highway, as well as any other roadways and intersections that are impacted by the congestion. The statement of overriding considerations should include, in addition to Highway 1 segments from Freedom Boulevard to the Highway 17 interchange:

- Highway 1/17 interchange
- Highway 1/Soquel Drive/Soquel Avenue/Commercial Way interchange
- Highway 1/41st Avenue interchange
- Highway 1/Bay Avenue/Porter Street interchange
- Soquel Avenue from southbound ramps at Highway 1 to Gross Road
- Soquel Drive/Porter Street
- Porter Street between Soquel Wharf Road and Dawn lane;
- Soquel Wharf Road
- Park Avenue from Highway 1 to Soquel Drive
- Soquel Drive from Soquel Avenue to Freedom Boulevard
- Rio Del Mar Boulevard at Soquel Drive;
- Highway 9 / Graham Hill Rd.

Thank you for the opportunity to comment. If you have any questions, please contact Paia Levine paia.levine@santacruzcounty.us or Todd Sexauer of my staff at (831) 454-3511 or at todd.sexauer@santacruzcounty.us.

Sincerely,

Kathy Molloy Previsich
Planning Director
Response 6.1

This comment letter was submitted on February 13, 2018, after the close of the public review and comment period for the Draft EIR. Although a response is not required for comments submitted after the closing date (State CEQA Guidelines Section 15088(a)), AMBAG has elected to accept and respond to this comment.

The commenter observes that population and traffic congestion in Santa Cruz County continues to increase. The commenter cites numerous sections of the Draft EIR that point toward increased population growth and unavoidable traffic delays in Santa Cruz County in the future, and correctly notes that the findings for Impacts T-1 and T-5 in the Draft EIR are significant and unavoidable. The commenter suggests that the statement of overriding considerations that must be adopted by AMBAG specify each of the impacted segments of the Highway 1, as well as any other roadways and intersections that are impacted by the congestion.

Additionally, this comment addresses potential impacts to specific segments of Highway 1. As described on page 4 of the Draft EIR, the analysis presents a programmatic assessment of the potential impacts of the proposed 2040 MTP/SCS, focusing on the entire set of activities and programs contained in the proposed 2040 MTP/SCS. Individual transportation project impacts, such as impacts specific to particular segments of Highway 1, are not addressed in detail; rather the focus of the Draft EIR is on the entire program of activities, in the aggregate. This approach to program-level analysis is consistent with State CEQA Guidelines Section 15168’s requirements for Program EIRs. When a Program EIR’s activities are implemented in many locations, site-specific assessments are not required. Center for Biological Diversity v. Department of Fish and Wildlife (2015) 234 Cal.App. 4th 214, 237. Please also see Response 7.2 regarding the level of detail included in the Draft EIR.

Further, it would not be appropriate to include significant and unavoidable impacts in the statement of overriding considerations that were not included in the EIR and its CEQA findings of fact. A statement of overriding considerations is required before a lead agency approves a project which will result in those significant unavoidable environmental impacts “which are identified in the Final EIR.” State CEQA Guidelines Section 15093. Thus the statement of overriding considerations for the 2040 MTP/SCS would properly override significant unavoidable Impacts T-1 and T-5 identified in the EIR, but not segment-specific impacts on Highway 1 since these are not identified in the EIR.
9.5 miles along Highway 101 near Salinas; adding auxiliary lanes to Highway 1 in Santa Cruz County.
HOWEVER, THE 2040 MTP/SCS WOULD CONFLICT WITH THE STATE’S ABILITY TO ACHIEVE THE AB 32, SB 32 AND EO-5 S-3-05 GHG REDUCTION GOALS. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.
Response 7.2

The commenter states that the Draft EIR should analyze the impact of road expansion projects on GHG emissions. The commenter recommends that impacts of the Highway 1 auxiliary lane project should either be evaluated by the AMBAG EIR or removed from the MTP/SCS pending an environmental review of the project. The commenter states that studies show that increases in VMT result from increases in roadway capacity, and these increases may be considerable. The commenter asserts that the Draft EIR does not evaluate roadway widening projects for GHG emissions.

This comment pertains to the potential impacts of specific projects included in the 2040 MTP/SCS project lists. As described on page 4 of the Draft EIR, the analysis presents a programmatic assessment of the potential impacts of the proposed 2040 MTP/SCS, focusing on the entire set of projects and programs contained in the proposed 2040 MTP/SCS. Individual transportation project impacts are not addressed in detail; rather the focus of the Draft EIR is on the entire program of projects, in the aggregate.

Section 15168 of the \textit{State CEQA Guidelines} defines a program EIR as an EIR that addresses “a series of actions that can be characterized as one large project and are related either:

1. Geographically;
2. As logical parts in the chain on contemplated actions;
3. In connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or
4. As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways.”

Here, the proposed 2040 MTP/SCS is a long-term, regional-scale plan covering the entire area of Monterey, San Benito and Santa Cruz counties through 2040. Accordingly, the Draft EIR analyzes the proposed 2040 MTP/SCS at a programmatic level, as described on page 4 of the Draft EIR.

Program EIRs, such as the Draft EIR, are an example of the process of “tiering.” Section 15385 of the \textit{State CEQA Guidelines} defines tiering as “coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared...” In addressing the appropriate amount of detail required at different stages in the tiering process, the \textit{State CEQA Guidelines} state that “[w]here a lead agency is...
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using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof..., the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographic scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand” (State CEQA Guidelines Section 15152(c).

As explained by the Supreme Court, “[t]iering is properly used to defer analysis of environmental impacts and mitigation measures to later phases when the impacts or mitigation measures are not determined by the first-tier approval decision but are specific to the later phases.” In re Bay-Delta (2008) 43 Cal.4th 1143, 1169-1170. “Under CEQA's tiering principles, it is proper for a lead agency to use its discretion to focus a first-tier EIR on only the general plan or program, leaving project-level details to subsequent EIR’s when specific projects are being considered.” Id., at 1174-1175.

Consistent with these provisions of CEQA, the Draft EIR does not evaluate project-specific impacts of individual project components. Under State CEQA Guidelines Section 15168, implementing agencies are required to determine whether project-specific impacts require additional analysis in subsequent second-tier CEQA documents, as described on page 37 of the Draft EIR. Therefore, the project-level impacts, including GHG emissions and VMT impacts, of capacity-expanding projects, such as projects that would add auxiliary lanes to Highway 1 and lanes to Highway 101, would be evaluated in a future project-level environmental review. The inclusion of projects in the 2040 MTP/SCS does not necessarily mean that the projects would be approved and implemented. Approval of a particular project, such as a project adding auxiliary lanes to Highway 1, will depend on the project-level analysis, findings and if applicable, statement of overriding considerations. Therefore, revisions to the Draft EIR are not necessary, and AMBAG need not remove the Highway 1 auxiliary lanes project from the 2040 MTP/SCS pending a project-specific environmental review as requested by the commenter.

Please also see Response 7.3 regarding how the Draft EIR adequately addresses the issue of induced travel and resulting VMT and GHG impacts, from roadway expansion projects in general.

Response 7.3

The commenter states that because the AMBAG Regional Transportation Demand Model (RTDM) does not account for induced travel, the VMT estimates presented in the Draft EIR are likely underestimated and findings for Impact GHG-2 are unreliable.

As stated on page 409 of the Draft EIR, AMBAG acknowledges that the 2040 MTP/SCS projects that would expand highway capacity, such as adding additional travel lanes to Highway 101 near Salinas, may induce travel. As described on page 410 of the Draft EIR, although the AMBAG RTDM does not specifically quantify induced travel, at the regional level the effects of induced travel may be negligible compared to the overall amount of travel. This statement is supported by the Federal Highway Administration’s “HERS-ST Highway Economic Requirements System - State Version: Technical Report - Appendix B: Induced Traffic and Induced Demand,” as cited on page 410 of the Draft EIR. The technical report states that if the demand is for a single facility, then induced traffic will appear large relative to previous volumes, because most of the change in trips will be from diverted trips. At the regional level, induced travel would be a smaller share of total traffic growth, because only trips diverted from other regions, plus substitutions between transportation and other goods, make up the induced share.” In other words, at the regional level, induced travel is a smaller percentage of traffic growth because the vehicles constituting the induced travel on a particular facility in the region may constitute trips that have been diverted from other roadways in the
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region, and therefore would not be “new” induced VMT. Because induced VMT would likely be minimal on a regional level, the GHG emissions associated with any induced VMT would also be minimal. Therefore, the Draft EIR’s quantitative estimates of VMT impacts (Impacts T-1 and T-5) and GHG emissions impacts (Impacts GHG-2 and GHG-3) are reasonably accurate, and there would be no need to re-examine the Draft EIR’s significance conclusions for these impacts. Please refer to Appendix F of the 2040 MTP/SCS for technical documentation pertaining to RTDM.

Response 7.4

The commenter asserts that statements in the Draft EIR suggest that RTDM does not include six parameters listed in a study by Milam, Birnbaum, Ganson, Handy and Walters (2017) that were developed for evaluating a model’s ability to account for induced travel. The commenter asks if the AMBAG RTDM accounts for parameter 1 on the list pertaining to newly generated trips.

The AMBAG RTDM does account for parameter 1 listed in the Milam et al. study (2017) in the trip generation module, which was estimated directly from the California Households Travel Survey (CHTS) to a high level of confidence.

Response 7.5

The commenter asks if the AMBAG RTDM accounts for parameter 2 on the list developed by Milam et al. (2017), which pertains trip length influences on trip distribution.

The AMBAG RTDM does account for parameter 2 listed in the Milam et al. study (2017). To account for the vehicle trip length parameter, the AMBAG RTDM utilizes a feedback mechanism that considers peak and off-peak travel times in the trip distribution stage. These parameters are calibrated based on the observed trip lengths from the CHTS in the case of the AMBAG RTDM.

Response 7.6

The commenter asks if the AMBAG RTDM accounts for parameter 3 on the list developed by Milam et al. (2017), which pertains to the influences of travel time on modal split.

The AMBAG RTDM mode choice model is sensitive to travel time by mode and by time of day. It is also sensitive to other travel costs, such as fare and transit accessibility and urban/rural form considerations. Therefore, the AMBAG RTDM does account for parameter 3 on the list developed by Milam et al. (2017).

Response 7.7

The commenter asks if the AMBAG RTDM accounts for parameter 4 on the list developed by Milam et al. (2017), which pertains to the influences of travel time on route choices.

The AMBAG RTDM utilizes a multi-class assignment based on the User Equilibrium premise to model trip assignment. From a route choice perspective, this method is sensitive to roadway geometrics, travel time and other calibration parameters. The origin-destination matrix that is assigned is sensitive to changes in travel time through the feedback mechanism. Therefore, the AMBAG RTDM does account for parameter 4 on the list developed by Milam et al. (2017).

7 Milam, R.T., M. Birnbaum, C. Ganson, S. Handy, & J. Waters. Closing the Induced Vehicle Travel Gap Between Research and Practice. Transportation Research Record: Journal of the Transportation Board, No. 2653, 2017, pp. 10-16.

Response 7.8

The commenter asks if the AMBAG RTDM accounts for parameter 5 on the list developed by Milam et al. (2017), which pertains to the influences of travel time on travel departure timing.

The AMBAG RTDM is sensitive to changes in the land use development patterns and is being tested in model sensitivity testing, as conducted by AMBAG’s consultant, Fehr & Peers. Therefore, the AMBAG RTDM does account for parameter 5 on the list developed by Milam et al. (2017).

Response 7.9

The commenter asks if the AMBAG RTDM accounts for parameter 6 on the list developed by Milam et al. (2017), which pertains to the influences of travel time and accessibility on long-term land use patterns.

AMBAG implemented an employment-driven forecast model for the first time in the 2014 forecast and contracted with the Population Reference Bureau (PRB) to test and apply the model again for the 2018 Regional Growth Forecast (RGF). To ensure the reliability of the population projections, PRB compared the employment driven model results with results from a cohort-component forecast, a growth trend forecast and the most recent forecast published by the California Department of Finance (DOF). All four models resulted in similar population growth trends. As a result of these reliability tests, AMBAG and PRB chose to implement the employment-driven model again for the 2018 RGF. The regional forecast figures – for population, jobs and housing - were accepted by the AMBAG Board of Directors at an April 13, 2016, meeting and authorized staff to use for the development of the 2040 MTP/SCS. For further details on Monterey Bay Area RGF methodology please refer to the Appendix A of the 2040 MTP/SCS. AMBAG’s RGF process also includes local jurisdictions’ plans and additional inputs received from all local jurisdictions (i.e., Planning Directors). AMBAG held over 100 meetings with local officials to receive their inputs on the regional growth forecast. Therefore, the AMBAG RTDM does account for parameter 6 on the list developed by Milam et al. (2017).

Response 7.10

The commenter asserts that statements in the Draft EIR suggesting that induced travel effects in the entire AMBAG region are minimal is not supported by factual evidence. The commenter cites studies by Duranton and Turner (2011) and Milam et al. (2017) as support for this assertion. The commenter also states that highway expansions could have a significant impact on decisions resulting in trips diverted from other regions, and provides an example scenario involving route selection for a commuter trip from the San Francisco Bay to Monterey. Additionally, the commenter states that the Regional Traffic Demand Model does not take into account the impact of road expansion projects on population and employment, as instructed in the Milan et al. study (2017).

The study by Duranton and Turner (2011) focused research on the effects of increased road capacity on induced travel in metropolitan areas and cities, specifically U.S. Census Bureau Metropolitan Statistical Areas. The Duranton and Turner research was not conducted at the county level or Metropolitan Planning Organization (MPO) level, such as the AMBAG region. Milam et al. (2017, p. 16) specifically notes that additional research is needed to evaluate the Duranton and Turner study at the MPO or county level. According to Milam et al. (2017, p. 16), “at a minimum, induced vehicle

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Travel effects should be acknowledged and discussed for capacity expansion projects that will reduce travel times. Acknowledgment should disclose any limitations related to the forecasting that may have not been sensitive to induced vehicle travel effects and how those effects could influence the analysis results. This effort could include a qualitative discussion or even simple elasticity-based estimates of VMT levels derived from the project’s lane-mile changes. This recommendation applies to regional and project scale analysis.” The Draft EIR does provide such a qualitative discussion.

State CEQA Guidelines

Section 15151 allows for disagreement among experts when assessing environmental impacts of a proposed project and recommends that the EIR summarize the main points of disagreement; the preceding responses provide this summary regarding the appropriate approach for the Draft EIR’s consideration of induced travel. CEQA case law gives lead agencies considerable discretion in the choice among differing expert opinions and studies, such as the induced demand studies relied upon in the 2040 MTP/SCS Draft EIR. Generally see CEB, Practice under the California Environmental Quality Act (2d. Ed.), Section 1.35. A lead agency may accept the environmental conclusions reached by the experts that prepared the EIR even though others may disagree with the underlying data, analysis or conclusions (see Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal. (1988) 47 Cal.3d 376, 408). Discrepancies in results arising from different methods for assessing environmental issues do not undermine the validity of the EIR analysis as long as a reasonable explanation supporting the EIR analysis is provided (see Planning & Conserv. League v. Castaic Lake Water Agency (2009) 180 Cal.App.4th 210, 243). The existence of differing opinions arising from the same pool of information is not a basis for finding the EIR to be inadequate; when approving an EIR, an agency need not correctly resolve a dispute among experts about the accuracy of the EIR’s environmental forecasts (see Eureka Citizens for Responsible Gov’t v. City of Eureka (2007) 147 Cal.App.4th 357 and California Oak Found. v. City of Santa Clarita (2005) 133 Cal.App.4th 1219, 1243.

Although the Draft EIR and AMBAG’s RTDM do not specifically use approaches provided in the Duranton and Turner study (2011) or Milam et al. study (2017), the Draft EIR generally adheres to the minimum recommendations of the Milam et al. study describe above. As described on page 409 of the Draft EIR acknowledges that the 2040 MTP/SCS contains projects that may induce travel. Page 410 of the Draft EIR discloses limitations to the modeling and forecasting that are not sensitive to induced vehicle travel. Finally, page 410 of the Draft EIR also provides a qualitative discussion of how, at a regional level, induced VMT would likely be minimal, based on documentation published by the Federal Highway Administration (see Response 7.3).

The example scenario provided in the comment envisions drivers travelling between the San Francisco Bay Area and Monterey deciding whether to travel on Highway 17 or Highway 101, based on levels of traffic congestion reported on traffic applications for cellular phones (i.e., phone apps). Both Highway 17 and Highway 101 occur within the AMBAG region, and travel on either one would generate VMT in the region. Therefore, if a driver were to choose to travel on Highway 17 instead of Highway 101, based on traffic congestion reported on phone apps, the VMT generated by such travel would be diverted from one roadway to the other, and would not be entirely new VMT. While one highway may be shorter route to Monterey than the other, and require fewer miles of travel, the difference would be minimal on the regional level because the majority of the VMT generated by the trip would occur regardless of the route selection. This is consistent with Federal Highway Administration documentation mentioned above, which states that at the regional level, induced travel is a smaller percentage of traffic growth because the vehicles constituting the induced travel on a particular facility in the region may constitute trips that have been diverted from other roadways in the region, and therefore would not be “new” induced VMT (see Response 7.3).

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The Milam et al. study (2017) does not definitively conclude that regional population and employment growth forecasts should not be fixed. Instead, the Milam et al. study (2017, p. 14) states that the findings of the Duranton and Turner study (2011) suggest that population and employment growth forecasts used in regional transportation plans should not be fixed. As stated above, the study by Duranton and Turner (2011) focused research at the level of U.S. Census Bureau Metropolitan Statistical Areas, as opposed to the MPO level, such as the AMBAG region. Therefore, the findings of the Duranton and Turner study (2011) or the recommendations of the Milam et al. based on the findings of Duranton and Turner need not be relied upon as controlling for the 2040 MTP/SCS and its EIR, which are for the entire AMBAG region. See Response 7.9 for substantial evidence supporting the accuracy of the 2040 MTP/SCS Regional Growth Forecast.

Response 7.11

The commenter cites an excerpt of Impact GHG-4 of the Draft EIR stating that the 2040 MTP/SCS would conflict with the State’s ability to achieve the AB 32, SB 32 and EO-S-3-05 GHG reduction goals. The commenter states that alternatives to the 2040 MTP/SCS that would conform to these State goals should be considered. The commenter suggests an alternative that would eliminate highway widening projects in Santa Cruz County and Monterey County.

The comment asserts that alternatives to the MTP/SCS need to be designed to bring the MTP/SCS “into conformity with state law.” By preparing an MTP/SCS that meets SB 375 passenger vehicle GHG reduction targets, AMBAG is complying with its applicable legal requirements to help reduce GHG emissions. There is no legal requirement that the AMBAG region’s MTP/SCS achieve GHG emission reductions proportional to State reductions called for by AB 32, SB 32 and EO-S-3-05. CARB’s 2017 Scoping Plan presents the State’s strategy to achieve these State GHG reduction goals, and does not call for proportional reductions in each region.

Nevertheless, it is not possible for AMBAG to develop a feasible alternative to the proposed 2040 MTP/SCS that would achieve theoretical regional reductions in total GHG emission proportional to the State GHG reductions goals of AB 32, SB 32 and EO-S-3-05. As shown in Table 32 on page 282 of the Draft EIR, about 55% of the MTP/SCS GHG emissions in the AMBAG region in 2040 would be from land use. As discussed in Section 1.2.2(a) and on page 281 of the Draft EIR, land use emissions were estimated based on extrapolation of the emissions inventories from the cities and counties with climate action plans (CAPs). AMBAG’s SCS must be based on these latest planning assumptions. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS (Government Code §65080(b)(2)(K)). Local governments are the main agencies responsible for mitigation of the impacts of land use plans and projects that implement the SCS, and AMBAG has no concurrent authority to mitigate the impacts of land use plans and projects, including GHG emissions impacts, as described on page 81 of the Draft EIR.

The remaining 45% of the MTP/SCS 2040 GHG emissions shown in Table 32 are attributable to on-road motor vehicles. The MTP/SCS includes feasible land use and transportation strategies intended to reduce mobile source GHG emissions, and the EIR includes Mitigation Measure T-5, which presents project-level mitigation measures to further reduce VMT and associated mobile source GHG emissions. However, as recognized on page 416 of the Draft EIR, implementation of project-level VMT-reducing measures—such as mixed uses and TOD—may not be feasible and cannot be guaranteed on a project-by-project basis. Additionally, it is unlikely that an increase in daily VMT
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above existing conditions could be fully avoided in 2040 by EIR mitigation measures or alternatives, due to factors unrelated to discretionary approvals, such as population growth in the region.

Implementation of an MTP/SCS alternative that substantially reduces mobile source GHG emissions is considered infeasible because such an alternative would likely require major changes in land use policies, parking policies, transit funding, road pricing and vehicle fuels and technology that are beyond AMBAG’s ability to implement. For example, CARB’s 2017 Scoping Plan (page 76) recognizes that most of the GHG reductions for the transportation sector needed to achieve State GHG reduction goals will come from State actions related to vehicle technologies and low carbon fuels, and that even for VMT reduction alone, there is a gap between what SB 375 can provide and what is needed to meet the State’s 2030 and 2050 GHG reduction goals.

The commenter’s suggested alternative to eliminate road widening projects from the 2040 MTP/SCS would not achieve consistency with the GHG reduction goals of AB 32, SB 32 and EO-S-3-05. Page 409 of the Draft EIR acknowledges that projects that would expand highway capacity, such as adding additional travel lanes, may induce travel. Induced travel would generate GHG emissions. However, as described above in Response 7.3, the induced travel and associated GHG emissions from road widening projects would be minimal on a regional level. As described above, the GHG emissions in 2040 are a combination of land use emissions (55%) and on-road emissions (45%). Because this suggested alternative would not reduce land use emissions, and only minimally reduce on-road emissions, significant impacts related to conflicts with the State’s ability to achieve GHG reductions goals of AB 32, SB 32 and EO-S-3-05 would not be avoided.

Pursuant to Section 15126.6 of the State CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Because the suggested alternative would not eliminate any significant effects of the 2040 MTP/SCS, because the Draft EIR provides a reasonable range of alternatives, the suggested alternative need not be added to the Draft EIR.

In addition, the suggested alternative need not be added to the Draft EIR because it presents an alternative to individual components of the MTP/SCS, rather than to the proposed MTP/SCS as a whole. An EIR is not required to consider alternatives to individual project components, but instead should consider alternatives to the project as a whole. See California Oak Foundation v. Regents of University of California (2010) 188 Cal.App.4th 227, 276-277.

Response 7.12

The commenter summarizes GHG reduction estimates presented in Table 32 of the Draft EIR and notes very little difference between the 2040 MTP/SCS and the no project alternative. The commenter states that this means the 2040 MTP/SCS has a negligible contribution toward reducing GHG emissions.

No revisions to the Draft EIR are required because this comment pertains to the effectiveness of the 2040 MTP/SCS rather than the adequacy of the EIR analysis. It should be noted, however, that the 2040 MTP/SCS includes alternative transportation projects and land use patterns that would reduce GHG emissions, as well as transportation projects that would reduce congestion and on-road emissions compared to conditions in 2040 without the 2040 MTP/SCS. The Draft EIR also includes mitigation measures, that when implemented, would further reduce the GHG emissions shown in Table 32 for the 2040 MTP/SCS. For example, mitigation measure GHG-4 on page 285 of the Draft EIR states that cities and counties should implement energy-reducing measures for new residential
Response 7.13

The commenter states that findings in the Draft EIR that the 2040 MTP/SCS would achieve per capita GHG reduction targets must not rely on State programs that improve vehicle emission standards, changes in fuel composition and other State measures that reduce GHG emissions. The commenter requests additional clarification on how the per capita GHG emissions targets of SB 375 would be achieved.

As described in Impact GHG-3 on pages 282 and 283 of the Draft EIR, implementation of the 2040 MTP/SCS would be consistent with the AMBAG’s SB 375 GHG reduction targets of zero percent in 2020 and five percent in 2035. These projections do not account for any additional measures from the current SB 32 Scoping Plan to further reduce passenger vehicle GHG emissions and are, therefore, conservative.

The per capita GHG reductions presented on page 282 and 283 of the Draft EIR do not rely on State programs that improve vehicle emission standards, changes in fuel composition and other State measures that reduce GHG emissions. As described on pages 278 and 279 of the Draft EIR, to determine whether the 2040 MTP/SCS would allow AMBAG to meet its SB 375 reduction targets, per capita CO₂ emissions were calculated by multiplying the emission factors by the VMT from passenger vehicles, and dividing by the region’s population. For the analysis, emission factors were generated using the SB 375 template in EMFAC, which deactivates Advanced Clean Cars (Pavley) and Low Carbon Fuel Standards. In addition, the following three off-model adjustments were made to adjust the VMT from passenger vehicles based on the projects included in the 2040 MTP/SCS:

- Removal of through travel and half of Internal-External and External-Internal travel.
- Adjustments for “off-model” projects and programs included in AMBAG’s 2040 MTP/SCS (i.e., Transportation Demand Management [TDM] and Transportation System Management [TSM] Strategies, increase in work at home employees, additional efforts for zero emission vehicle (ZEV) infrastructure and active transportation).
- Accounting for transit service enhancements.

The above off-model techniques were based on academic literature reviews, collaboration with other MPOs and consultation with CARB’s transportation and land-use related policies (CARB, 2017). Off-model adjustments were computed for 2020 and 2035 since these factors cannot be modelled and have significant effects on VMT reduction, which is used to assess whether the 2040 MTP/SCS would allow the region to meet AMBAG’s SB 375 reduction targets.

Additionally, please refer to the “Methodology to Estimate Performance Measures” section in Appendix G to the 2040 MTP/SCS, which describes the methodology used to calculate the regional performance measures. In summary, the per capita GHG emissions presented in the Draft EIR did not factor in State programs that improve vehicle emission standards, changes in fuel composition, or other State measures that reduce GHG emissions.

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Response 7.14

The commenter states that the Draft EIR should provide more mitigation measures to reduce GHG impacts, and that mitigation measure GHG-4 is flawed because it requires measures already included as part of the climate action plans of several jurisdictions in the AMBAG region. The commenter suggests that additional mitigation measures could include extending mitigation measure T-5 to apply to transportation projects, in addition to land use projects. The commenter also suggests that additional mitigation measures could include requiring all transportation measures to decrease VMT.

Mitigation measure GHG-4, on page 285 of the Draft EIR, includes measures for reducing emissions related to energy and water consumption. Although some of these measures may be included in the existing climate action plans of some jurisdictions in the region, as the commenter states, they are not included in all climate action plans within the region. Additionally, some jurisdictions within the region have not yet adopted climate action plans. Therefore, mitigation measure GHG-4 is not redundant or flawed, and is an effective approach for reducing GHG emissions, particularly in jurisdictions without an adopted climate action plan.

Mitigation measure T-5, on pages 415 and 416 of the Draft EIR, states that implementing agencies should evaluate VMT as part of project-specific CEQA review and discretionary approval decisions for land use projects. Where project-level significant impacts are identified, implementing agencies should identify and implement measures that reduce VMT. In response to this comment, pages 415 and 416 of the Draft EIR have been revised as follows:

Mitigation Measures

For transportation projects under their jurisdiction, TAMC, SBtCOG and SCCRTC shall implement and transportation project sponsor agencies can and should implement, the following mitigation measures developed for the 2040 MTP/SCS program where applicable for transportation projects that would increase the capacity of a roadway. For land use projects under their jurisdiction, the cities and counties in the AMBAG region can and should implement the following mitigation measure. Project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.

T-5 Project-Level VMT Analysis and Reduction

Transportation project sponsor agencies shall evaluate transportation projects that involve increasing roadway capacity for their potential to increase VMT. Where project-level increases are found to be potentially significant, implementing agencies shall identify and implement measures that reduce VMT. Examples of measures that reduce the VMT associated with increases in roadway capacity include tolling new lanes to encourage carpools and fund transit improvements; converting existing general purpose lanes to high occupancy vehicle lanes; and implementing or funding off-site travel demand management.

Implementing agencies shall evaluate VMT as part of project-specific CEQA review and discretionary approval decisions for land use projects. Where project-level significant impacts are identified, implementing agencies shall identify and implement measures that reduce VMT. Examples of measures that reduce VMT include infill development, mixed use and transit oriented development, complete street programs, reduced parking requirements, and providing alternative transportation facilities, such as bike lanes and transit stops.
Implementing Agencies
Implementing agencies for transportation projects include RTPAs and transportation project sponsor agencies. Implementing agencies for land use projects include cities and counties.

Response 7.15
The commenter states that the analysis in the Draft EIR should account for vehicle travel through the region.

The California Air Resources Board relies on a variety of specific information sources to help inform the sensitivity analysis of the evaluation of an MPO’s traffic model. The information from these sources can be compared to the results of MPO’s sensitivity analyses to determine if the modeled results fall within a range of expected outcomes. Among these sources is the Recommendations of the Regional Targets Advisory Committee (RTAC) Pursuant to Senate Bill 375, September 2009 (Regional Targets Advisory Committee, 2009). The final RTAC report, which the California Air Resources Board relies on to inform the sensitivity of traffic modelling, states that an MPO should not be responsible for through trips because the MPO’s ability to affect emissions from these trips is unclear. The final RTAC report states that an MPO should take responsibility for half of the trip that has either an origin in one MPO region and a destination within another MPO region, because either region has an equal opportunity to affect the emissions from trips that regularly cross over their shared boundary. Therefore, consistent with the California Air Resources Board guidance for traffic model sensitivity, AMBAG’s Regional Travel Demand Model removes through trips and half of Internal-External and External-Internal trips. Because the Draft EIR utilizes modeling from the Regional Travel Demand Model for its analysis, and the Regional Travel Demand Model is consistent with California Air Resources Board guidance, revisions to the Draft EIR are not necessary.

Response 7.16
The commenter states that there needs to be an environmental review of the traffic safety and circulation improvements of adding auxiliary lanes to Highway 1 between the City of Santa Cruz and community of Aptos. The commenter cites a 2015 EIR for Highway 1 projects that found slight to no safety and circulation benefits from an alternative that included auxiliary lanes on Highway 1. The commenter also states that the 2040 MTP/SCS Draft EIR should report the findings of the 2015 EIR and propose alternatives to the auxiliary lanes project.

This comment pertains to the potential impacts of specific projects included in the 2040 MTP/SCS project list. This comment is similar to comment 7.2. Please see Response 7.2, above. As described therein, the analysis in the Draft EIR presents a programmatic assessment of the potential impacts of the proposed 2040 MTP/SCS, focusing on the entire set of projects and programs contained in the proposed 2040 MTP/SCS. Individual transportation project impacts are not addressed in detail; rather, as a Program EIR, the focus of the Draft EIR is on the entire program of projects, in the aggregate. Project-level impacts, including projects that would add auxiliary lanes to Highway 1, would be evaluated in a future project-level environmental review.

Related to Response 7.2, the inclusion of projects in the 2040 MTP/SCS does not necessarily mean that the projects would be approved or implemented. Approval of a particular project, such as a project adding auxiliary lanes to Highway 1, will depend on the project-level analysis, findings and if

Response 7.17

The commenter states that the Santa Cruz Regional Transportation Plan should prioritize active transportation investments in order to address a history of social inequality in transportation that manifests in a high rate of injuries. The comment does not provide evidence to support the assertion that there is a history of social inequality in transportation manifesting in high injury rates in Santa Cruz County. Nonetheless, the 2040 Santa Cruz Regional Transportation Plan includes active transportation projects as well as safety improvements. For example, the Highway 1/Harks Slough Road Interchange: Bicycle/Pedestrian Bridge project (RTP ID: WAT 01A) calls for construction of a new bridge over Highway 1 for pedestrians and cyclists, thereby eliminating potential safety hazards of a surface-level crossing of Highway 1. Another example is the Beach/Cliff Intersection Signalization project (RTP ID: SC-P93), which would improve pedestrian safety by installing a traffic signal. Yet another example is the Civic Center Drive Bike Lanes project (RTP ID: SV-P33) that would add bike lanes to narrow road in the City of Scotts Valley, thereby increasing the safety of cyclists using this route.
February 5, 2018

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Re: 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans

Comments on the Draft Environmental Impact Report for the MTP/SCS

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<td>“AMBAG’s regional efforts to assist local jurisdictions in aligning local land use policies with the proposed 2040 MTP/SCS….Examples include, but are not limited to…funding transit, bicycle and pedestrian infrastructure that supports the increased use of alternative modes…”</td>
<td>Why doesn’t AMBAG promote bicycle parking facilities, bicycle safety education, and support low cost helmet programs? Marin County found that nearly 30% of their morning peak hour traffic was caused by parents driving kids to school because they didn’t believe there were safe routes for their children to ride bikes.</td>
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## Comments on the MTP/SCS

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</tr>
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</table>

Sincerely,

Jennifer N. M. Coile
Jennifer N. M. Coile, AICP 1982-2012
Response 8.1

The commenter states that the Draft EIR does not include a figure showing the location of the San Benito River Recreational Trail project. In response to this comment, Figure 5, MTP Projects in San Benito County, on page 67 of the Draft EIR has been revised to show the approximate location of phase 1 of the San Benito River Recreational Trail project. Other phases of the project are not included in the 2040 MTP/SCS.

Response 8.2

The commenter asks why the Draft EIR does not include Americans with Disabilities Act projects for San Benito County.

This comment pertains to the types of projects included in the 2040 MTP/SCS, specifically the projects in San Benito County. The projects included in the MTP/SCS are submitted by local jurisdictions and transit operators through the regional transportation planning agencies. The projects for San Benito County may include components for Americans with Disabilities Act (ADA) improvements, but ADA improvements are not evaluated individually. Therefore, the Draft EIR does not analyze ADA projects in San Benito County, but rather projects that may include ADA components.

Response 8.3

The commenter states that the description of existing San Benito County bikeways on page 399 of the Draft EIR does not mention a Class I bikeway near Tres Pinos School and inaccurately describes a Class II bikeway in San Juan Bautista. In response to this comment, page 399 of the Draft EIR has been revised as follows:

**San Benito County**

San Benito County has approximately 193 miles of bikeways (AMBAG, 2014c). Bicycle facilities in San Benito County are generally concentrated in and around Hollister. A Class I bikeway is located approximately parallel with State Highway 25 from near the southern limits of Hollister to near the center of the city, north of Rancho San Justo Park. Class II bikeways are provided on several streets in Hollister, including State Highway 25 Bypass, Westside Boulevard, Southside Road and Union Road. A Class I bikeway extends between Tres Pinos School and the community of Tres Pinos, south of the City of Hollister. Within the City of San Juan Bautista, a short section of San Juan Highway is in the northern part of town has designated bike lanes. Additionally, Class II bike lanes extend north of San Juan Bautista to Anzar High School on either side of San Juan Highway. The Juan Bautista de Anza National Historic Trail traverses San Juan Bautista and the western part of the county.
Appendix F: Response to Comments

Response 8.4
The commenter asks why AMBAG does not promote bicycle parking facilities, bicycle safety education and low-cost helmet programs. The commenter describes a study from Marin County that found nearly 30 percent of morning peak hour traffic was due to parents driving kids to school because there were assumed to be no safe bike routes to school.

This comment pertains to AMBAG programs, and not to the analysis or findings of the Draft EIR. Therefore, revisions to the Draft EIR are not necessary. Although the 2040 MTP/SCS does not include low-cost helmet projects, it does include projects that promote safe routes to school and bicycle parking facilities (i.e., bicycle lockers). For example, the Safe Routes to Schools Implementation Program project in San Benito County (AMBAG ID: SB-COG-A57) would improve infrastructure to achieve safer walking and bicycling routes to R.O. Hardin and Calaveras Elementary Schools. The Ecology Action Countywide SRTS Youth Pedestrian and Bicycle Safety Education project in Santa Cruz County (AMBAG ID: SC-EA-02-USC) would implement pedestrian and bicycle safety education at local schools. The Capitola Village Multimodal Enhancements – Phase 2/3 project in Santa Cruz County (AMBAG ID: SC-CAP-P04b-CAP) would involve constructing bicycle improvements along four streets, including the installation of bicycle lockers. The Bike Parking Subsidy Program project in Santa Cruz County (AMBAG ID: SC-RTC-16-RTC) would provide subsidies to schools, government agencies and non-profit organizations to install bicycle racks and bicycle lockers.

Response 8.5
The commenter expresses an opinion that land use patterns in San Benito County are unlikely to substantially change by 2040, and the most effective way to reduce VMT among San Benito County residents would be to promote carpooling/ridesharing for work commutes, with guaranteed ride-home vouchers and possibly using Uber-type services instead of taxis.

This comment does not pertain to the Draft EIR analysis or findings, and instead expresses an opinion regarding how AMBAG should prioritize VMT reduction projects in San Benito County. Therefore, revisions to the Draft EIR are not necessary. However, private rideshare services, such as Uber and Lyft, are already available in many areas of the AMBAG region. Additionally, the proposed 2040 MTP/SCS includes projects that promote rideshare and commute alternatives. For example, the San Benito County Rideshare Program project (AMBAG ID: SB-COG-A08) would promote the use of alternative modes of transportation. The San Benito County Vanpool Program project (AMBAG ID: SB-COG-A53) would provide a vehicle lease program, planning and coordination for vanpool transportation.

Response 8.6
The commenter provides a list of comments specifically for the 2040 MTP/SCS. This comment pertains to the 2040 MTP/SCS and not the Draft EIR, and is therefore not responded to herein. Refer to Appendix K to the 2040 MTP/SCS for responses to comments pertaining to the 2040 MTP/SCS.
Dear AMBAG members,

The EIR should propose an alternative project based on implementing Personal Rapid Transit in our larger cities and, where practical, connecting our cities.

Personal Rapid Transit consists of podcars providing on-demand service on dedicated guideways, typically elevated above traffic. This technology has profound benefits including improved safety, elimination of emissions (if solar-powered), and a very convenient form of transportation.

Personal Rapid Transit technology must be included as an alternative, because it would dramatically reduce many of the “Significant and Unavoidable Impacts” listed on page 449 of the draft EIR document. For example,

- AQ-3, GHG-4: PRT reduces PM10 and GHG emissions because it can be solar-powered transportation. This is critical, given that page 282 of the draft EIR shows the existing Metropolitan Transportation Plan provides almost no reduction in carbon emissions, compared to the “no-build” alternative.
- B-1, B-2, B-3: PRT has minimal effects on plants, animals, sensitive habitats, and wildlife movements, because it is an elevated system with very little infrastructure on the ground.
- CR-1, CR-2, CR-3: PRT has minimal effects on historical, archeological, and paleontological resources, because it is an elevated system with very little infrastructure on the ground.
- E-2: PRT can be built with its own energy-producing infrastructure (solar panels).
- N-1, N-2, N-3, N-4: PRT uses electric podcars that are essentially silent with very little vibration.
- T-1, T-2: PRT provides a much more convenient and time-efficient form of public transportation, dramatically reducing the miles traveled in other vehicles.

Please include innovative alternative technology, such as Personal Rapid Transit, in the EIR.

Sincerely,

Brett Garrett
190 Walnut Ave #307
Santa Cruz, CA 95060
Response 9.1

The commenter states that the Draft EIR should include an alternative based on Personal Rapid Transit in the region’s larger cities, and where practical, connecting cities. The commenter states that a Personal Rapid Transit alternative would avoid many of the significant and unavoidable impacts identified in the Draft EIR for the 2040 MTP/SCS.

To be legally adequate under federal transportation law and SB 375, the 2040 MTP/SCS is required to address transit projects, highway projects and a sustainable land use pattern. All three components are integrated into the fundamental project objectives described in the Draft EIR Section 2.1 (page 50). When a large-scale program contains multiple, interrelated objectives, an alternative that does not meet all of those objectives may be excluded from detailed analysis (see In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1162–1168). An EIR must discuss alternatives to a project in its entirety but is not required to discuss alternatives to each particular component of a project (see California Oak Foundation v. Regents of University of California (2010) 188 Cal.App.4th 227, 276-277). Therefore, an alternative to the 2040 MTP/SCS that would address only highway transportation with replacement of vehicle travel for Personal Rapid Transit is not required by CEQA.

Additionally, Personal Rapid Transit is not considered a feasible alternative to the 2040 MTP/SCS due to its low capacity. Personal Rapid Transit is more suited for small geographic areas with limited ridership, such as airport and campus transportation venues where a limited amount of guideway and number of stops/stations is required. However, cities such as Santa Cruz and Monterey are substantially larger than airports and college campuses and would require substantial amounts of guideway and stops for access to all neighborhoods and areas of the city. The amount of Personal Rapid Transit guideway that would be required for access to the various areas of the cities in the AMBAG region, especially larger cities as the commenter suggests, would not be feasible to implement. Section 15126.6 of the State CEQA Guidelines state that consideration of infeasible alternatives is not required in an EIR. Therefore, revisions to the Draft EIR are not necessary.

However, note that the 2040 MTP/SCS includes some projects with technological improvements. For example, the Multimodal WAVE ITS project in Monterey County would install advanced traveller information kiosks and related equipment in four MST buses. Another example is the Bus Tracking and AVL Transit Programs project in Santa Cruz County, which would install GPS bus tracking and Automatic Vehicle Locator programs to inform travellers of transit locations to allow them to make informed mode choices.

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12 As defined by the commenter, Personal Rapid Transit consists of podcars providing on-demand service on dedicated guideways, typically elevated above traffic.
February 5, 2018

Dear agency leaders, staff, and consultants,

Thank you for this opportunity to comment on these draft documents: Santa Cruz County Regional Transportation Plan 2040, AMBAG Metropolitan Transportation Plan + Sustainable Communities Strategy, and the related Draft Environmental Impact Report.

To spare tomorrow’s world from catastrophic climate change, and to consciously plan livable communities, all human society must act boldly now to get off fossil fuels. We must transform, away from the intensive energy demand inherent in an auto-centric transportation system.

It is not enough to nibble around the edges with some limited, timid transportation tweaks to encourage more sustainable travel modes. Not enough, when the centerpiece transportation planning program remains continuing investments serving individual automobile-based transportation that contributes substantially and steadily to destroying the stability of our planetary life support systems, climate in particular.

The selection of a project alternative that the Draft EIR states plainly does not follow State of California law, including 2016’s SB 32, comes close to an acknowledgement that agency leaders, agency staff, and assisting consultants together were somehow not able to devise a better project alternative than the damaging one recommended to go forward. The Draft EIR acknowledges in Impact GHG-4 that, quote, “THE 2040 MTP/SCS WOULD CONFLICT WITH THE STATE’S ABILITY TO ACHIEVE THE AB 32, SB 32 AND EO-S-3-05 GHG REDUCTION GOALS. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.”

Translated, the preceding statement in the Draft EIR admits the MTP, RTPs, and Draft EIR settle on a transportation scheme that does not do its part to save our common future from climate change.

Why do these plans not instead propose an alternative transportation plan that would work comprehensively to transform transportation systems and resulting land uses to a far more sustainable system?

Are these draft documents ultimately concluding that destroying the future is just inevitable due to politics, inertia, and lack of vision? I don’t accept such an outcome, and you should not either.

To understand the Draft EIR sentence quoted above, I observe that California Senate Bill 32 (SB 32), signed into law by Governor Brown on September 8, 2016, requires a 40% cut in greenhouse gas emissions (relative to 1990 levels) by the year 2030. While the California Air Resources Board may have not yet adopted an explicit schedule of more stringent, ongoing regional GHG reduction targets, is it not obvious, as well as morally imperative, that a long range transportation plan must act now in good faith to achieve the results called for by SB 32, in just the next twelve years to 2030?
Sincerely,

Jack Nelson  
Land Use Planner and Environmental Planner (County of Santa Cruz, retired)  
Chair, Sierra Club Transportation Committee, Santa Cruz Group (speaking as an individual)

PS: I concur with, and support the separate comments on the Draft EIR lately submitted (approx. Feb 1 – 5th) from the Campaign for Sensible Transportation.
Appendix F: Response to Comments

Letter 10

COMMENTER: Jack Nelson

DATE: February 5, 2018

Response 10.1

The commenter expresses an opinion that society must move away from automobile-based transportation if future generations are to be spared catastrophic climate change, and that limited tweaks to the transportation system will be insufficient. Climate change related impacts are addressed in Section 4.8, Greenhouse Gas Emissions/Climate Change, of the Draft EIR. This comment primarily pertains to societal values regarding transportation choices and climate change, and does not raise significant environmental issues related to the Draft EIR analysis or findings. Therefore, this comment is noted and does not require further response or revisions to the Draft EIR.

Response 10.2

The commenter quotes an excerpt of Impact GHG-4 of the Draft EIR regarding significant and unavoidable impacts related to conflicts with the State’s ability to achieve greenhouse gas (GHG) reduction goals. The commenter suggests that these findings acknowledge that an alternative with fewer GHG emissions and climate change impacts could not be developed, and the 2040 MTP/SCS does not contribute to preventing future climate change impacts.

As discussed in Response 7.4, by preparing an MTP/SCS that meets SB 375 passenger vehicle GHG reduction targets, AMBAG is complying with its applicable legal requirements to help reduce GHG emissions. There is no legal requirement that the AMBAG region’s MTP/SCS achieve GHG emission reductions proportional to State reductions called for by AB 32, SB 32 and EO-S-3-05. CARB’s 2017 Scoping Plan presents the State’s strategy to achieve these State GHG reduction goals, and does not call for proportional reductions in each region.

While the proposed 2040 MTP/SCS would have a significant and unavoidable impact related to potential conflicts with AB 32, SB 32 and EO-S-3-05 GHG reduction goals, as described in Impact GHG-4, it would reduce per capita GHG emissions in the region, as described on page 283 of the Draft EIR. A reduction in per capita emissions would contribute toward reducing the impacts of global climate change.

Response 10.3

The commenter asks why the plans do not propose an alternative transportation plan that would work to transform transportation systems and resulting land uses to a more sustainable system.

The commenter refers to “plans”, which is assumed to mean the proposed 2040 MTP/SCS and Regional Transportation Plans (RTPs), when taken in context with prior comments in the comment letter. Therefore, this comment appears to pertain to the 2040 MTP/SCS and RTPs and not the Draft EIR. However, Section 7 of the Draft EIR, Alternatives, includes an analysis of three alternatives to the proposed 2040 MTP/SCS. As described on pages 452 and 453 of the Draft EIR, these alternatives include: 1) Alternative 1: No Project Alternative; 2) Alternative 2: Liveable Communities Alternative; and 3) Alternative 3: Maintained Mobility Alternative. Table 54 of the Draft EIR, on page 473, shows that Alternative 2 would result in fewer GHG emissions and climate change impacts compared to
Association of Monterey Bay Area Governments

2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

the proposed 2040 MTP/SCS. However, as described on page 471 of the Draft EIR, implementation of Alternative 2 may not be feasible because AMBAG does not have land use authority and cannot require local agencies to change their land use designations that are required for Alternative 2. Additionally, similar to the proposed 2040 MTP/SCS, the GHG emissions and climate change impacts under Alternative 2 would also be significant and unavoidable and require the same mitigation measures as the 2040 MTP/SCS, as described on page 462 of the Draft EIR.

The commenter does not suggest a specific feasible alternative that should have been included in the Draft EIR that would comprehensively “transform transportation systems and resulting land uses to a far more sustainable system,” so a more specific response to this suggestion is not possible. However, please see Response 7.4 for an explanation as to why an MTP/SCS alternative that would achieve deep regional reductions in GHG emissions consistent with State GHG reduction goals is infeasible for AMBAG to implement.

Response 10.4

The comment asks whether these “draft documents ultimately concluding that destroying the future is just inevitable” due to various factors. The commenter refers to “draft documents”, which is assumed to mean the proposed 2040 MTP/SCS, Santa Cruz RTP and Draft EIR, when taken in context with the comment letter in its entirety. The documents do not contain the general conclusion suggested by the comment. The comment does not raise a specific significant environmental issue, so a more specific response is not possible. However, Impact GHG-4, on pages 284 through 286 of the Draft EIR, was found to be significant and unavoidable because the 2040 MTP/SCS would conflict with the State’s ability to achieve the GHG reductions goals of AB 32, SB 32 and EO-S-3-05. However, the Draft EIR provides mitigation measures to reduce impacts related to GHG emissions and climate change to the extent feasible, per State CEQA Guidelines. Additionally, as described in Impact GHG-3 on pages 282 and 283 of the Draft EIR, implementation of the 2040 MTP/SCS would be consistent with AMBAG’s SB 375 GHG reduction targets of zero percent change in 2020 and five percent increase in 2035. These projections do not account for any additional measures from the current SB 32 Scoping Plan to further reduce passenger vehicle GHG emissions and are, therefore, conservative. As such, the 2040 MTP/SCS would contribute to an overall reduction in per capita passenger vehicle-related GHG emissions. Therefore, revisions to the Draft EIR are not necessary.

Response 10.5

The commenter states that although the California Air Resources Board has yet to adopt regional GHG reduction targets pursuant with SB 32, a long-range transportation plan should act in good faith to achieve the SB 32 reduction goals. Impact GHG-4 on pages 284 through 286 of the Draft EIR discuss the potential for the 2040 MTP/SCS to conflict with the State’s ability to achieve SB 32 2030 GHG reduction goals, and concludes that it does. As explained in Response 7.11, there is no legal requirement that the AMBAG region’s MTP/SCS achieve GHG emission reductions proportional to State reductions called for by SB 32. Nevertheless, as explained in Response 7.11, it is not possible for AMBAG or the RTPAs to develop a feasible alternative to the proposed 2040 MTP/SCS that would achieve theoretical regional reductions in total GHG emission proportional to the State GHG reductions goals of SB 32.
Response 10.6

The commenter states concurrence with and support for the comments on the Draft EIR submitted by the Campaign for Sensible Transportation. This comment is noted. Please refer to the responses to letter 7, which is the comment letter submitted by the Campaign for Sensible Transportation.
Dear Ms. Adamson,

I could not find a link on the AMBAG website for direct comment submission regarding the 2040 Moving Monterey Bay Forward Draft 2040 Plan or the MTP/SCS Draft 2040 Plan. I am sending my comments to you and ask that you forward them to the appropriate person. I am copying Ms. Parra and trust that these comments will also be directed to the Santa Cruz Regional Transportation Commission as written communication for consideration at the next Commission meeting.

Thank you very much for making the loaded flash drives with all reports and documentation available at the January 30 Open House and Public Hearing. I was able to review the material successfully from my home computer system and therefore was not restricted to visiting the public library.

Thank you very much. Please acknowledge that you have received my message.

Sincerely,
Becky Steinbruner

COMMENTS:

Executive Summary:

1) On Page. 4, it states "This is a programmatic EIR" and not intended to address site-specific impacts of individual projects (many of which are not yet defined). However, this Report is a first-tier EIR and will allow individual land use (including mixed-use, residential, transit) projects that are consistent with the Report to proceed as "Opportunity Areas" and qualify for CEQA streamlining. I oppose this method of seemingly reducing the public process on future land use projects within the various jurisdictions covered by this first-tier EIR.

2) Although the Summary states that "AMBAG has no jurisdiction over land use regulation, the EIR for the MTP/SCS will outline how to require mitigation measures that can be enacted in a manner to "ensure CEQA streamlining by implementing agencies for qualifying projects, per SB 375 and other laws." I find this deceitful. AMBAG claims on one hand to have no authority yet determines significance of impacts associated with local projects and sets all mitigation requirements for projects within the jurisdictions. Local government agencies repeatedly cite reports such as this to the public as to why projects must occur in a certain manner or indeed, why they occur at all.

3) Historic Resources
Santa Cruz County government prefers to demolish historic and cultural resources and cannot be trusted to uphold the levels of mitigation and protection in the MTP/SCS

4) Water Resources
I want to point out that there is a void in the EIR regarding the San Lorenzo River and Soquel Creek, as well as North Coast streams (pre-1914 water rights)

I am submitting this now, to meet the 5pm deadline, but will continue in a separate message and ask that it also be included.

Sincerely,
Becky Steinbruner
Association of Monterey Bay Area Governments
2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

Letter 11

COMMENTER: Becky Steinbruner
DATE: February 5, 2018

Response 11.1
The commenter notes that they were unable to find a link for comment submission online, and as an alternative, provided their comments via email. The commenter asks that the submission of their comments be acknowledged. This comment does not pertain to the analyses or conclusions of the Draft EIR, and revisions are not required. However, this written response is provided to acknowledge receipt of the commenter’s submittal.

Response 11.2
The commenter disapproves that the Draft EIR has been prepared to allow future qualifying projects to streamline their environmental review because it seemingly reduces opportunities for public involvement on future land use projects.

As described on page 35 of the Draft EIR, the Draft EIR has been prepared to allow qualifying projects to streamline their environmental review pursuant to Senate Bill (SB) 375. As described on page 38 of the Draft EIR, SB 375 provides streamlining benefits for Transit Priority Projects (TPP) and certain mixed use projects. TPPs that meet a detailed list of criteria set forth in Public Resources Code (PRC) Section 21155.1 are termed Sustainable Communities Projects and are statutorily exempt from CEQA. A TPP that does not qualify for the statutory exemption may be eligible to comply with CEQA using a Sustainable Communities Environmental Assessment or a TPP EIR, both of which would be subject to a public review and comment period. Therefore, CEQA streamlining would not necessarily reduce public involvement, depending on the type of project and project-specific impacts. Also, CEQA streamlining would not preclude the public notice and hearing requirements established by State planning and zoning law.

Nonetheless, the process, protocol, requirements and regulations related to CEQA streamlining established under SB 375 were previously enacted by the State, separate from the proposed 2040 MTP/SCS and Draft EIR. Therefore, this comment pertains to State regulations and does not raise a significant environmental issue related to the Draft EIR.

Response 11.3
The commenter asserts that the Draft EIR mischaracterizes AMBAG’s jurisdiction over land use regulations because AMBAG is determining the significance of impacts and mitigation requirements for projects within the jurisdiction of local government agencies in the Draft EIR. The commenter states that local agencies repeatedly cite reports similar to the Draft EIR as to why projects must occur and in what manner.

According to Section 15367 of the State CEQA Guidelines, a CEQA lead agency is the public agency that has the principal responsibility for carrying out or approving a project, in this case the 2040 MTP/SCS. As described on page 43 of the Draft EIR, because AMBAG holds the principal responsibility for approving the 2040 MTP/SCS, it is the CEQA lead agency, consistent with State CEQA Guidelines Section 15367. CEQA requires that lead agencies consider both mitigation measures they can implement, and mitigation measures that “can and should” be adopted by other
Appendix F: Response to Comments

Agencies with responsibility and jurisdiction for implementation. See *State CEQA Guidelines* Section 15091(a)(2).

The proposed 2040 MTP/SCS does not authorize or provide entitlement to development or construction projects in the AMBAG region. Rather, the proposed 2040 MTP/SCS is a regional strategy that sets a vision for future development; individual development projects must still be reviewed, analyzed and approved by local governments, which retain full control over local land use authority, pursuant to Government Code 65080(b)(2)(K). As described on pages 80 and 81 of the Draft EIR, the Draft EIR includes proposed mitigation measures to reduce impacts and identifies agencies for implementation of those mitigation measures. AMBAG, TAMC, SBtCOG and SCCRTC have lead agency status; and therefore, authority to enforce mitigation measures for projects for which they have discretionary authority. However, AMBAG, TAMC, SBtCOG and SCCRTC do not have authority to require recommended mitigation measures be implemented by other agencies that would be lead agencies for future land use development projects (e.g., cities and counties). It is the responsibility of the lead agency implementing specific 2040 MTP/SCS projects to conduct environmental review consistent with CEQA, and where applicable, incorporate mitigation measures provided in the Draft EIR. Project-specific environmental documents may adjust the mitigation measures identified in this EIR as necessary to respond to site-specific conditions. AMBAG is required to identify mitigation, but implementation of the mitigation is at the discretion of the lead agency for the project-level environmental review.

Response 11.4

The commenter expresses an opinion that the County of Santa Cruz prefers to demolish historic and cultural resources and cannot be trusted to implement or enforce the mitigation measures pertaining to these resources in the Draft EIR. The comment does not provide evidence to support this opinion, so no further response is required.

However, impacts to historic and cultural resources are addressed in Section 4.5, *Cultural and Historic Resources*, of the Draft EIR. As discussed therein, historic properties and cultural resources are protected by numerous federal and State laws and regulations. These laws and regulations, which are described on pages 214 through 217 of the Draft EIR, include the National Historic Preservation Act of 1966, Department of Transportation Act, and several sections of the California Public Resources Code. Additionally, as described on page 220 of the Draft EIR, Santa Cruz County Municipal Code Title 16 outlines the procedures that must be implemented to determine the significance of cultural and historic resources in the county, and what protection measures must be established depending on their significance. Compliance with laws, regulations and ordinances is mandatory, regardless of potential CEQA mitigation requirements. Additionally, the Draft EIR identifies mitigation measure CR-1, which would require a project-specific assessment of historical resources, and avoidance or redesign of project features to reduce impacts to historical resources, where feasible. Cities and counties in the AMBAG region, including the County of Santa Cruz, “can and should” implement this mitigation measures. However, project-specific environmental documents may adjust the mitigation measures as necessary to respond to site-specific conditions.

Response 11.5

The commenter states that discussion of water resources in the Draft EIR are missing descriptions of pre-1914 water rights associated with the San Lorenzo River and Soquel Creek, as well as other North Coast streams. The comment does not explain how these omissions are relevant to the 2040 MTP/SCS environmental impacts.
Water supply impacts of the 2040 MTP/SCS are discussed at a programmatic level in Draft EIR Impact W-2 on pages 336-338. A discussion or inventory of existing pre-1914 water rights on individual streams is unnecessary to reach the EIR’s conclusion that 2040 MTP/SCS water supply impacts, including potentially new or expanded entitlements such as water rights, are significant. However, the San Lorenzo River is described as a major river and watershed in the AMBAG region on page 171 of the Draft EIR. Page 319 of the Draft EIR describes the San Lorenzo River a primary source of water for the City of Santa Cruz.
Dear Ms. Adamson,
I would like to continue with comment regarding the AMBAG MTP/SCS and hope that you will add the material below to the previous comment. I was worried about my comment not being accepted if received after the 5pm deadline today, so sent what I felt was most critical first.

Thank you very much.
Sincerely,
Becky Steinbruner

***************
CONTINUED COMMENT RE: MTP/SCS DRAFT 2040 EIR
Executive Summary
5) Discussion of Alternatives: I think it should be stated that "NO Project" would maintain the current AMBAG recommendations for transit and land use, as stated in the 2035 Plan. This Plan was thoroughly vetted and contains tested models for population growth, just as the 2040 Draft Plan supports, but the EIR spends little time discussing the differences between the 2035 Plan and the 2040 Plan, only that the later meets the SB 375 requirements for local jurisdictions to streamline CEQA process, most notably the careful examination of environmental impacts and full public process. I do not consider that an improvement for the public or for overall environmental protection safeguards. Please clearly discuss the differences in the 2035 Plan and 2040 Plan in the Executive Summary.

6) Table 2 Mitigations are extensive yet it is stated that "Transportation project implementing agencies"
"Based on my experiences with Santa Cruz County government in various development projects in the past three years, I feel there is no hope that these mitigations will be followed or enforced if any are adopted. For example, in AES-1(b) "new roadways, extensions and widening of existing roadways"
"Already, multiple significant Cypress trees and locust trees have been removed at the corner of Soquel Drive and State Park Drive by the County, I assume in preparation for adding lanes in the area (which is a mitigation measure associated with the Aptos Village Project). Further, I am concerned that the last of three Significant Heritage Cypress trees on Soquel Drive is destined for removal by the County for Soquel Drive improvements. The other two were cut down to make room for the Santa Cruz Community Foundation building. The remaining tree marks the lands that were once part of the adjacent historic Vincent Castro Rancho Aptos land.

I recently wrote Ms. Berge at County Public Works to inquire about any future plans in that area that would involve this remaining Significant Heritage Cypress tree. To date, I have received NO response and am even more worried that any day the tree will be cut....that is the pattern that Santa Cruz County local government follows.

Here is a copy of the messages I have sent to Ms. Berge on the matter:

Dear Ms. Berge,
I have not received a reply from you regarding my questions about future road improvements near Rancho del Mar Center in Aptos. Please respond.
I am concerned that the Significant Heritage Cypress tree near Chase Bank will be cut down before any members of the public even are aware of work planned for the area. I have copied the text of the Santa Cruz County Significant Tree Ordinance that defines the purpose and intent of the law:

(A) The Board of Supervisors of Santa Cruz County finds that the trees and forest communities located within the County’s Coastal Zone are a valuable resource. Removal of significant trees could reduce scenic beauty and the attractiveness of the area to residents and visitors.

(B) The Board of Supervisors further finds that the preservation of significant trees and forest communities on private and public property is necessary to protect and enhance the County’s natural beauty, property values, and tourist industry. The enactment of this chapter is necessary to promote the public health, safety, and general welfare of the County, while recognizing individual rights to develop, maintain, and enjoy the use of private property to the fullest possible extent. [Ord. 3443 § 1, 1983; Ord. 3341 § 1, 1982].

Please acknowledge that you have received this message. Thank you.

Sincerely,
Becky Steinbruner

On Tuesday, December 19, 2017 12:13 PM, Becky Steinbruner wrote:

Dear Ms. Berge,
I wonder if there are any road improvements planned for Soquel Drive near the Rancho del Mar Center in Aptos? There is extensive construction work occurring there, and I wonder if there are any plans that would affect the area roadways?

I noticed that the large heritage cypress trees at the corner of State Park Drive and Soquel Drive were removed; are additional lanes are planned for that intersection? Are there any plans that would necessitate removal of the heritage cypress tree on Soquel Drive near Chase Bank?

I look forward to your response.
Thank you,
Becky Steinbruner

7) Biotic Assessment Mitigations. Again, Santa Cruz County cannot be trusted to enforce any such mitigations when large developers are involved in projects. For example, the Biotic Mitigation the 2040 MTP/SCS Draft EIR recommends that a qualified biologist evaluate the construction area no more than 14 days before the start of construction work for bat and nesting birds. The Santa Cruz County Planning Department allowed the Aptos Village Project developers to submit these evaluations over six months before construction actually began. Bat assessments were critical for the historic Hihn Apple Barn, a known roosting and breeding site. The biologist assessment was conducted during winter months. Construction and Barn relocation did not begin until the following September, with no biotic updates. Most all possible trees within the construction envelope were cut down in January, 2016 but the two Significant Heritage Redwood trees, identified in the Initial Study as roosting and possible nesting site for hawks, were cut down in February, 2016. The Santa Cruz County Planning Department did not enforce the mitigations required.

8) Historic Resources Impacts and Mitigations. The CR-1 mitigation to require "prior to permit issuance, a map is to be prepared of the Area of Potential Effects" and "if there exist structures 45 years of age and older," jurisdictions or developers "must do a survey and evaluation of structures to determine eligibility for State, Federal and Local preservation. The evaluation SHALL be prepared by an architectural historian or historical architect meeting professional qualification standards of the Secretary of Interior and evaluation SHALL comply with CEQA guidelines 15064.5(b)." Santa Cruz County government cannot be trusted to meet these requirements nor to enforce that large developers who present Planned Unit Development permits will indeed follow through with any such mitigation requirements. This has been borne out with the Aptos Village Project and is being repeated now with a similar project in Live Oak involving a significant historic and cultural resource.
The County of Santa Cruz does not have on staff or on contract a qualified architectural historian or historical architect to meet the mitigations recommended in the 2040 MTP/SCS Draft EIR. In fact, the only review of historic and cultural resource projects is by a citizen volunteer Historic Resources Commission, which has repeatedly allowed significant historic structures to be demolished. Recent examples of this are the Aptos Fire House in the Aptos Village Project, and the house at 8057 Valencia Street, an NR-3 structure that was the oldest remaining house in the historic Hihn Subdivision. Here is a link to a YouTube video documenting that “partial demolition” with no preservation whatsoever. https://www.youtube.com/watch?v=QYz83f5zNyM&feature=youtu.be

The Santa Cruz County Planning Department allows over-the-counter issuance of demolition permits for historic structures, and staff time necessary to secure necessary permits is waived. Another historic resource recently granted such a demolition permit was the Soquel Village Millsap House built in 1890. Nothing was preserved. Here is a YouTube video of that demolition:

9) The Santa Cruz County Planning Department and Department of Public Works has no regard for following mitigations outlined in the Tribal Resources mitigations recommended in the 2040 MTP/SCS Draft EIR. the Aptos Village Project construction envelope boundary includes a documented Archaeologic Site CA-SCR-222/H. However, despite public outcry and protests at the Aptos Village Project site, the County did not hold the Aptos Village LLC developers accountable to following required CR-mitigations for the Project and never required a Native American observer be present. Rarely has there been any qualified archaeologic observer present at the massive earth disturbance areas that have taken place. Further, the County Department of Public Works staff has informed me that their project involving excavation of 1880's railroad beds in Aptos Village and surrounding areas is exempt from any archaeologic observer requirement.

Clearly, the Santa Cruz County government cannot be trusted to follow any recommended AMBAG mitigation regarding historic and cultural resources.

10) Page 47 of Executive Summary further addresses "streamlining CEQA process." I object to this draft EIR "lays the groundwork for the streamlined review of the qualifying development projects that meet statutory criteria and are consistent with the 2040 MTP/SCS" plans, making them "eligible for " (Section 1.3.1). It appears to me that this draft EIR will in the future waive many public process opportunities within jurisdictional development projects and I am opposed to that obfuscation.

The Summary repeats this in the discussion of MAP-21 (Moving Ahead for Progress in the 21st Century) enacted in 2012. The MAP-21 criteria for project development places "economic development" as the first priority for evaluating future projects, along with "enabling global competitiveness, productivity and efficiency."

"Protecting the environment, improving quality of life, and consistency between State and Local planned growth and economic development patterns" does not appear until the fifth on the list. This is, coupled with the streamlined environmental review required under CEQA, does not adequately protect the natural resources, cultural and historic resources, or the hydrologic resources of the region, especially when it appears that the "streamlining of environmental review requirements" could very likely reduce or minimize opportunities for public input and and minimize government transparency. The Santa Cruz County government has shown an established pattern of ignoring the public in favor of promoting economic development and developer concessions.

Stronger wording must be included in all requirements for enforcement of mitigations in all areas of environmental review and further that the public must be given the opportunity to have full and free access to all documentation regarding projects. For any project involving more than one acre mixed-use development proposed, the public should be allowed to vote by yes/no ballot on the project.

I will have further comment regarding hydrologic and growth forecasts in the Draft EIR later this evening.

Thank you very much.
Sincerely,
Becky Steinbruner

On Monday, February 5, 2018 4:58 PM, Becky Steinbruner wrote:

Dear Ms. Adamson,
I could not find a link on the AMBAG website for direct comment submission regarding the 2040 Moving Monterey Bay Forward Draft 2040 Plan or the MTP/SCS Draft 2040 Plan. I am sending my comments to you and ask that you forward them to the appropriate person. I am copying Ms. Parra and trust that these comments will also be directed to the Santa Cruz Regional Transportation Commission as written communication for consideration at the next Commission meeting.

Thank you very much for making the loaded flash drives with all reports and documentation available at the January 30 Open House and Public Hearing. I was able to review the material successfully from my home computer system and therefore was not restricted to visiting the public library.

Thank you very much. Please acknowledge that you have received my message.
Sincerely,
Becky Steinbruner

COMMENTS:
Executive Summary:
1) On Page 4, it states "This is a programmatic EIR" and not intended to address site-specific impacts of individual projects (many of which are not yet defined). However, this Report is a first-tier EIR and will allow individual land use (including mixed-use, residential, transit) projects that are consistent with the Report to proceed as "Opportunity Areas" and qualify for CEQA streamlining. I oppose this method of seemingly reducing the public process on future land use projects within the various jurisdictions covered by this first-tier EIR.

2) Although the Summary states that "AMBAG has no jurisdiction over land use regulation, the EIR for the MTP/SCS will outline how to require mitigation measures that can be enacted in a manner to "ensure CEQA streamlining by implementing agencies for qualifying projects, per SB 375 and other laws." I find this deceitful. AMBAG claims on one hand to have no authority yet determines significance of impacts associated with local projects and sets all mitigation requirements for projects within the jurisdictions. Local government agencies repeatedly cite reports such as this to the public as to why projects must occur in a certain manner or indeed, why they occur at all.

3) Historic Resources
Santa Cruz County government prefers to demolish historic and cultural resources and cannot be trusted to uphold the levels of mitigation and protection in the MTP/SCS

4) Water Resources
I want to point out that there is a void in the EIR regarding the San Lorenzo River and Soquel Creek, as well as North Coast streams (pre-1914 water rights)

I am submitting this now, to meet the 5pm deadline, but will continue in a separate message and ask that it also be included.

Sincerely,
Becky Steinbruner
Response 12.1

This comment letter was submitted at 6:52 PM on February 5, 2018, after the close of the public review and comment period for the Draft EIR. Although a response is not required for comments submitted after the closing date, AMBAG has elected to accept and respond to these comments.

Response 12.2

The commenter states that the No Project Alternative analyzed in the Draft EIR should include the continued implementation of the existing 2035 MTP/SCS land use and transit recommendations. As described on page 46 of the Draft EIR, under both federal and State law, regional transportation planning agencies (RTPA) and metropolitan planning organizations (MPO) must update and replace RTPs and MTP every four years. The existing 2035 MTP/SCS was adopted in 2014 and must be updated and replaced to meet the federal and State legal requirements. The continued implementation of the existing 2035 MTP as an alternative to the proposed 2040 MTP/SCS would not meet legal requirements, and would not represent “what would reasonably be expected to occur in the foreseeable future” (State CEQA Guidelines Section 15126.6(e)(2)) if the 2040 MTP/SCS were not approved. Therefore, inclusion of the continued implementation of the 2035 MTP as a No Project Alternative is not warranted. However, the Draft EIR in Section 7.3, starting on page 453, does include the No Project Alternative pursuant to Section 15126.6 of the State CEQA Guidelines.

Response 12.3

The commenter observes that the Draft EIR spends little time discussing the differences between the 2035 Plan and the 2040 Plan, and expresses an opinion that CEQA streamlining under SB 375 is not beneficial for environmental protection or public involvement. This comment does not raise a significant environmental issue related to Draft EIR content.

This comment pertains to SB 375 and its associated regulations allowing CEQA streamlining for certain types of qualifying projects. These regulations were previously enacted by the State separate from the proposed 2040 MTP/SCS and Draft EIR. The proposed 2040 MTP/SCS has been prepared consistent with the existing SB 375 regulations. Because this comment expresses an opinion pertaining to existing State regulations, no further response is required.

Response 12.4

The commenter requests that the Executive Summary of the Draft EIR include a clear discussion of the differences between the existing 2035 MTP/SCS and the proposed 2040 MTP/SCS.

The State CEQA Guidelines do not require the Executive Summary or any other sections of an EIR to describe the differences between an existing plan and an updated plan, when adoption of such plan constitutes the proposed project and discretionary decision. Additionally, because the 2040 MTP/SCS completely replaces the 2035 MTP/SCS, the Draft EIR analyzes the 2040 MTP/SCS in its entirety, rather than the changes and differences between the 2035 and 2040 MTP/SCS. Therefore, revisions to the Draft EIR are not necessary.
Response 12.5

The commenter expresses an opinion that the County of Santa Cruz will not implement or enforce the mitigation measures contained in the Draft EIR, based on anecdotal observations of a specific past project.

As described on pages 80 and 81 of the Draft EIR, it is the responsibility of the lead agency implementing specific 2040 MTP/SCS projects to conduct environmental review consistent with CEQA, and where applicable, incorporate mitigation measures to reduce potential impacts. Local agencies, such as the County of Santa Cruz, can and should implement mitigation measures contained in the Draft EIR. These agencies may also modify the mitigation measures or identify new mitigation measures in project-specific environmental review documents. Further, implementing agencies are required to adopt a Mitigation Monitoring and Reporting Program to assure that adopted mitigation measures are implemented. See also Response 11.3.

Response 12.6

The commenter expresses concern that as part of improvements to Soquel Drive, the County of Santa Cruz will remove a cypress tree that the commenter notes is a Significant Heritage Tree.

The Draft EIR provides a programmatic assessment of the potential impacts of the proposed 2040 MTP/SCS, focusing on the entire set of projects and programs contained in the proposed 2040 MTP/SCS, which would occur throughout Monterey, San Benito and Santa Cruz counties. Individual land use transportation project impacts are not addressed in detail; rather, the focus of the Draft EIR is on the entire program of projects, in the aggregate. Project-level impacts of the Soquel Drive improvements, including impacts related to a specific tree, would be evaluated in a future project-level environmental review of the Soquel Drive improvements. Therefore, revisions to the Draft EIR to address a single specific tree are not warranted.

Refer to Impact B-4 in Section 4.4, Biological Resources, of the Draft EIR for a discussion of program-level impacts related to tree removal. As noted therein, all future transportation projects proposed for implementation under the 2040 MTP/SCS would be required to follow city and county development requirements, including compliance with local policies, ordinances and applicable permitting procedures related to tree protection. Project-level analysis would identify significant conflicts with local policies and ordinances as well as minimize, mitigate or avoid those impacts through the design, siting and permitting process; and provide mitigation for any significant impacts as a condition of project approval and permitting.

Response 12.7

The commenter expresses an opinion regarding the willingness of the County of Santa Cruz to implement and enforce mitigation measures. The commenter provides an example of a prior instance when they feel the County of Santa Cruz did not implement a mitigation measure. This comment is similar to comment 12.5. Please see Response 12.5.

Response 12.8

The commenter expresses an opinion that the County of Santa Cruz will not enforce mitigation measure CR-1 on page 22 of the Draft EIR. The commenter lists two examples of prior instances that they feel Santa Cruz County did not implement or enforce a mitigation measure similar to CR-1. This comment is similar to comment 12.5. Please see Response 12.5.
Association of Monterey Bay Area Governments

2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

Response 12.9

The commenter states that the County of Santa Cruz does not have on staff or on contract a qualified architectural historian or historical architect to meet requirements of the mitigation measure CR-1 in the Draft EIR. The commenter states that in the county, review of historic and cultural projects is conducted by a citizen volunteer group, which has repeatedly allowed the demolition of historic structures.

This comment pertains to the enforceability of mitigation measures provided in the Draft EIR and is similar to comment 12.5. Please see Response 12.5. As noted therein, as well as on page 81 of the Draft EIR, AMBAG does not have the legal authority to require the County of Santa Cruz or other agencies to implement and enforce the mitigation measures contained in the Draft EIR. Therefore, revisions to the Draft EIR are not necessary, consistent with Response 12.5. It is worth noting, however, that if the County of Santa Cruz were to include Mitigation Measure CR-1 on page 222 of the Draft EIR in future project-level environmental review documents, the county could hire or contract with a qualified architectural historian or historical architect at that time. Likewise, project proponents and applicants may also hire a qualified architectural historian or historical architect as the need arises.

Response 12.10

The commenter asserts disapproval that the County of Santa Cruz Planning Department allows over-the-counter issuance of demolition permits for historic structures. The commenter lists a recent example of demolition that the commenter claims was permitted in this manner and provides a website link to a video of the demolition. This comment is similar to comment 12.5. Please see Response 12.5.

Further, because this comment expresses an opinion pertaining to the policies or practices of the County of Santa Cruz Planning Department regarding its permitting process, it does not raise a significant environmental issue related to Draft EIR content. Refer also to Response 4.3 for a discussion of the applicability of mitigation measures to cities and counties in the AMBAG region.

Response 12.11

The commenter expresses an opinion regarding the willingness of the County of Santa Cruz to implement and enforce mitigation measures in the Draft EIR pertaining to tribal resources, cultural resources and historic resources. This comment is similar to comment 12.5. Please see Response 12.5.

Response 12.12

The commenter disapproves that the Draft EIR has been prepared to allow future qualifying projects to streamline their environmental review because it seemingly reduces opportunities for public involvement on future land use projects. This comment is similar to comments 11.2 and 12.2. Please see Response 11.2 and Response 12.2. As stated therein, CEQA streamlining for certain types of qualifying projects is allowed under current State regulations, such as SB 375 and its implementing regulations, regardless of the potential adoption of the proposed 2040 MTP/SCS. The proposed 2040 MTP/SCS and the Draft EIR have been prepared consistent with these existing State regulations for the potential streamlining of qualifying projects, as allowable by State regulations. Because this comment expresses an opinion pertaining to existing State regulations, it does not raise a significant environmental issue related to Draft EIR content.
Association of Monterey Bay Area Governments
2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

Response 12.13

The commenter states that the Moving Ahead for Progress in the 21st Century Act (MAP-21) prioritizes economic development more than environmental protection and improvements to quality of life. The commenter states that when MAP-21 is coupled with CEQA streamlining, protection of the regions natural, cultural and historic and hydrologic resources would be inadequate. The commenter also expresses an opinion that CEQA streamlining is not beneficial for environmental protection or public involvement. This comment does not raise a significant environmental issue related to Draft EIR content.

The opinions expressed in this comment pertaining to CEQA streamlining and the opportunity for public review is similar to comments 11.2 and 12.2. Please see Response 11.2 and Response 12.2.

As described on page 47 of the Draft EIR, MAP-21 "requires that the MTP planning process provide for consideration of projects and strategies that will:

- Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity and efficiency;
- Increase the safety of the transportation system for motorized and non-motorized users;
- Increase the security of the transportation system for motorized and non-motorized users;
- Increase the accessibility and mobility of people and for freight;
- Protect and enhance the environment, promote energy conservation, improve the quality of life and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
- Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
- Promote efficient system management and operation; and
- Emphasize the preservation of the existing transportation system."

These considerations are not listed or presented in the Draft EIR in descending priority; nor does MAP-21 place any one consideration of more importance than another. Therefore, although support of the economy appears first on the list of MAP-21 considerations on page 47 of the Draft EIR, it holds no higher level of priority than the other items listed.

Response 12.14

The commenter expresses an opinion that the County of Santa Cruz has a demonstrated pattern of ignoring public input in favor of promoting economic development and developer concessions. Because this comment expresses an opinion pertaining to the priorities of the County of Santa Cruz, it not raise a significant environmental issue related to Draft EIR content, and no further response is necessary.

Response 12.15

The commenter asserts that the Draft EIR must include wording that mitigation measures will be enforced, and that the public must be given access to all documentation regarding the projects.

The Draft EIR's mitigation measures meet CEQA requirements, for example those established by State CEQA Guidelines Section 15126.4. This comment pertains to the enforceability of mitigation measures provided in the Draft EIR and is similar to comment 11.3. Please see Response 11.3. The
The commenter expresses an opinion that approval of mixed-use projects larger than one acre should be determined by a ballot vote. This comment pertains to existing regulations and policies regarding project review and approval decision processes, and does not raise a significant environmental issue related to Draft EIR content.

Response 12.17
The commenter provides a duplicate of letter 11. Please see Responses 11.1 through 11.5.
WATER SUPPLY

Santa Cruz County's water supply is not discussed thoroughly or necessarily correctly. Page 349 - "Current water need exceed available supplies in large parts of each of the four basins of the region." Why then does the 2040 Plan not address growth impacts on water supply/demand. "Additional water is not available from these sources [aquifers] to support current levels of demand or even modest future growth." "Water demand for the region is projected to EXCEED the projected supply by 54 MAFY in a normal year." Why is this not reflected in discussions regarding growth/infill?
Response 13.1

The commenter states that the Draft EIR acknowledges that groundwater aquifers in Santa Cruz County are in overdraft and do not allow for even future modest growth, and that water demand in the County is projected to exceed the projected supply. The commenter states that although the Draft EIR acknowledges these existing water supply conditions, the document does not thoroughly analyze the impacts on water supply that would result from the growth and infill development envisioned in the 2040 MTP/SCS.

The commenter accurately summarizes the existing conditions of Santa Cruz County’s water supply, as described on page 319 of the Draft EIR. Impacts of additional growth and infill development on water demand are evaluated under Impact W-2, which begins on page 336 of the Draft EIR. Specifically, the third paragraph under Impact W-2, on page 336, states that development associated with the land use scenario envisioned in the 2040 MTP/SCS may also impact water supplies, requiring additional water for mixed use development and infill development. The development envisioned by the 2040 land use scenario would increase the demand on the region’s water supply as a result of AMBAG’s regional growth forecast. Therefore, new or expanded water supplies, entitlements, or facilities may be required, and this impact was found to be significant and unavoidable in the Draft EIR. Revisions to the Draft EIR are not necessary because existing water supply and demand conditions are described accurately, and potential impacts of growth and infill development envisioned under the proposed 2040 MTP/SCS are evaluated under Impact W-2.
Verbal Comment from Draft EIR Public Hearing

COMMENTER: Lee Otter
DATE: January 30, 2018

Thank you Mr. Supervisor. 480 pages, Rincon did quite a job here, so this is pretty impressive challenge to us reviews. The first 60 pages or so are largely focused on mitigation measures for our regional transportation system and so I want to zero in on that and more particularly things that present a Coastal Act nexus, and maybe right at the top of the heap there is the issue of global climate change and sea level rise adaptation. This is something that we just got to take into account if we are looking down the road to 2040 and beyond, because whatever pattern I believe is in place by 2040 will have a lot to do with the pattern that exists for the rest of the century and we can see this in the existing pattern of roads, railways, bikeways and so forth that are in the central coast already. So, our agency will be submitting written comments later on so I will certainly not tire you out with all of those. But, I did want to first put in a plug for the continuity of the Monterey Bay Scenic Trail, which is part of the California Coastal Trail System and relate to you how the sea level rise adaptation needs to account for that. So, we need to anticipate impacts for regional transportation systems, that is roads, rail, bikeway, pedestrian pathways and the draft MTP does, but I believe it stays at 60,000 feet when it should be down around 30,000 feet and so there some addition detail might be a good idea. And this is because we believe the policies and mitigation measures should provide for periodic retreat and realignment in response to shoreline erosion and flooding. And planned retreat might be more practical for low capital investment projects like segments of the coastal trail that can be feasibly pulled back from the edge of the bluff as the need dictates. In contrast ridged structures like bridges and so forth are high investment and often cannot be feasibly or progressively retreated and they should be I would like to see the MTP call for the design so they are substantially elevated higher than is needed right now but will be needed down the line in the future. And we should error on the side of caution that is, provide lots of room for shoreline flooding shoreline retreat in so forth. We will be advocating that in our written comments and I will close with that.
Public Hearing Comment: Comment 14

COMMENTER: Lee Otter, California Coastal Commission

DATE: January 30, 2018

Response 14.1

The commenter states that accounting for climate change and sea level rise is important, and that the Coastal Commission will submit written comments on the Draft EIR pertaining to these issues. This comment is noted and does not require further response or revisions to the Draft EIR because it does not raise a significant environmental issue related to EIR content. The Coastal Commission’s written comments are included herein as Letter 1. Refer to Responses 1.1 through 1.9 for responses to these written comments.

Response 14.2

The commenter states that the continuity of the Monterey Bay Sanctuary Scenic Trail (MBSST) needs to account for sea level rise, and that consideration of future sea level rise should be more detailed in the 2040 MTP/SCS. The commenter states that policies and mitigation measures in the 2040 MTP/SCS should provide for periodic realignment of low-investment projects, like segments of the MBSST. The commenter states that the 2040 MTP/SCS should design high-investment projects, such as bridges, to account for sea level rise, shoreline flooding, and shoreline retreat.

This comment pertains to the 2040 MTP/SCS and revisions to the Draft EIR are not necessary. However, the commenter’s use of the term “mitigation measures” may suggest that they are also referring to the Draft EIR, in addition to the 2040 MTP/SCS. Therefore, the following response is provided to address the level of detail and analysis in the Draft EIR.

The Draft EIR provides a programmatic assessment of the potential impacts of the 2040 MTP/SCS, focusing on the entire set of projects and programs contained therein, which would occur throughout Monterey, San Benito and Santa Cruz counties. Individual transportation project impacts are not addressed in detail; rather, the focus of the Draft EIR is on the entire program of projects, in the aggregate. Project-level impacts and site-specific impacts related to the MBSST would be evaluated in a future project-level environmental review of the MBSST project. Therefore, revisions to the Draft EIR are not necessary. However, Impact GHG-5 on pages 286 through 288 of the Draft EIR addresses impacts related to sea level rise and coastal flooding. Mitigation measure GHG-5 on page 287 of the Draft EIR provides measures to reduce potential impacts related to sea level rise and coastal flooding.
Verbal Comment from Draft EIR Public Hearing

COMMENTER: Pauline Seals, Santa Cruz Climate Action Network

DATE: January 30, 2018

I am Pauline Seals, Santa Cruz Climate Action Network. First of all, I want thank you for doing this, and I want to thank you for all the work on bikes and all that other stuff. Yeah, I didn’t have time to read everything, but I did go to the Greenhouse Gas Section. The one thing I noticed is that you are using out of date models, that is to say the IPCC most recent thing is not that recent at all. It was published in 2013, based on data from 2011, because of the time it takes to put it together. There is a much more recent document, a U.S. document called NCA 4, which has more like 6 feet by 2100 or even sooner, of sea level rise. This needs to be taken into account. In the Green House Gas section which I went through briefly, there is a lot of reference to per capita. Well, you know Per Capita doesn’t count, it is the whole area. What the whole area is doing is the only thing that counts. And the conclusion was the whole plan would conflict with the state’s ability to achieve between SB 32 greenhouse gas reduction targets. I’m pointing at the document, not making this up. So, even with that, there will also be newer climate models being put into them, and it is not possible. And we have been a giant Greenhouse Gas Emitter, mostly through transportation. So, I look at this and I go $3 billion for roads $2.6 for transportation. Forget that, $.5 billion or less for roads $5 billion for transportation. Because then it wouldn’t be just going to maintenance then you could really revolutionize and create a world-class transportation system or at least get started. Such as if you have ever traveled around the cities in Europe, or even the countryside in Europe. They are so far ahead of us, it is sad. Thank you for the chance to speak.
Response 15.1

The commenter states that the GHG discussion in the Draft EIR uses an outdated information source published by the Intergovernmental Panel on Climate Change (IPCC) in 2013. The commenter states that a more recent document titled “NCA 4” should be used, which portrays higher sea level rise than the 2013 IPCC document.

The commenter appears to be referencing page 269 of the Draft EIR, which states “The most recent IPCC report (2013) predicts a mean sea level rise of 11 to 38 inches by 2100.” The 2013 report referenced in this excerpt from the Draft EIR is the most recent report published by IPCC pertaining to quantification of forecasted sea level rise. Therefore, the information source is not outdated.

The NAC 4 document that the commenter refers to is the Climate Science Special Report: Fourth National Climate Assessment, Volume I, published in 2017 by the United States Global Change Research Program. As stated in the 2017 document, “No single physical model is capable of accurately representing all of the major processes contributing to GMSL [global mean sea level] and regional/local RSL [regional sea level] rise.” Therefore, the 2017 document provides a range of potential sea level rise for the year 2100, with as little as 1 foot (12 inches) or as much as 8.2 feet (98.4 inches) by 2100. The values reported in the 2013 IPCC report (11 to 38 inches) generally fall within the range of the 2017 document, although the upper range of the 2017 document is substantially greater than 38 inches.

CEQA Guidelines Section 15151 allows for disagreement among experts when assessing environmental impacts of a proposed project. CEQA case law gives lead agencies considerable discretion in the choice among differing expert opinions and studies, such as projected sea level rise studies cited and used for the analysis in the 2040 MTP/SCS Draft EIR. Generally see CEB, Practice under the California Environmental Quality Act (2d. Ed.), Section 1.35 A lead agency may accept the environmental conclusions reached by the experts that prepared the EIR even though others may disagree with the underlying data, analysis or conclusions (see Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal. (1988) 47 Cal.3d 376, 408). Discrepancies in results arising from different methods for assessing environmental issues do not undermine the validity of the EIR analysis as long as a reasonable explanation supporting the EIR analysis is provided (see Planning & Conserv. League v. Castaic Lake Water Agency (2009) 180 Cal.App.4th 210, 243). The existence of differing opinions arising from the same pool of information is not a basis for finding the EIR to be inadequate; when approving an EIR, an agency need not correctly resolve a dispute among experts about the accuracy of the EIR’s environmental forecasts (see Eureka Citizens for Responsible Gov’t v. City of Eureka (2007) 147 Cal.App.4th 357 and California Oak Found. v. City of Santa Clarita (2005) 133 Cal.App.4th 1219, 1243. Therefore, consistent with CEQA case law, although the 2017 document forecasts a potential higher sea level elevation in 2100 compared to the 2013 IPCC report, AMBAG is not required to resolve the dispute between the two reports.

Additionally, the forecasted sea level elevations in the 2017 document would not change the analysis in the Draft EIR. The Draft EIR provides a programmatic assessment of the potential impacts of the proposed 2040 MTP/SCS, focusing on the entire set of projects and programs contained in the proposed 2040 MTP/SCS, which would occur throughout Monterey, San Benito and Santa Cruz counties. Individual land use development and transportation project impacts are not addressed in detail; rather, the focus of the Draft EIR is on the entire program of projects, in the aggregate. Project-level and site-specific impacts related to sea level rise would be evaluated in a future project-level environmental review. These future environmental reviews may use updated data and information pertaining to sea level rise compared to what is used in the Draft EIR.

Response 15.2

The commenter expresses a preference for consideration of total GHG emissions rather than per capita GHG emissions.

As described on page 46 of the Draft EIR, The Sustainable Communities Strategy and Climate Protection Act, Senate Bill (SB) 375 and the California Air Resources Board (CARB) require consideration of per capita GHG emissions. Therefore, to demonstrate compliance with CARB reduction targets, the Draft EIR presents GHG emissions on a per capita basis. However, the Draft EIR also includes total GHG emissions on a regional basis, in addition to a per capita basis. Specifically, Table 32, on page 282 of the Draft EIR, presents GHG emissions for the entire region. As shown in Table 32, regional emissions in 2040 with the 2040 MTP/SCS would be 4,593,410 metric tons carbon dioxide equivalent per year (MT CO₂e/year).

Response 15.3

The commenter correctly summarizes conclusions of the Draft EIR pertaining to conflicts with the State’s ability to achieve SB 32 GHG reduction goals. Because the commenter does not specifically question the analysis supporting this finding, further response is not required. It should be noted, however, that implementation of the 2040 MTP/SCS would reduce annual GHG emissions in 2040 compared to emissions that would occur without its implementation. As shown on Table 32 on page 282 of the Draft EIR, in 2040, GHG emissions would be reduced by 6,787 MT CO₂e/year with implementation of the 2040 MTP/SCS when compared to emissions without its implementation.

Response 15.4

The commenter states AMBAG should invest more in transportation and less on roads, which would allow for a world-class transportation system comparable to Europe. This comment pertains to the 2040 MTP/SCS. This comment does not raise significant environmental issues related to the analysis and findings of the Draft EIR, and no further response is required.
Verbal Comment from Draft EIR Public Hearing

COMMENTER: Becky Steinbruner

DATE: January 30, 2018

Thank you good evening my name is Becky Steinbruner and I am a resident of Aptos. And I guess I am a little confused here, there seem that there are different studies that are being discussed. I thought that there was something called Moving Monterey Bay Forward Draft 2040, is that the same as this? Because it seems there is some sort of a different document back there on the table. Online there are appendices and discussions about road modeling. So, I just wanted to put that out there because to me it seems a little confusing as to what we are really discussing here and what else is out there. There are a lot of transportation studies and things that I am hearing that in terms of Greenhouse Gasses the numbers being discusses are not even the same and cannot be the same because of different state and federal guidelines. So it is just this process is just very confusing for people and I really tried to do my homework. I want to just point out that in the document on the back table, it says that this plan is consistent with the Santa Cruz County General plan, that plan has not been updated since 1994, and so I have some questions about the congruity of that. And under the growth inducing impacts section 6.1.1 it says that the AMBAG Region is going to increase from 767,670 to by 2040 883,300 and yet in the version online that I read of the growth modeling it actually predicted a decrease in population and it didn’t explain that but it did go into detail in the document that several sets of data had been put in and compared to other models and it looked like population was going to go down. So that is not consistent with what is being reported in section 6.1.1 of this report on the back table. I also have a lot of concerns about water resources in the area and I want to point out that the document on the table does not even mention the San Lorenzo river valley watershed or the Soquel Creek Watershed those are two critical watersheds for Santa Cruz County. The report only talks about Pajaro and I know this regional report and Pajaro river does cover a big area but I think the report is negligent on considering that. And I think I am out of time and I will submit a written comment.
PUBLIC HEARING COMMENT: COMMENT 16

COMMENTER: Becky Steinbruner

DATE: January 30, 2018

Response 16.1

This comment pertains to the title used for 2040 MTP/SCS and discrepancies between the regulatory requirements of State and federal agencies regarding GHG emissions. This comment does not raise a significant environmental issue related to Draft EIR content. However, please refer to pages 270 through 275 of the Draft EIR for a summary of the federal and State regulations pertaining to GHG emissions. Additionally, for clarification purposes, “Moving Monterey Bay Forward Draft 2040” is the same document as the “2040 MTP/SCS,” which is the terminology used throughout the Draft EIR. The public hearing on January 30, 2018, was on both the 2040 MTP/SCS and the Draft EIR.

Response 16.2

The commenter states that the Draft EIR describes the 2040 MTP/SCS as being consistent with the Santa Cruz County General Plan, and has questions about congruity of this finding because the General Plan was last updated in 1994.

The Draft EIR considers the adopted Santa Cruz County General Plan; the adoption date of this document is outside AMBAG’s control. While a General Plan Update is currently underway, the document has not been released or adopted. Therefore, consideration of consistency with the update would not be feasible or appropriate in the Draft EIR.

Additionally, the commenter does not provide specific comments related to the consistency of the 2040 MTP/SCS with the Santa Cruz County General Plan. Therefore, specific response it is not possible. For informative purposes, consistency of the 2040 MTP/SCS with the Santa Cruz County General Plan is discussed on pages 440 and 441 of the Draft EIR. As described therein, the Santa Cruz County General Plan encourages new development within existing urban areas while preserving agricultural land and natural resources in the rural areas. The General Plan recognizes the various types of commute behavior and includes policies to provide adequate housing opportunities and encourage an employment base that supports a diversity of income levels. The 2040 MTP/SCS is generally consistent with the broad goals and policies of the Santa Cruz County General Plan in that both clearly support focused development within existing urban boundaries to preserve natural habitats and agricultural resources. Further, both documents address the importance of maintaining a job/housing balance by, in part, diversifying transportation options as well as supporting efforts focused on reducing regional traffic congestion.

Response 16.3

The commenter states that Section 6.1.1 of the Draft EIR describes population increasing from 767,670 to 883,300 by 2040. The commenter states that this is inconsistent with a growth model obtained online that predicted a decrease in population.

The commenter does not specify if an “online version” is the electronic version of the Draft EIR available for download on the AMBAG website, or if is an online version of some other document or study. Section 6.1.1, on page 447 of the Draft EIR, states that “According to the AMBAG Draft 2018 Final Environmental Impact Report F-109
Regional Growth Forecast, population in the AMBAG region is projected to grow from 762,676 in 2015 to 883,300 by 2040...” It is possible the commenter was viewing an older version of AMBAG’s growth forecast, but as described above, the 2018 forecast projects an increase in population. The electronic version of the Draft EIR on the website and print copies of the Draft EIR circulated for public review are identical, including page 447 of the Draft EIR. Without more specificity regarding what online document the commenter is referring to, no additional explanation or response to this comment is possible.

Response 16.4

The commenter expresses concern over water resources and states that the Draft EIR does not mention the San Lorenzo River watershed or the Soquel Creek watershed.

The San Lorenzo River is described as a major river and watershed in the AMBAG region on page 171 of the Draft EIR. Page 319 of the Draft EIR describes the San Lorenzo River a primary source of water for the City of Santa Cruz. Although Soquel Creek is not specifically described in the Draft EIR, the analysis of water quality and hydrology in the Draft EIR considers all waters and watersheds in Santa Cruz, San Benito and Monterey counties. It is unnecessary to list every watershed and creek in the region in order to provide a programmatic analysis of potential impacts to water quality and water resources. Therefore, revisions to the Draft EIR are not necessary.

Response 16.5

The commenter states that they will submit a written comment. Please refer to Letters 11, 12 and 13 for the written comments. Responses are provided to the letters, respectively, in Responses 11.1 through 11.5, Responses 12.1 through 12.17 and Response 13.1.
Other Revisions to the Draft EIR

This section presents other specific changes to the text of the Draft EIR that have been made to clarify information presented in the Draft EIR or to update information presented in the Draft EIR based on new regulatory or policy guidance since preparation of the Draft EIR. The changes in this section are in addition to the changes and revisions to the Draft EIR that have been made in response to the comments received on the Draft EIR, as presented in Section 1.2, Comments and Responses. In no case do these revisions represent “significant new information” that would trigger Draft EIR recirculation pursuant to State CEQA Guidelines Section 15088.5. For example, they do not disclose a new or substantially worsened significant environmental impact, or a new feasible mitigation measure or alternative not proposed for adoption.

Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined text. Text deleted from the Draft EIR is shown in strikethrough. Page numbers correspond to the page numbers of the Draft EIR.

The Table of Contents of the Draft EIR has been augmented as follows:

**Appendices**

- Appendix A Notice of Preparation and NOP Response Letters
- Appendix B 2040 MTP/SCS Transportation Project List
- Appendix C Performance Metric Data
- Appendix D Special Status Species
- Appendix E AB 52 Consultation
- Appendix F Response to Comments

Page 1 of the Draft has been revised to include the following changes:

The 2040 Association of Monterey Bay Area Governments (AMBAG) Draft Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS) is a long-range planning document required by both State and Federal law that is an update of the 2035 AMBAG MTP/SCS. Reference to the 2040 MTP/SCS throughout this Draft EIR Environmental Impact Report (EIR) refers to the Draft 2040 MTP/SCS. It contains a compilation of the projects proposed in the Draft Regional Transportation Plans (RTPs) prepared by the Transportation Agency for Monterey County (TAMC), the Council of San Benito County Governments (SBtCOG) and the Santa Cruz County Regional Transportation Commission (SCCRTC) as the state-designated Regional Transportation Planning Agencies (RTPAs) for Monterey, San Benito and Santa Cruz Counties, respectively. Transportation system improvement projects identified in the 2040 MTP/SCS include: active transportation projects, highway and local roadway projects, transportation demand management (TDM) projects, transit projects and other projects, such as airport operations, wildlife corridor crossing and administration and planning. A full list of transportation projects is provided in Appendix B. A copy of the Draft 2040 MTP/SCS is available for review at AMBAG offices (24580 Silver Cloud Court, Monterey, California, 93940), the TAMC offices (55 Plaza Circle B, Salinas, California 93901), the SBtCOG offices (330 Tres Pinos Road, Suite C7, Hollister, California 95023), the SCCRTC offices (1523 Pacific Avenue, Santa Cruz, California 95060), and on the AMBAG website: http://www.ambag.org/.
Issues to Resolve

CEQA Guidelines Section 15123(b)[3] requires that an EIR contain a discussion of issues to be resolved including the choice among alternatives and whether or how to mitigate significant effects. Issues to be resolved include:

• How to address impacts from the SCS land use scenario that must be mitigated by the local land use authority, given that AMBAG and the RTPAs do not have jurisdiction over land use regulations.
• How best to require mitigation measures that can be enacted by implementing agencies in a manner to ensure CEQA streamlining for qualifying projects, per SB 375 and other laws, can occur.
• Whether to approve the Draft 2040 MTP/SCS or an alternative.

AQ-4 Health Risk Reduction Measures. Transportation implementing agencies shall implement the following measures:

• During project-specific design and CEQA review, the potential localized particulate (PM
_\text{\textsubscript{10}}\text{ and } PM_{2.5}) impacts and their health risks shall be evaluated for the project using procedures and guidelines consistent with U.S. EPA 2015’s Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM_{2.5} and PM_{10} Nonattainment and Maintenance Areas. If required based on the project-level hot-spot analysis, project-specific mitigation shall be added to the project design concept or scope to ensure that local particulate (PM_{10} and PM_{2.5}) emissions would not reach a concentration at any location that would cause estimated cancer risk to exceed the 2015 Office of Environmental Health Hazard Assessment (OEHHA) threshold of 10 in one million. Per the U.S. EPA guidance (2015), potential mitigation measures to be considered may include but shall not be limited to: providing a retrofit program for older higher emitting vehicles, anti-idling requirements or policies, controlling fugitive dust, routing traffic away from populated zones and replacing older buses with cleaner buses. These measures can and should be implemented to reduce localized particulate impacts as needed.
• Retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with CARB and OEHHA requirements to determine the exposure of nearby residents to TAC concentrations.
• If impacts result in increased risks to sensitive receptors above significance thresholds, Plant trees and/or vegetation suited to trapping TACs and/or sound walls between sensitive receptors and the pollution source. This measure would trap TACs emitted from pollution sources such as highways, reducing the amount of TACs to which residents and other sensitive populations would be exposed.
Section 1, *Introduction*, on Page 35 of the Draft EIR has been revised to include the following changes:

Section 21000 et seq. of the California Public Resources Code, commonly referred to as the California Environmental Quality Act of 1970 (CEQA), requires the evaluation of environmental impacts associated with all planning programs or development projects proposed. As such, this EIR is an informational document for use by AMBAG, other agencies and the general public in their consideration and evaluation of the environmental consequences of implementing the proposed 2040 MTP/SCS and RTPs for the counties of Monterey, San Benito and Santa Cruz.

This Final EIR includes Responses to Comments on the Draft EIR (Appendix F) and the text of the Draft EIR, revised based on responses to comments and other information. New text added or edited from the Draft EIR is shown in underline format. In instances where changes to the document involve changed facts or information, the deleted text has been left in strikethrough format.

Section 1.4, *EIR Content and Format*, on page 41 of the Draft EIR has been revised to include the following changes:

This EIR has been organized into eight sections and six appendices. These include:

1.0 **Introduction**. Provides the project background, description of the type of environmental document and CEQA streamlining opportunities, and information about the EIR content and format.

2.0 **Project Description**. Presents and discusses the project objectives, project location and specific project characteristics.

3.0 **Environmental Setting and Impact Analysis Approach**. Provides a description of the existing physical setting of the AMBAG region, including a description of the regional transportation system, and discusses the EIR baseline and approach to direct and cumulative analyses.

4.0 **Analysis of Environmental Issues**. Describes existing conditions found in the project area and assesses environmental impacts that may be generated by implementing the proposed project. These project impacts are compared to “thresholds of significance” in order to determine the nature and severity of the direct and indirect impacts. Mitigation measures, intended to reduce adverse, significant impacts below threshold levels, are proposed where feasible. Impacts that cannot be eliminated or mitigated to less-than-significant levels are also identified.

5.0 **MTP Consistency with Other Plans Analysis**. Describes consistency with other local and regional plans.

6.0 **Other Statutory Considerations**. Identifies growth inducing impacts that may result from implementation of the proposed project, as well as long-term effects of the project and significant irreversible environmental changes.

7.0 **Alternatives**. Describes alternatives to the proposed project, and compares their impacts to the proposed projects.

8.0 **References and Preparers**. Lists all published materials, federal, State and local agencies and other organizations and individuals consulted during the preparation of this EIR. It also lists the EIR preparers.
The CEQA process for this EIR is as follows:

1. **Notice of Preparation (NOP) and Initial Study.** AMBAG, following CEQA Guidelines section 15082(a), submitted a NOP to the State Clearinghouse which publicly released it on December 21, 2015 for an extended review period that ended on January 29, 2016.

2. **Draft EIR Prepared.** The Draft EIR contains the following required elements: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.

3. **Notice of Completion (NOC) and Public Review.** AMBAG, as the lead agency, has filed an NOC with the State Clearinghouse noticing agencies and the public that it has completed a Draft EIR and prepared a Public Notice of Availability of this Draft EIR as required under CEQA. As the lead agency, AMBAG is soliciting input from other agencies and the public, and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The public review period will be a minimum of 45 days.

4. **Final EIR.** AMBAG will prepare a The Final EIR that includes: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.

5. **Certification of Final EIR.** Prior to making a decision on a proposed project, AMBAG will certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (CEQA Guidelines Section 15090).

6. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, AMBAG will find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency’s jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency’s decision. (CEQA Guidelines Section 15092).

7. **Mitigation Monitoring Reporting Program.** AMBAG will if AMBAG is required to make findings on significant effects identified in the EIR, it shall adopt a reporting or monitoring
8. Lead Agency Project Decision. AMBAG, as the lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if a statement of overriding considerations is adopted (CEQA Guidelines Sections 15092).

9. Notice of Determination (NOD). AMBAG will file a NOD after deciding to approve a project for which an EIR is prepared (CEQA Guidelines Section 15094). AMBAG will file the NOD with the applicable County Clerks to be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD will start 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Page 43 of the Draft EIR has been revised to include the following changes:

**Lead and Responsible Agencies**

The CEQA Guidelines define lead and responsible and trustee agencies. A lead agency is the public agency with principal responsibility for carrying out or approving a project; the lead agency prepares the CEQA document (CEQA Guidelines Section 15367). A responsible agency is an agency other than the lead agency with responsibility for carrying out or approving a project, and uses the lead agency’s CEQA document in its decision-making (CEQA Guidelines Section 15381).

AMBAG is the lead agency for the 2040 MTP/SCS because it holds principal responsibility for approving the 2040 MTP/SCS. TAMC, SBtCOG and SCCRTC, are responsible agencies for the 2040 MTP/SCS and lead agencies for adopting their own RTPs. AMBAG is also the lead agency, and TAMC, SBtCOG and SCCRTC are each responsible agencies, for the County RTP EIRs. Project sponsors for individual projects analyzed in this program EIR may include: TAMC, SBtCOG and SCCRTC; Caltrans; Monterey, San Benito and Santa Cruz Counties; cities within the AMBAG region; transit agencies; and other project sponsors who may implement any of the projects listed in the 2040 MTP/SCS. These agencies are considered responsible agencies for the 2040 MTP/SCS, but may be lead agencies for individual transportation or land use projects.

Page 52 of the Draft EIR has been revised to include the following changes:

The 2040 MTP/SCS plans how the AMBAG region will meet its transportation needs for the period from 2015 to 2040, considering existing and projected future land use patterns as well as forecast population and job growth. The 2040 MTP/SCS estimates approximately $9.27 billion in revenues expected to be available to the region from all transportation funding sources over the course of the planning period. It identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian; aviation, as well as transportation demand management measures (TDM) and transportation systems management (TSM).

Page 54 of the Draft EIR has been revised to include the following changes:

- **Appendices.** The appendices include the following:
One of the primary goals of the 2040 MTP/SCS is to reduce per capita greenhouse gas emissions over the next 25 years. A strategic transportation system expansion would provide the region with mobility and accessibility by targeting expansion around bus transit, rail, key roadways and active transportation. The 2040 MTP/SCS provides over $5.76 billion for highway, local streets and roads investments which include corridor improvements, roadway widenings and extensions, new roads and maintenance/repair. Another focus of the 2040 MTP/SCS is providing $3 billion for a long term public transit network that meets the regions mobility needs. The remaining transit funding is separated between maintenance and operation costs, as well as adding new transit vehicles and infrastructure. The 2040 MTP/SCS is focused on active transportation projects, which refers to bicycle and pedestrian facilities. Since one of the primary goals of the 2040 MTP/SCS is to reduce greenhouse gas emissions, active transportation plays a large role in reducing congestion, increasing health and overall quality of life. The 2040 MTP/SCS intends to make active transportation more attractive and feasible for all different users in the region, and the 2040 MTP/SCS has provided nearly $6403 million for active transportation projects. These investments and improvements include addition of bike lanes, roadway widenings and extensions, sidewalks and trails. These efforts are in direct accordance with the Complete Streets Act of 2008 (AB 1358). The 2040 MTP/SCS also considers airport improvements which would improve regional and state system capacity and safety.

The transportation network is crucial for the Central Coast as the network provides the access and means of travel for the agricultural products grown in the region. The health of all the major roads, highways and railways are vital to the success and safety of the region. Lastly, the 2040 MTP/SCS address transportation demand management (TDM) and traffic systems management (TSM) which intend to improve the efficiency and effectiveness of the network. The strategies employed by these management programs would reduce vehicular demand and congestion, which is directly in line with the goal of reducing greenhouse gas emissions. The 2040 MTP/SCS allocates nearly $42 million to TDM strategies which include vanpool and telecommuting. The 2040 MTP/SCS allocates more than $26 million to TSM projects and programs which include, but are not limited to, autonomous vehicles, shared vehicles, incident management, ramp metering and traffic signal synchronization.
The 2040 MTP/SCS transportation projects are further described in Section 2.4, below. A complete discussion of 2040 MTP/SCS transportation investments and plans is provided in Chapter 2 of the 2040 MTP/SCS.

The 2040 MTP/SCS includes Financially Constrained projects which identify the programs and projects proposed by RTPAs, local and county government, public transit operators and airport operators in the tri-County region for which funding will likely be available. These include a full range of programs and projects intended to improve roadway capacity/vehicular flow, enhance transit operations, improve safety, support transportation planning and travel demand management, promote high occupancy vehicle use, encourage active transportation travel and improve multimodal and intermodal facilities. Specifically, the 2040 MTP/SCS includes the following types of transportation system improvement projects:

- **Active Transportation Projects.** The 2040 MTP/SCS includes projects that would complete Class I bike trails, and Class II bike lanes and Class III bike routes, as well as sidewalk gap closures, trail access improvements, pedestrian bridges, bicycle and pedestrian treatments such as signal priority and amenities and related improvements to facilitate the use of transportation infrastructure by pedestrians and bicyclists such as traffic calming measures.

Page 58 and 59 of the Draft EIR have been revised to include the following changes:

The financial forecasts in the 2040 MTP/SCS are based on reasonably foreseeable revenues. The projections are calculated using a combination of historical averages, current trends and/or state and federal actions. Actual revenues will vary from year to year. The financial projections and estimation methods used in the 2040 MTP/SCS were developed collectively with transportation planning agencies in the Monterey Bay Area including AMBAG, TARC, SCCRTC, SBtCOG, Caltrans, Monterey-Salinas Transit (MST), the Santa Cruz County Metro Transit District, the three counties and 18 cities.

The Financial Plan identifies major federal, state and regional/local funding sources anticipated to be available during the life of the 2040 MTP/SCS. The majority of federal revenue is projected to come from the Urbanized Area Formulation Program, federal transit capital programs and miscellaneous federal highway revenue sources. State revenue sources include the State Highways Operation and Protection Program (SHOPP), State Transportation Improvement Program (STIP) and the Transportation Alternatives Program (TAP). Local revenue sources include the Transportation Development Act (TDA)/Local Transportation Fund (LTF), gas tax, transit fares and developer fees. In November 2016, TARC and SCCRTC passed local sales tax measures, Measure X and Measure D respectively, to fund transportation projects of all modes in their respected counties. This significant local investment in transportation will account for a stable funding source for local road maintenance, transit operations, active transportation investments and other congestion reducing projects. Together, these measures are expected to generate roughly $860 million over 22 years.

Total revenue is projected to be $9.97 billion. A complete discussion of the 2040 MTP/SCS financial plan is provided in Chapter 3 of the 2040 MTP/SCS.

Page 61 of the Draft EIR has been revised to include the following changes:

- **Active Transportation.** These projects are focused on improvements designed to benefit pedestrians and bicyclists. They include the construction of Class I-III bicycle lanes, sidewalk gap closures, ADA accessible ramps and sidewalks, pedestrian bridges, wideningshoulders,
maintenance, rehabilitation and repair projects, installation of traffic calming devices, roundabouts, new lighting and trail access. Within Monterey County, specific projects include the Fort Ord Regional Trail and Greenway (FORTAG), which would include approximately 30 miles of bike and pedestrian trails through the former Fort Ord; citywide intersection ADA upgrades in the City of Monterey; and sidewalk repairs at 6,000 locations. Within San Benito County, specific projects include construction of a portion of the San Benito River Recreational Trail and installation of bike lanes along Santa Ana Road, Buena Vista Road, North Street, Central Avenue, Airline Highway, Meridian Street and Sunnyslope Road. In Santa Cruz County, specific projects include several segments of the Monterey Bay Sanctuary Scenic Trail Network and installation of bicycle/pedestrian bridges over Branciforte Creek and Highway 1 at Mar Vista Drive. The Monterey Bay Sanctuary Scenic Trail (MBST) is planned to be a multiuse transportation, recreation and interpretive pathway that links existing and newly established trail segments into a continuous coastal trail around the Monterey Bay. The MBST Final Master Plan and Environmental Impact Report was adopted by SCCRTC in November 2013.

- **Highway Improvements.** These projects are generally focused on U.S. 101 and the state highway system throughout each of the three counties. They include the development of new infrastructure such as new interchanges, new and widened roadway lanes, ramp improvements, new overcrossings, roundabouts and other modifications designed to improve safety, traffic flow or and capacity. Specific projects in Monterey County include the State Routes (SR) 156 Corridor Widening Project, construction of a new interchange on U.S. 101 at Harris Road and construction of frontage roads along U.S. 101 in South County. In San Benito County, specific projects include a new interchange at U.S. 101 and SR 25 in Santa Clara County; the SR 25 Corridor Improvement Project; and construction of a four-lane expressway south of existing SR 156. Specific projects in Santa Cruz County include the construction of auxiliary lanes on Highway 1 from State Park Drive to Park Avenue, from Park Avenue to Bay Avenue/Porter Street, from 41st Avenue to Soquel Avenue and from San Andreas Road/Larkin Valley Road to Freedom Boulevard.

Page 62 of the Draft EIR has been revised to include the following changes:

- **Rail Projects.** The only regular rail passenger train currently operating in the region is provided by Amtrak, the Coast Starlight. It connects Los Angeles to Seattle and stops in Salinas, the only Amtrak rail station in the region. This route operates one train in each direction daily. In the future, Amtrak plans to expand service by offering the Coast Starlight service with stations in Soledad and King City. There is also bus service in the region for connections to the Capital Corridor route between San Jose and Sacramento. TAMS is working to extend the Capital Corridor commuter rail service to Salinas. In addition, SCCRTC is evaluating rail service and other uses on the Santa Cruz Branch Line as part of the Unified Corridor Investment Study.

- **Other Projects.** These projects are primarily focused on the construction of various improvements at public airports within the study area. These include the construction of a new terminal building, roads and surface parking at the Monterey Airport and taxiway lighting and signage improvements at the Marina Airport in Monterey County; operations and maintenance at the Hollister Airport in San Benito County; and new hangars and other improvements at the Watsonville Airport in Santa Cruz County. Other projects in San Benito County include COG planning and administration. Other projects in Santa Cruz County
**Transportation Demand Management.** Within Monterey County, these projects are focused on installation of Wireless Access in Vehicular Environments (WAVE) technology, ITS signal improvements and development/implementation of the Monterey Bay Area Cruz 511 Traveler Information, which includes both Monterey and Santa Cruz Counties and the Monterey and Rideshare/Commute Alternatives. Funds would cover the existing vanpool program within Monterey County and the commute solutions rideshare program in Santa Cruz County. TDM projects include a rideshare/commute alternatives program in Monterey County; rideshare and vanpool programs in San Benito County; and various vanpool, bicycling and commuter incentive programs designed to reduce VMT in Santa Cruz County.

Figure 3 on page 65 of the Draft EIR has been revised to include updated information.

Figure 6 on page 68 of the Draft EIR has been revised to include updated information.

Page 77 of the Draft EIR has been revised to include the following changes:

Monterey County covers approximately 2.1 million acres, of which approximately 1.3 million acres are in agricultural use (irrigated cropland, dry farming, grazing, animal husbandry and related agricultural services) (DOC, 2015). San Benito County covers approximately 890,000 acres, with approximately 670,000 acres in agricultural use (DOC, 2015). Santa Cruz County covers approximately 282,000 acres, with approximately 38,000 acres in agricultural use (DOC, 2015).

The AMBAG’s Draft 2018 Regional Growth Forecast (AMBAG, 2017d) estimates the population of each county within the tri-county region as of January 2015, as the following:

Page 80 of the Draft EIR has been revised to include the following changes:

Freight rail service, once operated by Southern Pacific Railroad, then by Union Pacific and now by Santa Cruz and Monterey Bay Railway (Iowa Pacific Holdings), has been a historically important form of transportation within Santa Cruz County. It is anticipated that Santa Cruz and Monterey Bay Railway will not be the rail service operator much longer and the RTC is currently negotiating with a potential replacement rail service operator. There are currently three rail lines in or adjacent to Santa Cruz County. The Santa Cruz Branch rail line extends from Watsonville Junction in Pajaro north to Davenport and passes through much of the county’s urban area. The Felton Branch rail line is owned and operated by the private Santa Cruz Big Trees & Pacific Railway Company and primarily provides summertime and holiday excursions between Felton and the Beach Boardwalk in Santa Cruz. The line is also occasionally used for freight. The Coast Rail Route is the Union Pacific main coastal line extending from San Jose to San Diego. A stop for the proposed Amtrak Coast Daylight service is planned at the Pajaro Station located at the Watsonville Junction.

Table 5 on page 102 of the Draft EIR has been revised to include the following changes:

<table>
<thead>
<tr>
<th>AMBAG ID</th>
<th>County</th>
<th>Locale</th>
<th>Project</th>
<th>Project Description/Scope</th>
<th>Potential Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMBAG ID</td>
<td>County</td>
<td>Locale</td>
<td>Project</td>
<td>Project Description/Scope</td>
<td>Impact</td>
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<td>------------------------------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>MON-GRN001-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>Apple Avenue Bridge over U.S. 101</td>
<td>Construct new bike/pedestrian bridge parallel to existing overpass.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-GRN005-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>Thorne Road Bridge over U.S. 101</td>
<td>Construct new bike/pedestrian bridge parallel to existing overpass.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MAR157-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>Reservation Road/Beach Road Improvements</td>
<td>Widen roadway with sidewalk and bike lane improvements.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MRY002-MY</td>
<td>Monterey</td>
<td>Monterey</td>
<td>Del Monte – Washington Improvements</td>
<td>Construct pedestrian bridge over Del Monte and traffic signal improvements.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MYC075-UM</td>
<td>Monterey</td>
<td>Chualar</td>
<td>River Road Operational Improvements</td>
<td>Widen shoulders and improve geometrics and install class II bike lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SCY009-SA</td>
<td>Monterey</td>
<td>Sand City</td>
<td>Bike Path Lighting</td>
<td>Install lighting on existing class I path.</td>
<td>AES-2</td>
</tr>
<tr>
<td>MON-SNS078-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Natividad Creek Bike Path</td>
<td>Install new bike path.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS141-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Laurel Drive Sidewalks</td>
<td>Sidewalk lighting.</td>
<td>AES-2</td>
</tr>
<tr>
<td>MON-SLO043-SO</td>
<td>Monterey</td>
<td>Soledad</td>
<td>Pedestrian Lighting</td>
<td>Construct pedestrian lighting along various City streets.</td>
<td>AES-2</td>
</tr>
<tr>
<td>MON-CT011-CT</td>
<td>Monterey</td>
<td>SR 68</td>
<td>SR 68 – Commuter Improvements</td>
<td>Widen existing roadway to 4 lanes between existing 4-lane segment at Toro Park and Corral de Tierra Road (MON-68-4.0/15.0)</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-CT017-CT</td>
<td>Monterey</td>
<td>SR 68</td>
<td>(Holman Hwy – access to Community Hospital)</td>
<td>Widen Holman Highway SR 68 from CHOMP to SR 1 to 4 lanes and make operational improvements at the SR 68/SR 1 EA interchange. (EA 05-44800) PM 3.8/L4.3</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-CT022-CT</td>
<td>Monterey</td>
<td>Prunedale</td>
<td>SR 156 – Corridor Widening Project</td>
<td>Construct new 4-lane highway south of existing alignment convert existing highway to frontage road and construct new at U.S. 156 and 101.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-CT030-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>U.S. 101 – Salinas Corridor</td>
<td>Widen U.S. 101 to 6 lanes within the existing right of way at locations where feasible.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-CT031-CT</td>
<td>Monterey</td>
<td>Chualar</td>
<td>U.S. 101 – South County Frontage Roads</td>
<td>Construct Frontage Roads from Harris Road to Chualar, then to Soledad. (EA 05-0H330)</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-CT045-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>U.S. 101 – Harris Road Interchange</td>
<td>Construct new interchange on U.S. 101 at Harris Road (PM 83.71).</td>
<td>AES-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
<td>County</td>
<td>Locale</td>
<td>Project</td>
<td>Project Description/Scope</td>
<td>Potential Impact</td>
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<tr>
<td>MON-GRN008-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>U.S. 101 – Walnut Avenue Interchange</td>
<td>Relocate and replace existing U.S. 101/Walnut Avenue Interchange and widen to six lanes. (EA 05-OP160) PM 53.4/54.3</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MAR136-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>SR 1 &amp; Imjin Bridge</td>
<td>Widen NB off-ramp to two lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MAR137-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>SR 1 &amp; Imjin Bridge</td>
<td>Widen SB on-ramp to two lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SOL002-SO</td>
<td>Monterey</td>
<td>Soledad</td>
<td>U.S. 101 – North Interchange</td>
<td>Install new interchange north of U.S. 101 and Front Street.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SOL003-SO</td>
<td>Monterey</td>
<td>Soledad</td>
<td>U.S. 101 – South Interchange</td>
<td>Install new interchange south of U.S. 101 and Front Street.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-PGV010-PG</td>
<td>Monterey</td>
<td>Pacific Grove</td>
<td>SR 6B – Bishop to Sunset</td>
<td>Mobility Improvements including sidewalks, lighting, landscaping and roadways overlay.</td>
<td>AES-2</td>
</tr>
<tr>
<td>MON-MAR001-MA</td>
<td>Monterey</td>
<td>Marina-Salinas</td>
<td>Marina – Salinas Corridor</td>
<td>Widen Davis Road to 4 lanes from Blanco Road to Reservation Road; construct new 4-lane bridge over the Salinas River; widen Reservation Road to 4 lanes from Davis Road to existing 4-lane section adjacent to East Garrison at Intergarrison Road; widen Imjin Pkwy to 4 lanes from Reservation Road to Imjin Road, construct new Imjin Parkway interchange at SR 1. Include accommodations for bicyclists, pedestrians and transit; consider high quality transit service along corridor.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS012-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Boronda Road Widening</td>
<td>Widen to 6 lanes from San Juan Grade Road to Williams Road; install Class II bike lanes and fill sidewalk gaps.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS044-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Natividad Road Widening</td>
<td>Widen from 2 to 4 lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS050-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Russel Road Widening</td>
<td>Widen street from U.S. 101 to San Juan Grade Road.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS059-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Williams Road Widening</td>
<td>Widen from 2 to 4 lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS090-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Russel Road Extension</td>
<td>Extend 4 lane arterial.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS092-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>San Juan Natividad Collector</td>
<td>Construct an east-west 2 lane collector.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS093-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Independence Boulevard Extension</td>
<td>Extend as 2 lane collector.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS094-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Hemingway Drive Extension</td>
<td>Construct 2-lane road.</td>
<td>AES-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
<td>County</td>
<td>Locale</td>
<td>Project</td>
<td>Project Description/Scope</td>
<td>Potential Impact</td>
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<tr>
<td>MON-SNS095-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Constitution Boulevard Extension</td>
<td>Construct 4-lane street.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS096-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Sanborn Road Extension</td>
<td>Construct 4-lane arterial.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS097-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Williams Russel Collector</td>
<td>Construct new north-south connection.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS-098-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Alisal Street Extension</td>
<td>Extend as 2-lane collector street with bike lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS099-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Moffett Street Extension</td>
<td>Extend as 4-lane collector.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS100-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Rossi Street Widening</td>
<td>Widen to 4 lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS101-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Bernal Drive Extension</td>
<td>Extend as 4-lane arterial.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS102-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Constitution Boulevard Extension</td>
<td>Construct new 2-lane street.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS103-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Williams Road Widening</td>
<td>Widen from 3 to 4 lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS104-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Alisal Street Widening</td>
<td>Widen from 2 to 4 lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS108-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Laurel Drive Widening</td>
<td>Widen to 6 lanes and add left turn channelization west of Constitution.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS121-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>McKinnon Street Extension</td>
<td>Extend 2-lane collector.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-FRA004-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>Patton Parkway (Abrams Road)</td>
<td>Construct a new 2-lane arterial and Class II bike lanes (FORA CIP FO2).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-FRA010-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>Crescent Court</td>
<td>Extend existing Crescent Court southerly to join proposed Abrams Drive on the former Fort Ord (FORA CIP off-site 8).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-FRA018-SE</td>
<td>Monterey</td>
<td>Seaside</td>
<td>Giggling Road</td>
<td>Upgrade/construct new 4-lane arterial (FORA CIP FO7).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-FRA023-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>Salinas Avenue</td>
<td>Construct new 2-lane arterial (FORA CIP FO11).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-FRA025-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>2nd Avenue Phase 2</td>
<td>Construct new arterial road and Class II bike lanes (FORA CIP FO8).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-FRA026-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>2nd Avenue Phase 3</td>
<td>Construct new arterial road and Class II bike lanes (FORA CIP FO8).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-FRA027-MA</td>
<td>Monterey</td>
<td>SR 68 Corridor</td>
<td>So. Boundary Road Improvements</td>
<td>Reconstruct street, add sidewalks, bike lanes, street lights, etc.</td>
<td>AES-1, AES-2</td>
</tr>
<tr>
<td>MON-GON005-GO</td>
<td>Monterey</td>
<td>Gonzales</td>
<td>Fanoe Road</td>
<td>Widen from 4 to 6 lanes and install Class II bike lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
<td>County</td>
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<td>Project</td>
<td>Project Description/Scope</td>
<td>Potential Impact</td>
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<tr>
<td>MON-GON007-GO</td>
<td>Monterey</td>
<td>Gonzales</td>
<td>La Gloria Road Widening</td>
<td>Widen road approximately one-half mile.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-GRN003-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>Oak Road Bridge over U.S. 101</td>
<td>Widen bridge for dual left turn lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-GRN022-B-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>Pine Avenue Overcrossing at U.S. 101</td>
<td>Construct new bridge over U.S. 101 to improve E-W traffic flow.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MAR150-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>2nd Avenue Extension</td>
<td>Construct new roadway.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MAR153-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>Patton (Abrams) Pkwy Extension</td>
<td>Measure X project to widen Imjin Parkway to 4 lanes from Reservation Road to Imjin Road.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MAR154-MA</td>
<td>Monterey</td>
<td>Marina</td>
<td>Imjin Parkway Widening Project</td>
<td>Shoulders widening &amp; geometric improvements and installation of 39.2 miles of Class II bikeway.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MYC043447-UM</td>
<td>Monterey</td>
<td>Unknown</td>
<td>Jolon Road Overlay Safety Improvements</td>
<td>Shoulder widening.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MYC147-UM</td>
<td>Monterey</td>
<td>Castroville</td>
<td>Castroville Improvements/ Blackie Road</td>
<td>Construct new road from Castroville Boulevard to Blackie Road.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MYC157-8-UM</td>
<td>Monterey</td>
<td>Carmel Valley</td>
<td>CVMP – Carmel Valley Road between Laureles Grade and Ford Shoulder Widening</td>
<td>Install signal or widen (prior to grade separation).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MYC162-UM</td>
<td>Monterey</td>
<td>Carmel Valley</td>
<td>CVMP – Laureles Grade at Carmel Valley Road Roundabout, Signalization, or Widening</td>
<td>Widen to four lanes between future Hwy 1 and Salinas Road interchange and existing four-lane section. Widen existing three-lane section of Salinas Road from Werner road to Elkhorn Road to four lanes. Add Class II bike lanes on Salinas Road from SR 1 to Elkhorn Road. Install traffic signal and construct intersection improvements at Salinas Road/Werner Road. Construct traffic signal on Elkhorn Road at Salinas Road. Re-align Salinas Road and Werner Road to intersect Elkhorn Road at a single location with a traffic signal.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MYC238-UM</td>
<td>Monterey</td>
<td>Moss Landing</td>
<td>Salinas Road Improvements</td>
<td>Widen to four lanes between future Hwy 1 and Salinas Road interchange and existing four-lane section. Widen existing three-lane section of Salinas Road from Werner road to Elkhorn Road to four lanes. Add Class II bike lanes on Salinas Road from SR 1 to Elkhorn Road. Install traffic signal and construct intersection improvements at Salinas Road/Werner Road. Construct traffic signal on Elkhorn Road at Salinas Road. Re-align Salinas Road and Werner Road to intersect Elkhorn Road at a single location with a traffic signal.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-MYC247-UM</td>
<td>Monterey</td>
<td>Prunedale</td>
<td>San Miguel Canyon Road at Castroville Boulevard</td>
<td>Signalization of the intersection, roadway widening and striping improvements.</td>
<td>AES-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
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<td>Project</td>
<td>Project Description/Scope</td>
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<tr>
<td>MON-SCY005-SA</td>
<td>Monterey</td>
<td>Sand City</td>
<td>Sand City Rehab in Old Town Area</td>
<td>Install street lighting, reconstruct streets in Old Town area; design shared streets (Woonerfs).</td>
<td>AES-2</td>
</tr>
<tr>
<td>MON-SNS006-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>U.S. 101 – Alvin Drive Overpass/Underpass and Bypass</td>
<td>Construct overpass/underpass and 4-lane street structure.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS008-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Bernal Drive East Improvements</td>
<td>Widen road, construct sidewalk and retaining wall on north side of road; between N. Main and Rosarita Drive.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS024-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Elvee Drive</td>
<td>Construct 44’ wide culvert and extend two lanes between Work to Elvee.</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS041-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Marval Drive Reconstruction</td>
<td>Widen roadway behind Rodeo Grounds (from 36’ to 40’).</td>
<td>AES-1</td>
</tr>
<tr>
<td>MON-SNS159-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Market/ Eucalyptus Intersection Improvements</td>
<td>Traffic signal installation, lighting and sidewalks.</td>
<td>AES-2</td>
</tr>
<tr>
<td>SB-COG-A54</td>
<td>San Benito</td>
<td>Hollister-Gilroy</td>
<td>State Route 25 Corridor Improvement Project</td>
<td>To enhance safety, improve traffic operations and provide additional capacity to reduce congestion for all transportation modes on Highway 25 between San Felipe Road and the San Benito/Santa Clara County line.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-CT-A01</td>
<td>San Benito</td>
<td>San Juan Bautista</td>
<td>SR 156 Widening – San Juan Bautista to Union Road</td>
<td>Construct a four-lane expressway south of the existing State Route 156 and use the existing SR 156 as the northern frontage road.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-CT-A17</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Airline Highway Widening/SR 25 Widening: Sunset Drive to Fairview Road</td>
<td>Widen to 4-lane expressway with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-CT-A44</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Highway 25 4-lane Widening, Phase 1</td>
<td>Widen to 4-lane expressway, San Felipe Road to Hudner Lane.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-VTA-A01</td>
<td>San Benito</td>
<td>Gilroy</td>
<td>Highway 101/25 Interchange</td>
<td>New interchange at Highway 101 and Highway 25 in Santa Clara County.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-CT-A02</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Highway 156/Fairview Road Intersection Improvements</td>
<td>Construct new turn lanes at the intersection.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-COH-A16</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Memorial Drive Extension: Meridian Street to Santa Ana Road</td>
<td>Construct 4-lane road extension with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
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<tr>
<td>SB-COH-A18</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Westside Boulevard Extension</td>
<td>Construct 2-lane road; Nash Road to Southside Road/San Benito Street intersection with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-COH-A19</td>
<td>San Benito</td>
<td>Hollister</td>
<td>North Street (Buena Vista) between College Street and San Benito Street</td>
<td>Construct 2-lane road with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-COH-A55</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Memorial Drive North Extension: Santa Ana Road to Flynn Road/Shelton Intersection</td>
<td>Construct new 4-lane road and extension with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-COH-A57</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Pacific Way (New Road): San Felipe Rd. to Memorial Drive</td>
<td>New 2-lane road from San Felipe Road to future Memorial Drive north extension with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A04</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Union Road Widening (East): San Benito Street to Highway 25</td>
<td>Widen to 4-lane arterial with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A05</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Union Road Widening (West): San Benito Street to Highway 156</td>
<td>Widen to 4-lane arterial with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A09</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Fairview Road Widening: McCloskey to SR 25</td>
<td>Widen to 4-lane arterial; construct new bridge south of Santa Ana Valley Road with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A14</td>
<td>San Benito</td>
<td>Hollister</td>
<td>San Benito Regional Park Access Road</td>
<td>Construct new 2-lane roadway from Nash Road to San Benito Street</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A50</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Hospital Road Bridge</td>
<td>Hospital Road over San Benito River, between South Side Road and Cienega Road. Replace lane low water crossing with 2-lane bridge. Bridge No. 00L0026</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A67</td>
<td>San Benito</td>
<td>Dunneville</td>
<td>Shore Road Extension</td>
<td>4-lane arterial with Class II bike lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A79</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Enterprise Road Extension</td>
<td>Extend Enterprise Road westerly from Southside Road toward Union Road.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A81</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Meridian Street Extension: 185 feet east of Clearview Road to Fairview Road</td>
<td>Construct 4-lane road. Located in the City of Hollister and County with bicycle lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A82</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Flynn Road Extension</td>
<td>San Felipe Road to Memorial Drive north extension. New roadway construction south of McCloskey Road with bicycle lanes.</td>
<td>AES-1</td>
</tr>
</tbody>
</table>
### Project Descriptions:

<table>
<thead>
<tr>
<th>AMBAG ID</th>
<th>County</th>
<th>Locale</th>
<th>Project</th>
<th>Project Description/Scope</th>
<th>Impact</th>
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</thead>
<tbody>
<tr>
<td>SB-SJB-A07</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Third Street Extension</td>
<td>Constructing Third Street to connect to First Street.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SJB-A08</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Lavanigno Drive Construction</td>
<td>Construction of Lavanigno Drive, split lanes with island in the middle; total 4 lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SJB-A09</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Connect Lang Street to The Alameda</td>
<td>Construct and connect Lang Street; 2 lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A51</td>
<td>San Benito</td>
<td>Unknown</td>
<td>Y Road Bridge</td>
<td>Y Road over San Benito River replace 2-lane Low-Water Crossing with 2-lane bridge. Bridge No. 00L0069</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A54</td>
<td>San Benito</td>
<td>Near Paicines</td>
<td>Panoche Road Bridge (Bridge No. 43C0027)</td>
<td>Panoche Road, over Tres Pinos Creek, 12 miles west Little Panoche Road. Replace 1-lane bridge with 2-lane bridge. Bridge No. 43C0027</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A57</td>
<td>San Benito</td>
<td>Cienega Valley</td>
<td>Limekiln Road Bridge</td>
<td>Limekiln Rd over Pescadero Creek, 0.1 mi. S Cienega Rd. Replace 1-lane bridge with 2-lane bridge. Bridge No. 43C0054.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-SBC-A58</td>
<td>San Benito</td>
<td>San Juan Bautista</td>
<td>Rocks Road Bridge</td>
<td>Rocks Road over Pinacate Rock Creek, East Little Merrill Road. Replace 1-lane bridge with 2-lane bridge. Bridge No. 43C0053.</td>
<td>AES-1</td>
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<tr>
<td>SB-SBC-A86</td>
<td>San Benito</td>
<td>Hollister</td>
<td>John Smith Realignment at Fairview Intersection</td>
<td>This project will realign John Smith Road to intersect Fairview Road at St. Benedict Way and add left and right turn lanes into John Smith Road.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SB-LTA-A5348</td>
<td>San Benito</td>
<td>Hollister-Gilroy</td>
<td>Commuter Rail to Santa Clara County</td>
<td>Commuter rail from Hollister to Gilroy.</td>
<td>AES-1</td>
</tr>
<tr>
<td>RTC 305C</td>
<td>Santa Cruz</td>
<td>Aptos</td>
<td>Hwy 1 Bicycle/Ped Overcrossing at Mar Vista</td>
<td>Construct a bicycle/pedestrian overcrossing of Hwy 1 in vicinity of Mar Vista Drive, providing improved access to Seacliff and Aptos neighborhoods and schools.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SC-SC-P105-SCR</td>
<td>Santa Cruz</td>
<td>Santa Cruz</td>
<td>Market Street sidewalks and Bike Lanes</td>
<td>Completion of sidewalks and bicycle lanes. Includes retaining walls, right-of-way, tree removals and a bridge modification.</td>
<td>AES-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
<td>County</td>
<td>Locale</td>
<td>Project</td>
<td>Project Description/Scope</td>
<td>Potential Impact</td>
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</tr>
<tr>
<td>SC-WAT-P6S-WAT</td>
<td>Santa Cruz</td>
<td>Watsonville</td>
<td>Upper Struve Slough Trail</td>
<td>Construction of 450 foot long pedestrian/bicycle path along upper Struve Slough from Green Valley Road to Pennsylvania Drive. The trail shall consist of a twelve-foot wide by one foot deep aggregate base section with the center eight feet covered with a chip seal. Additional improvements include installing a 130-foot length of modular concrete block retaining wall, reinforcing 160-foot length of slough embankment with rock slope protection and installing a 175-foot long by eight foot wide boardwalk.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SC-RTC-24e-RTC</td>
<td>Santa Cruz</td>
<td>Soquel</td>
<td>3 - Hwy 1: Auxiliary Lanes from State Park Drive to Park Avenue and from Park Avenue to Bay Avenue/Porter Street</td>
<td>Construct approximately 2.5 miles of auxiliary lanes northbound and southbound between State Park Drive and Park Avenue interchange and the Park Avenue and Bay/Porter interchange. Includes retaining walls, soundwalls and reconstruction of Capitola Avenue overcrossing with wider sidewalks and bike lanes. [Part of Highway 1 CIP project (RTC 24a)]. Construct auxiliary lanes and reconstruct Capitola Avenue overcrossing.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SC-RTC-24f-RTC</td>
<td>Santa Cruz</td>
<td>Soquel</td>
<td>2 – Hwy 1: Auxiliary Lanes from 41st Avenue to Soquel Avenue and Chanticleer Bike/Ped Bridge</td>
<td>Construct auxiliary lanes and a bicycle/pedestrian overcrossing of Hwy 1 at Chanticleer Avenue.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SC-RTC-24g-RTC</td>
<td>Santa Cruz</td>
<td>Soquel</td>
<td>4 – Hwy 1: Auxiliary Lanes from State Park Drive to Park Avenue</td>
<td>Construct auxiliary lanes.</td>
<td>AES-1</td>
</tr>
<tr>
<td>SC-RTC 24r-RTC</td>
<td>Santa Cruz</td>
<td>Aptos</td>
<td>9a – Hwy 1: Northbound Auxiliary Lane from San Andreas Road/Larkin Valley Road to Freedom Boulevard</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Association of Monterey Bay Area Governments**

**2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties**

Final Environmental Impact Report  F-127
### Table 7 on page 123 of the Draft EIR has been revised to include the following changes:

<table>
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<tbody>
<tr>
<td>MON-GRN001-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>Apple Avenue Bridge over U.S. 101</td>
<td>Construct new bike/pedestrian bridge parallel to existing overpass.</td>
<td>AG-1</td>
</tr>
</tbody>
</table>

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### Table 7 2040 MTP/SCS Projects That May Result in Agriculture and Forestry Impacts

<table>
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<tr>
<th>AMBAG ID</th>
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<td>MON-GRN001-GR</td>
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<td>Greenfield</td>
<td>Apple Avenue Bridge over U.S. 101</td>
<td>Construct new bike/pedestrian bridge parallel to existing overpass.</td>
<td>AG-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
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<td>Locale</td>
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<tr>
<td>MON-GRN005-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>Thorne Road Bridge over U.S. 101</td>
<td>Construct new bike/pedestrian bridge parallel to existing overpass.</td>
<td>AG-1</td>
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<tr>
<td>MON-MYC075-UM</td>
<td>Monterey</td>
<td>Chualar</td>
<td>River Road Operational Improvements</td>
<td>Widen shoulders and improve geometrics and install class II bike lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-SNS078-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Natividad Creek Bike Path</td>
<td>Install new bike path.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-CT030-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>U.S. 101 – Salinas Corridor</td>
<td>Widen U.S. 101 to 6 lanes within the existing right of way at locations where feasible.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-CT031-CT</td>
<td>Monterey</td>
<td>Chualar</td>
<td>U.S. 101 – South County Frontage Roads</td>
<td>Construct Frontage Roads from Harris Road to Chualar, then to Soledad. (EA 05-OH330)</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-CT0445-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>U.S. 101 – Harris Road Interchange</td>
<td>Construct new interchange on U.S. 101 at Harris Road (PM 83.71).</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-GRN008-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>U.S. 101 – Walnut Avenue Interchange</td>
<td>Relocate and replace existing U.S. 101/Walnut Avenue Interchange and widen to six lanes. (EA 05-OP160) PM 53.4/54.3</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-SOL002-SO</td>
<td>Monterey</td>
<td>Soledad</td>
<td>U.S. 101 – North Interchange</td>
<td>Install new interchange north of U.S. 101 and Front Street.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-SOL003-SO</td>
<td>Monterey</td>
<td>Soledad</td>
<td>U.S. 101 – South Interchange</td>
<td>Install new interchange south of U.S. 101 and Front Street.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-MAR001-MA</td>
<td>Monterey</td>
<td>Marina-Salinas</td>
<td>Marina – Salinas Corridor</td>
<td>Widen Davis Road to 4 lanes from Blanco Road to Reservation Road; construct new 4-lane bridge over the Salinas River; widen Reservation Road to 4 lanes from Davis Road to existing 4-lane section adjacent to East Garrison at Intergarrison Road; widen Imjin Pkwy to 4 lanes from Reservation Road to Imjin Road, construct new Imjin Parkway interchange at SR 1. Include accommodations for bicyclists, pedestrians and transit; consider high quality transit service along corridor.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-SNS012-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Boronda Road Widening</td>
<td>Widen to 6 lanes from San Juan Grade Road to Williams Road; install Class II bike lanes and fill sidewalk gaps.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-SNS037-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Main Street (North) Widening</td>
<td>Widen to 6 lanes from Market to Casentini including bicycle and pedestrian improvements.</td>
<td>AG-1</td>
</tr>
<tr>
<td>MON-SNS044-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Natividad Road Widening</td>
<td>Widen from 2 to 4 lanes.</td>
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<tr>
<td>MON-SNS050-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Russel Road Widening</td>
<td>Widen street from U.S. 101 to San Juan Grade Road.</td>
<td>AG-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
<td>County</td>
<td>Locale</td>
<td>Project</td>
<td>Project Description/Scope</td>
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<tr>
<td>MON-SNS059-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Williams Road</td>
<td>Widen from 2 to 4 lanes.</td>
<td>AG-1</td>
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<tr>
<td></td>
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<td></td>
<td>Widening</td>
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<td>MON-SNS090-SL</td>
<td>Monterey</td>
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<td>Russel Road</td>
<td>Extend 4 lane arterial.</td>
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<tr>
<td>MON-SNS092-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>San Juan Natividad</td>
<td>Construct an east-west 2 lane collector.</td>
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<tr>
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<tr>
<td>MON-SNS093-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Independence Boulevard</td>
<td>Extend as 2 lane collector.</td>
<td>AG-1</td>
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<tr>
<td>MON-SNS094-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Hemingway Drive</td>
<td>Construct 2-lane road.</td>
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<td>MON-SNS095-SL</td>
<td>Monterey</td>
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<td>Constitution Boulevard</td>
<td>Construct 4-lane street.</td>
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<td>MON-SNS096-SL</td>
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<td>Sanborn Road</td>
<td>Construct 4-lane arterial.</td>
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<td>MON-SNS097-SL</td>
<td>Monterey</td>
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<td>Williams Russel</td>
<td>Construct new north-south connection.</td>
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<td>MON-SNS-098-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Alisal Street</td>
<td>Extend as 2-lane collector street with bike lanes.</td>
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<td>MON-SNS099-SL</td>
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<td>Moffett Street</td>
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<td>MON-SNS100-SL</td>
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<td>Rossi Street</td>
<td>Widen to 4 lanes.</td>
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<td>MON-SNS101-SL</td>
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<td>Salinas</td>
<td>Bernal Street</td>
<td>Extend as 4-lane arterial.</td>
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<td>MON-SNS102-SL</td>
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<td>Salinas</td>
<td>Constitution Boulevard</td>
<td>Construct new 2-lane street.</td>
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<tr>
<td>MON-SNS103-SL</td>
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<td>Salinas</td>
<td>Williams Road</td>
<td>Widen from 3 to 4 lanes.</td>
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<td>Widening</td>
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<tr>
<td>MON-SNS104-SL</td>
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<td>Salinas</td>
<td>Alisal Street</td>
<td>Widen from 2 to 4 lanes.</td>
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<tr>
<td>MON-SNS108-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Laurel Drive</td>
<td>Widen to 6 lanes and add left turn channelization west of Constitution.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Widening</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MON-SNS121-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>McKinnon Street</td>
<td>Extend 2-lane collector.</td>
<td>AG-1</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Extension</td>
<td></td>
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</tr>
<tr>
<td>MON-GON005-GO</td>
<td>Monterey</td>
<td>Gonzales</td>
<td>Fanoe Road</td>
<td>Widen from 4 to 6 lanes and install Class II bike lanes.</td>
<td>AG-1</td>
</tr>
<tr>
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<tr>
<td>MON-GON007-GO</td>
<td>Monterey</td>
<td>Gonzales</td>
<td>La Gloria Road</td>
<td>Widen road approximately one-half mile.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
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<td>Widening</td>
<td></td>
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</tr>
<tr>
<td>MON-GRN022B-GR</td>
<td>Monterey</td>
<td>Greenfield</td>
<td>Pine Avenue</td>
<td>Construct new bridge over U.S. 101 to improve E-W traffic flow.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Overcrossing at U.S. 101</td>
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<td></td>
</tr>
<tr>
<td>MON-MYC043147-UM</td>
<td>Monterey</td>
<td>Unknown</td>
<td>Jolon Road</td>
<td>Shoulder widening &amp; geometric improvements and installation of 39.2 miles of Class II bikeway.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Overlay Safety</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
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<td>Improvements</td>
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<tbody>
<tr>
<td>MON-MYC147-UM</td>
<td>Monterey</td>
<td>Castroville</td>
<td>Castroville</td>
<td>Construct new road from Castroville Boulevard to Blackie Road.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Improvements/Blac</td>
<td>kie Road</td>
<td></td>
</tr>
<tr>
<td>MON-MYC238-UM</td>
<td>Monterey</td>
<td>Moss Landing</td>
<td>Salinas Road</td>
<td>Widen to four lanes between future Hwy 1 and Salinas Road interchange and existing four-</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Improvements</td>
<td>lane section. Widen existing three-lane section of Salinas Road from Werner road to</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Elkhorn Road to four lanes. Add Class II bike lanes on Salinas Road from SR 1 to Elkhorn</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Road. Install traffic signal and construct intersection improvements at Salinas Road/</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Werner Road. Construct traffic signal on Elkhorn Road at Salinas Road. Re-align Salinas</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Road and Werner Road to intersect Elkhorn Road at a single location with a traffic</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>signal.</td>
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</tr>
<tr>
<td>MON-SNS008-SL</td>
<td>Monterey</td>
<td>Salinas</td>
<td>Bernal Drive East</td>
<td>Widen road, construct sidewalk and retaining wall on north side of road; between N. Main</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Improvements</td>
<td>and Rosarita Drive.</td>
<td></td>
</tr>
<tr>
<td>SB-COG-A54</td>
<td>San Benito</td>
<td>Hollister -</td>
<td>State Route 25</td>
<td>To enhance safety, improve traffic operations and provide additional capacity to reduce</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gilroy</td>
<td>Corridor Improvement Project</td>
<td>congestion for all transportation modes on Highway 25 between San Felipe Road and the San</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Benito/Santa Clara County line.</td>
<td></td>
</tr>
<tr>
<td>SB-CT-A01</td>
<td>San Benito</td>
<td>San Juan</td>
<td>SR 156 Widening –</td>
<td>Construct a four-lane expressway south of the existing State Route 156 and use the</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bautista</td>
<td>San Juan Bautista</td>
<td>existing SR 156 as the northern frontage road.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>to Union Road</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB-CT-A17</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Airline Highway</td>
<td>Widen to 4-lane expressway with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Widening/SR 25</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Widening: Sunset</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Drive to Fairview</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Road</td>
<td></td>
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<tr>
<td>SB-CT-A44</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Highway 25 4-lane</td>
<td>Widen to 4-lane expressway, San Felipe Road to Hudner Lane.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Widening, Phase 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB-VTA-A01</td>
<td>San Benito</td>
<td>Gilroy</td>
<td>Highway 101/25 Interchange</td>
<td>New interchange at Highway 101 and Highway 25 in Santa Clara County.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-CT-A02</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Highway 156/Fairview Road</td>
<td>Construct new turn lanes at the intersection.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Intersection Improvements</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB-COH-A16</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Memorial Drive Extension: Meridian</td>
<td>Construct 4-lane road extension with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Street to Santa Ana Road</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AMBAG ID</td>
<td>County</td>
<td>Locale</td>
<td>Project</td>
<td>Project Description/Scope</td>
<td>Impact</td>
</tr>
<tr>
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<td>------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>SB-COH-A18</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Westside Boulevard Extension</td>
<td>Construct 2-lane road; Nash Road to Southside Road/San Benito Street intersection with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-COH-A19</td>
<td>San Benito</td>
<td>Hollister</td>
<td>North Street (Buena Vista) between College Street and San Benito Street</td>
<td>Construct 2-lane road with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-COH-A55</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Memorial Drive North Extension: Santa Ana Road to Flynn Road/Shelton Intersection</td>
<td>Construct new 4-lane road and extension with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-COH-A57</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Pacific Way (New Road): San Felipe Road to future Memorial Drive north extension</td>
<td>New 2-lane road from San Felipe Road to future Memorial Drive north extension with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A04</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Union Road Widening (East): San Benito Street to Highway 25</td>
<td>Widen to 4-lane arterial with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A05</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Union Road Widening (West): San Benito Street to Highway 156</td>
<td>Widen to 4-lane arterial with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A09</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Fairview Road Widening: McCloskey to SR 25</td>
<td>Widen to 4-lane arterial; construct new bridge south of Santa Ana Valley Road with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A14</td>
<td>San Benito</td>
<td>Hollister</td>
<td>San Benito Regional Park Access Road</td>
<td>Construct new 2-lane roadway from Nash Road to San Benito Street</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A67</td>
<td>San Benito</td>
<td>Dunneville</td>
<td>Shore Road Extension</td>
<td>4-lane arterial with Class II bike lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A79</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Enterprise Road Extension</td>
<td>Extend Enterprise Road westerly from Southside Road toward Union Road.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A81</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Meridian Street Extension: 185 feet east of Clearview Road to Fairview Road</td>
<td>Construct 4-lane road. Located in the City of Hollister and County with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A82</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Flynn Road Extension</td>
<td>San Felipe Road to Memorial Drive north extension. New roadway construction south of McCloskey Road with bicycle lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SJB-A08</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Lavanigno Drive Construction</td>
<td>Construction of Lavanigno Drive, split lanes with island in the middle; total 4 lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>AMBAG ID</td>
<td>County</td>
<td>Locale</td>
<td>Project</td>
<td>Project Description/Scope</td>
<td>Potential Impact</td>
</tr>
<tr>
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</tr>
<tr>
<td>SB-SIB-A09</td>
<td>San Benito</td>
<td>Hollister</td>
<td>Connect Lang Street to The Alameda</td>
<td>Construct and connect Lang Street; 2 lanes.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A57</td>
<td>San Benito</td>
<td>Cienega Valley</td>
<td>Limekiln Road Bridge</td>
<td>Limekiln Rd over Pescadero Creek, 0.1 Mi S Cienega Road. Replace 1-lane bridge with 2-lane bridge. Bridge No. 43C0054.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-SBC-A86</td>
<td>San Benito</td>
<td>Hollister</td>
<td>John Smith Realignment at Fairview Intersection</td>
<td>This project will realign John Smith Road to intersect Fairview Road at St. Benedict Way and add left and right turn lanes into John Smith Road.</td>
<td>AG-1</td>
</tr>
<tr>
<td>SB-LTA-A5348</td>
<td>San Benito</td>
<td>Hollister-Gilroy</td>
<td>Commuter Rail to Santa Clara County</td>
<td>Commuter rail from Hollister to Gilroy.</td>
<td>AG-1</td>
</tr>
</tbody>
</table>

Page 147 of the Draft EIR has been revised to include the following changes:

Air emissions from on-road mobile sources were calculated using emission factors from CARB’s EMFAC 2014 model and regional vehicle miles travelled (VMT) from AMBAG’s Regional Travel Demand Model (RTDM). EMFAC emission factors are established by CARB and accommodate mobility assumptions (e.g., vehicle fleets, speed, delay times, average trip lengths, time of day and total travel time) provided by AMBAG’s RTDM, which include socioeconomic growth projections based on AMBAG’s Draft 2018 Regional Growth Forecast (refer to “Modeling Methodology” in Appendix F to the 2040 MTP/SCS). The long-term emissions analysis uses 2015 emissions as a baseline because this is the most recent year for which accurate regionwide VMT data is available (as of the publishing of the NOP on December 21, 2015). Projected vehicle emissions on the AMBAG transportation network for the year 2040 under the 2040 MTP/SCS were compared with 2015 existing conditions. Future conditions under the ‘no project’ scenario were provided for informational purposes.

Page 148 of the Draft EIR has been revised to include the following changes:

Conflicts or obstructions with the applicable air quality plan are typically determined by consistency with the population forecast or emissions forecast. The most recent air quality plan is MBARD’s 2012-2015 AQMP, which is based on AMBAG’s 2014 Regional Growth Forecast and includes socioeconomic assumptions for population, housing and employment. The 2040 MTP/SCS is based on the Draft 2018 Regional Growth Forecast, which includes new data and analysis of the current economy to provide a more accurate assessment of future growth, including updated population forecasts that are lower by 18,000-27,400 depending on the horizon year than the 2014 Regional Growth Forecast (i.e., for 2020 the Draft 2018 Regional Growth Forecast population forecast is 18,000 less than the 2014 Regional Growth Forecast, and for 2035 the Draft 2018 Regional Growth Forecast population forecast is 27,400 less than the 2014 Regional Growth Forecast). Differences in socioeconomic assumptions and forecast horizons are attributed to updated data providing more accurate assumptions for the post-recession economy and socioeconomic conditions in the region. These differences do not represent a significant impact regarding plan inconsistency, and the population forecast for the 2040 MTP/SCS is within the forecast on which the 2012-2015 AQMP is based.
Mitigation Measures

For transportation projects under their jurisdiction, TAMS, SBTCOG and SCCRTC shall implement and transportation project sponsor agencies can and should implement, the following mitigation measures developed for the 2040 MTP/SCS program where applicable for transportation projects. Cities and counties in the AMBAG region can and should implement these measures, where relevant to land use projects implementing the 2040 MTP/SCS. Project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.

AQ-4 Health Risk Reduction Measures

Transportation implementing agencies shall implement the following measures:

- During project-specific design and CEQA review, the potential localized particulate (PM$_{10}$ and PM$_{2.5}$) impacts and their health risks shall be evaluated for the project using procedures and guidelines consistent with U.S. EPA 2015’s Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM$_{2.5}$ and PM$_{10}$ Nonattainment and Maintenance Areas. If required based on the project-level hotspot analysis, project-specific mitigation shall be added to the project design concept or scope to ensure that local particulate (PM$_{10}$ and PM$_{2.5}$) emissions would not reach a concentration at any location that would cause estimated cancer risk to exceed the 2015 Office of Environmental Health Hazard Assessment (OEHHA) threshold of 10 in one million. Per the U.S. EPA guidance (2015), potential mitigation measures to be considered may include but shall not be limited to: providing a retrofit program for older higher emitting vehicles, anti-idling requirements or policies, controlling fugitive dust, routing traffic away from populated zones and replacing older buses with cleaner buses. These measures can and should be implemented to reduce localized particulate impacts as needed.

- Retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with CARB and OEHHA requirements to determine the exposure of nearby residents to TAC concentrations.

Page 160 of the Draft EIR has been revised to include the following changes:

<table>
<thead>
<tr>
<th>AMBAG Project No.</th>
<th>Projects</th>
<th>Location</th>
<th>Impact</th>
<th>Description of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>MON-CT044-SL</td>
<td>U.S. 101 – Harris Road Interchange</td>
<td>Monterey County</td>
<td>AQ-2, AQ-3,</td>
<td>Potential impacts from construction equipment grading, dust, vehicle emissions</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>AQ-4, AQ-5</td>
<td></td>
</tr>
<tr>
<td>MON-CT031-CT</td>
<td>U.S. 101 – South County Frontage Roads</td>
<td>Monterey County</td>
<td>AQ-2, AQ-3,</td>
<td>Potential impacts from construction equipment grading, dust, vehicle emissions</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>AQ-4, AQ-5</td>
<td></td>
</tr>
<tr>
<td>MON-CT030-SL</td>
<td>U.S. 101 – Salinas Corridor</td>
<td>Monterey County</td>
<td>AQ-2, AQ-3,</td>
<td>Potential impacts from construction equipment grading, dust, vehicle emissions</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>AQ-4, AQ-5</td>
<td></td>
</tr>
</tbody>
</table>
**AMBAG Project No.**  | **Projects** | **Location** | **Impact** | **Description of Impact**  
--- | --- | --- | --- | ---  
SC-AIR-P01-WAT | Lump Sum Watsonville Municipal Airport Capital Projects | Santa Cruz County | AQ-2, AQ-3, AQ-4, AQ-5 | Potential impacts from construction equipment grading, dust, vehicle emissions  
SC-RTC-24e-RTC | 3 - Hwy 1: Auxiliary Lanes from State Park Drive to Park Avenue and from Park Avenue to Bay Avenue/Porter Street Highway 1 - Auxiliary Lanes from Park Avenue to Bay Avenue/Porter Street | Santa Cruz County | AQ-2, AQ-3, AQ-4, AQ-5 | Potential impacts from construction equipment grading, dust, vehicle emissions  
SC-SC-P81-SCR | Highway 1/Mission Street at Chestnut/King/Union Intersection Modification | Santa Cruz County | AQ-2, AQ-3, AQ-4, AQ-5 | Potential impacts from construction equipment grading, dust, vehicle emissions  

Figure 23 on page 181 of the Draft EIR has been revised to show information pertaining to critical habitat in Santa Cruz County.

Page 185 of the Draft EIR has been revised to include the following changes:

*Clean Water Act*

Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers (USACE), with EPA oversight, has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other “waters of the United States.” Perennial and intermittent creeks are considered waters of the United States if they are hydrologically connected to other jurisdictional waters. In achieving the goals of the Clean Water Act, the USACE seeks to avoid adverse impacts and offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional “waters of the United States” would require a Section 404 permit from the USACE prior to the start of work. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetlands is met by compensatory mitigation; in general, the type and location options for compensatory mitigation should comply with the hierarchy established by the USACE Corp/EPA 2008 Mitigation Rule (in descending order): (1) mitigation banks; (2) in-lieu fee programs; and (3) permittee-responsible compensatory mitigation. Also, in accordance with Section 401 of the Clean Water Act, applicants for a Section 404 permit must obtain water quality certification from the appropriate RWQCB.

Page 207 of the Draft EIR has been revised to include the following changes:

The Monterey Coast was first visited by Europeans in 1602 by Sebastian Vizcaíno (Bean 1968). The Spanish presidio and mission, which was later moved to Carmel, were established by Captain Gaspar de Portolá in Monterey in 1770, and served as the capital of the California missions until 1803 (Bean 1968: 40; Johnson 1979:83). Mission San Antonio de Padua, in southern Monterey County, was founded in 1791. Missions Santa Cruz, located in the current city of Santa Cruz and Nuestra Señora de la Soledad, in central Monterey County, were founded.
in 1791. Mission San Juan Bautista, in northwestern San Benito County, was founded in 1797 (Bean 1968: 45).

Pages 214 and 215 of the Draft EIR have been revised to include the following changes:

**The Department of Transportation Act**

Passed in 1966, the Department of Transportation Act (49 USC 303, formerly 49 USC 1651(b)(2) and 49 USC 1653f) includes Section 4(f), which states that the Federal Highway Administration (FHWA) and other US Department of Transportation (USDOT) agencies cannot approve the use of land from public and private historical sites unless certain conditions apply. These conditions are the following: If there is no feasible and prudent avoidance alternative to the use of land, and if the action includes all possible planning to minimize harm to the property resulting from such use; or if FHWA The Administration determines that the use of the property will have a de minimis impact.

Page 217 of the Draft EIR has been revised to include the following changes:

**Human Burials**

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in Section 5097 of the California Public Resources Code. The California Health and Safety Code (Sections 7050.5, 7051 and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protects them from disturbance, vandalism, or destruction and established procedures to be implemented if Native American skeletal remains are discovered. Public Resources Code §5097.98 also addresses the disposition of Native American burials, protects such remains and established the Native American Heritage Commission (NAHC) to resolve any related disputes.

Table 22, on pages 228 and 229 of the Draft EIR has been revised to include the following changes:

**Table 22  MTP Projects that May Result in Cultural Resource Impacts**

<table>
<thead>
<tr>
<th>AMBAG Project No.</th>
<th>Project</th>
<th>Location</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>MON-CT022-CT</td>
<td>SR 156 – Corridor Widening Project</td>
<td>Monterey County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-GRN005-GR</td>
<td>Thorne Road Bridge over U.S. 101</td>
<td>Monterey County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-MAR157-MA</td>
<td>Reservation Road/Beach Road Improvements</td>
<td>Marina</td>
<td>CR-2</td>
</tr>
<tr>
<td>MON-SOL044-SO</td>
<td>Pinnacles Bike Route</td>
<td>Soledad</td>
<td>CR-2</td>
</tr>
<tr>
<td>MON-CT011-CT</td>
<td>SR 68 – Commuter Improvements</td>
<td>Monterey</td>
<td>CR-2</td>
</tr>
<tr>
<td>MON-CT017-CT</td>
<td>SR 68 – Holman Highway to access to Community Hospital</td>
<td>Monterey</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-CT030-SL</td>
<td>U.S. 101 – Salinas Corridor</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-CT031-CT</td>
<td>U.S. 101 – South County Frontage Roads</td>
<td>Monterey County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-CT045-MA</td>
<td>SR – Monterey Road Interchange</td>
<td>Marina</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-GRN008-GR</td>
<td>U.S. 101 – Walnut Avenue Interchange</td>
<td>Greenfield</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-MAR136-MA</td>
<td>SR 1 and Imjin Bridge</td>
<td>Marina</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-MAR1556-MA</td>
<td>Imjin Parkway at SR 1</td>
<td>Marina</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SOL014-SO</td>
<td>SR 146 Bypass</td>
<td>Soledad</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>AMBAG Project No.</td>
<td>Project</td>
<td>Location</td>
<td>Impact</td>
</tr>
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</tr>
<tr>
<td>MON-MAR001-MA</td>
<td>Marina – Salinas Corridor</td>
<td>Marina</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS012-SL</td>
<td>Boronda Road Widening</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS029-SL</td>
<td>John Street – U.S. 101</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS035-SL</td>
<td>Lincoln Avenue Widening</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS048-SL</td>
<td>Romie Lane Widening</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS090-SL</td>
<td>Russell Road Extension</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS096-SL</td>
<td>Sanborn Road Extension</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS102-SL</td>
<td>Constitution Boulevard Extension</td>
<td>Salinas</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-GON011-GO</td>
<td>Park and Ride Lot</td>
<td>Gonzales</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-MYC1632-UM</td>
<td>CVMP – Laureles Grade Climbing Lane</td>
<td>Monterey County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-MYC238-UM</td>
<td>Salinas Road Improvements</td>
<td>Monterey County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-OSOL031-SO</td>
<td>Intersection Improvements</td>
<td>Soledad</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-FRA020-MST</td>
<td>Fort Ord Intermodal Centers</td>
<td>Monterey County</td>
<td>CR-2</td>
</tr>
<tr>
<td>MON-KCY035-CK</td>
<td>Multimodal Transportation Center</td>
<td>Monterey County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>MON-SNS077-SL</td>
<td>North Main/Espinosa Road Class II Bike Lane</td>
<td>Salinas</td>
<td>CR-1</td>
</tr>
<tr>
<td>MON-MYC149-UM</td>
<td>Central Avenue</td>
<td>Salinas</td>
<td>CR-1</td>
</tr>
<tr>
<td>SB-COH-A30</td>
<td>Meridian Street Bike Lane</td>
<td>Hollister</td>
<td>CR-2</td>
</tr>
<tr>
<td>SB-SBC-A65</td>
<td>San Benito River Recreational Trail Phase I (Reach 1-3)</td>
<td>San Benito County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-COG-A54</td>
<td>SR 25 Corridor Improvements Project</td>
<td>San Benito County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-CT-A01</td>
<td>SR 156 Widening – San Juan Bautista to Union Road</td>
<td>San Benito County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-CT-A17</td>
<td>Airline Highway Widening/ SR 25 Widening: Sunset Drive to Fairview Road</td>
<td>San Benito County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-CT-A44</td>
<td>Highway 101/25 4-Lane Widening Phase I</td>
<td>San Benito County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-CT-A02</td>
<td>SR 156/Fairview Road Intersection Improvements</td>
<td>San Benito County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-SJB-A01</td>
<td>Roundabout at the Alameda and Fourth Street</td>
<td>San Juan Batista</td>
<td>CR-1</td>
</tr>
<tr>
<td>SB-COH-A11</td>
<td>Union Road (formerly Crestview Drive) Construction</td>
<td>Hollister</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-COH-A18</td>
<td>Westside Boulevard Extension</td>
<td>Hollister</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SC-SBC-A67</td>
<td>Shore Road Extension</td>
<td>San Benito County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-SJB-A07</td>
<td>Third Street Extension</td>
<td>San Juan Batista</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SB-SJB-A09</td>
<td>Connect Lang Street to the Alameda</td>
<td>San Juan Batista</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SC-RTC 27a-RTC</td>
<td>Monterey Bay Sanctuary Scenic Trail Network (Coastal Rail Trail) – Design, Environmental Clearance and Construction</td>
<td>Santa Cruz County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>RTC 30SC</td>
<td>Highway 1 Bicycle/Pedestrian Overcrossing at Mar Vista</td>
<td>Santa Cruz County</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SC-SC-P30-SCR</td>
<td>Murry Street to Harbor Path Connection</td>
<td>Santa Cruz</td>
<td>CR-2, C-3</td>
</tr>
<tr>
<td>SC-SB-P39-SCV</td>
<td>Glenwood Drive Bike Lanes</td>
<td>Scotts Valley</td>
<td>CR-2</td>
</tr>
<tr>
<td>SC-SV-P40-SCVB</td>
<td>Lockwoode Lane Sidewalk and Bike Lanes</td>
<td>Scotts Valley</td>
<td>CR-2</td>
</tr>
<tr>
<td>SC-RTC-24e-RTC</td>
<td>3 - Hwy 1: Auxiliary Lanes from State Park Drive to Park Avenue and from Park Avenue to Bay</td>
<td>Santa Cruz</td>
<td>CR-2, C-3</td>
</tr>
</tbody>
</table>
Table 29 on page 264 of the Draft EIR has been revised to include the following changes:

<table>
<thead>
<tr>
<th>AMBAG Project No.</th>
<th>Project</th>
<th>Location</th>
<th>Impact</th>
<th>Description of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>MON-CT011-CT</td>
<td>SR 68 Commuter Improvements</td>
<td>Monterey</td>
<td>G-1</td>
<td>Potential impacts from ground-shaking</td>
</tr>
<tr>
<td>MON-CT030-SL</td>
<td>U.S. 101 Salinas Corridor</td>
<td>Salinas</td>
<td>G-1</td>
<td>Potential impacts from ground-shaking</td>
</tr>
<tr>
<td>MON-CT015-CT</td>
<td>SR 1 Seaside to Sand City</td>
<td>Monterey</td>
<td>G-1</td>
<td>Potential impacts from ground-shaking</td>
</tr>
<tr>
<td>MON-MAR001-MA</td>
<td>Marina – Salinas Corridor</td>
<td>Marina</td>
<td>G-1</td>
<td>Potential impacts from ground-shaking</td>
</tr>
<tr>
<td>MON-SN405090-SL</td>
<td>Russel Road Extension</td>
<td>Salinas</td>
<td>G-1</td>
<td>Potential impacts from ground-shaking</td>
</tr>
<tr>
<td>MON-FRAW018-SE</td>
<td>Giggling Road</td>
<td>Seaside</td>
<td>G-1</td>
<td>Potential impacts from ground-shaking</td>
</tr>
<tr>
<td>MON-KCY035-C6</td>
<td>Multimodal Transportation Center</td>
<td>King City</td>
<td>G-1</td>
<td>Potential impacts from ground-shaking</td>
</tr>
<tr>
<td>SB-CT-A01</td>
<td>SR 156 Widening – San Juan Bautista to Union Road</td>
<td>San Juan Bautista</td>
<td>G-1, G-3</td>
<td>Potential impacts from fault rupture, ground-shaking and liquefaction</td>
</tr>
<tr>
<td>SB-SBC-A65</td>
<td>San Benito River Recreational Trail Phase I (Reach 1-3)</td>
<td>San Benito County</td>
<td>G-1, G-3</td>
<td>Potential impacts from fault rupture, ground-shaking and liquefaction</td>
</tr>
<tr>
<td>SB-COG-A54</td>
<td>SR 25 Corridor Improvements Project</td>
<td>San Benito County</td>
<td>G-1, G-3</td>
<td>Potential impacts from fault rupture, ground-shaking and liquefaction</td>
</tr>
<tr>
<td>SB-COH-A11</td>
<td>Union Road (formerly Crestview Drive) Construction</td>
<td>Hollister</td>
<td>G-1, G-3</td>
<td>Potential impacts from fault rupture, ground-shaking and liquefaction</td>
</tr>
<tr>
<td>SB-SJB-A08</td>
<td>Lavanigno Drive Construction</td>
<td>San Juan Bautista</td>
<td>G-1, G-3</td>
<td>Potential impacts from fault rupture, ground-shaking and liquefaction</td>
</tr>
<tr>
<td>SC-RTC-24e-RTC</td>
<td>3 - Hwy 1: Auxiliary Lanes from State Park Drive to Park</td>
<td>Capitola</td>
<td>G-1, G-3</td>
<td>Potential impacts from ground-shaking.</td>
</tr>
</tbody>
</table>
Assembly Bill 32

California’s major initiative for reducing GHG emissions is outlined in Assembly Bill 32, the “California Global Warming Solutions Act of 2006,” signed into law in 2006 (Chapter 488, Statutes of 2006). AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB developed a Scoping Plan, which was adopted on December 11, 2009, approving a 1990 statewide GHG level and 2020 limit of 427 MMT CO2e (CARB 2008). The Scoping Plan included measures to address GHG emission reduction strategies related to energy efficiency, water use and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan, which included an adjusted 2020 limit of 431 MMT CO2e (CARB 2014). The 2013 Scoping Plan update defines CARB’s climate change priorities for the next five years and sets the groundwork to reach post-2020 statewide goals. The update highlights California’s progress toward meeting the “near-term” 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluates how to align the State’s longer-term GHG reduction strategies with other State policy priorities, such as for water, waste, natural resources, clean energy and transportation and land use (CARB 2014). CARB updated the Scoping Plan again in late 2017 (see Senate Bill 32, below).

Senate Bill 32

On September 8, 2016, the governor signed Senate Bill 32 into law (Chapter 429, Statutes of 2016), extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). SB 32 became effective on January 1, 2017 and now codifies the 2030 goal set in EO B-30-15. This requires CARB to develop...
technologically feasible and cost-effective regulations to achieve the targeted 40 percent GHG emission reduction.

CARB prepared an update to its AB 32 Scoping Plan to reflect the 2030 target codified in SB 32. The update, titled *California’s 2017 Climate Change Scoping Plan: The Strategy for Achieving California’s 2030 Greenhouse Gas Target* (2017 Scoping Plan) was adopted on December 14, 2017 (CARB, 2017e). The 2017 Scoping Plan identifies how the State can reach its 2030 climate target to reduce GHG emissions by 40 percent from 1990 levels and substantially advance toward its 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels. The 2017 Scoping Plan recommends statewide targets of no more than six metric tons CO$_2$e per capita by 2030 and no more than two metric tons CO$_2$e per capita by 2050. The statewide per capita targets account for all emissions sectors in the State, statewide population forecasts and the statewide reductions necessary to achieve the 2030 statewide target under SB 32 and the longer term State emissions reduction goal of 80 percent below 1990 levels by 2050 under EO-S-3-05. The 2017 Scoping Plan recommends that local governments evaluate and adopt robust and quantitative locally-appropriate goals that align with the statewide per capita targets and the State’s sustainable development objectives and develop plans to achieve the local goals. The statewide per capita goals were developed by applying the percent reductions necessary to reach the 2030 and 2050 climate goals (i.e., 40 percent and 80 percent, respectively) relative to the State’s 1990 emissions limit established under AB 32. CARB released a draft version of the updated Scoping Plan on October 27, 2017, but the updated Scoping Plan has not yet been adopted. Adoption of a final version of the updated Scoping Plan is expected by CARB in late 2017 (CARB 2017d). The draft version of the updated Scoping Plan (CARB 2017e) calls for emissions reductions at the State level that meet or exceed the Statewide GHG target, and notes that additional effort will be needed to maintain and continue GHG reductions to meet the mid- (2030) and long-term (2050) targets.

Page 277 of the Draft EIR has been revised to include the following changes:

However, meeting the goals of SB 375 does not guarantee consistency with AB 32, which is based on regional emissions in 2020. Furthermore, any conflict with AB 32 would likely result in a conflict with SB 32, which extends AB 32 by setting a target of reducing statewide GHG emissions by 40 percent below 1990 levels by 2030. On October 27, 2017, CARB released a draft version of an updated AB 32 Scoping Plan with a framework for achieving the 2030 target set forth by SB 32 (CARB 2017e). On December 14, 2017, CARB adopted the 2017 Scoping Plan (CARB, 2017f). However, the updated Scoping Plan is currently in draft form and has yet to be adopted by CARB. To determine that a project would not conflict with the State’s ability to achieve the SB 32 target, the 2040 MTP/SCS would need to achieve substantial progress toward the long-term reduction target. Mobile source emissions were calculated to determine region-wide GHG emissions with implementation of the 2040 MTP/SCS. If implementation of the 2040 MTP/SCS would achieve substantial progress toward the state achieving the emissions reduction targets established by SB 32, then impacts related to SB 32 would not be considered significant.

Executive Order S-3-05, which sets a goal of reducing GHG emissions to 80 percent below 1990 levels by 2050, is not adopted state policy. Although 2050 is beyond the horizon year of the 2040 MTP/SCS plan, this analysis addresses whether the 2040 MTP/SCS GHG emission would conflict with the state’s ability to achieving the 2040 GHG reduction goal set forth by Executive Order S-3-05. Table 31 summarizes the scenarios analyzed along with the applicable regulations and, for mobile source emissions, vehicle types.
Methodology for Estimating GHG Emissions

GHG emissions from mobile sources were calculated using emission factors from CARB’s EMFAC 2014 model and regional VMT from AMBAG’s Regional Travel Demand Model (RTDM) (refer to the “Modeling Methodology” section in Appendix F to the 2040 MTP/SCS). EMFAC emission factors are established by CARB and accommodate mobility assumptions (e.g., vehicle miles traveled, fleet, speed, time of day) provided by AMBAG’s RTDM, which include socioeconomic growth projections based on AMBAG’s Draft-2018 Regional Growth Forecast. EMFAC also reflects the emissions benefits of recent CARB rules, including on-road diesel fleet rules, Advanced Clean Car Standards and the Smartway/Phase I Heavy Duty Vehicle Greenhouse Gas Regulation (CARB 2014).

Page 282 of the Draft EIR has been revised to include the following changes:

As shown in Table 32, total future (2040) emissions with implementation of the 2040 MTP/SCS would result in fewer GHG emissions as compared to the 2015 AMBAG baseline. As previously discussed, the 2017 Scoping Plan AB 32 Scoping Plan outlines the main State strategies for reducing GHGs to meet the 2030 2020 target. Many of these strategies contribute to reductions from transportation-related emissions at the regional and local levels. In addition, EMFAC 2014 also reflects the emissions benefits of recent CARB rules, including on-road diesel fleet rules, Advanced Clean Car Standards and the Smartway/Phase I Heavy Duty Vehicle Greenhouse Gas Regulation (CARB 2014). Since total regional emissions with implementation of the 2040 MTP/SCS would result in fewer GHG emissions than compared to 2015 conditions, this impact would be less than significant.

Table 33 on page 283 of the Draft EIR has been revised to include the following changes:

<table>
<thead>
<tr>
<th>Table 33</th>
<th>Per Capita Carbon Dioxide Emission Comparison: Passenger Vehicles</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2005 Baseline (per SB 375)</td>
</tr>
<tr>
<td>Modeled Per Capita CO₂ Emissions¹</td>
<td>15.39</td>
</tr>
<tr>
<td>Modeled Reduction from 2005</td>
<td>-7.08%</td>
</tr>
<tr>
<td>EMFACT 2011- EMFAC 2014 Adjustments</td>
<td>-2.80% - 3.00%</td>
</tr>
<tr>
<td>Adjusted per capita GHG reduction from 2005</td>
<td>-4.3%</td>
</tr>
<tr>
<td>Transportation System Management Strategies</td>
<td>N/A</td>
</tr>
<tr>
<td>Transportation Demand Management</td>
<td>N/A</td>
</tr>
<tr>
<td>Increase Work at Home Workers</td>
<td>N/A</td>
</tr>
<tr>
<td>Active Transportation</td>
<td>N/A</td>
</tr>
<tr>
<td>Transit System Enhancement Strategies</td>
<td>N/A</td>
</tr>
<tr>
<td>Zero Emission Vehicles and Electric Charging Infrastructure Development</td>
<td>N/A</td>
</tr>
<tr>
<td>Total % Reduction from 2005</td>
<td>-4.3%</td>
</tr>
</tbody>
</table>
Page 284 of the Draft EIR has been revised to include the following changes:

**Impact GHG-4**

**IMPLEMENTATION OF THE 2040 MTP/SCS WOULD NOT INTERFERE WITH CLIMATE ACTION PLANS FOR THE CITIES OF MONTEREY, CAPITOLA, SANTA CRUZ, GONZALES AND WATSONVILLE, AS WELL AS MONTEREY COUNTY AND SANTA CRUZ COUNTY. HOWEVER, THE 2040 MTP/SCS WOULD CONFLICT WITH THE STATE’S ABILITY TO ACHIEVE THE AB 32, SB 32 AND EO-S-3-05 GHG REDUCTION GOALS. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

The cities of Monterey, Capitola, Santa Cruz, Gonzales and Watsonville, as well as Monterey County and Santa Cruz County, have adopted climate action plans. These plans set goals and targets for the reduction of GHG emissions and outlines policies to help achieve those goals. These local climate action plans have been adopted in an effort to comply with the GHG emissions reduction goals recommended for local governments in the AB 32 Scoping Plan. The 2040 MTP/SCS would not conflict with these local climate action plans.

Although the projects, policies and land use scenarios identified in the 2040 MTP/SCS are designed to align transportation and land use planning to reduce transportation-related GHG emissions, the 2040 MTP/SCS would conflict with the State’s ability to achieve the AB 32 GHG emissions reduction goal. Implementation of the 2040 MTP/SCS would help the region achieve its SB 375 GHG emissions reduction target, thereby contributing to the State’s overall GHG emissions reduction goals identified in AB 32. However, as shown in Table 34, total regional GHG emissions in 2020 would increase by 14.1 percent above 1990 levels. Therefore, the 2040 MTP/SCS would conflict with the State’s ability to achieve the AB 32 GHG emissions reduction goal.

SB 32 has codified the 2030 GHG emissions reduction goals set forth in EO-B-30-15 EO-30-15. On December 14, 2017, CARB adopted the 2017 Scoping Plan, which identifies how the State can reach its 2030 climate target to reduce GHG emissions codified by SB 32 (CARB, 2017e). The 2017 Scoping Plan recommends statewide targets of no more than six metric tons CO₂e per capita by 2030 and no more than two metric tons CO₂e per capita by 2050. The 2017 Scoping Plan recommends that local governments evaluate and adopt robust and quantitative locally-appropriate goals that align with the statewide per capita targets and the State’s sustainable development objectives and develop plans to achieve the local goals.

CARB is currently working to update the Scoping Plan to provide a framework for achieving these 2030 targets, which would assign targets by sector to achieve the GHG emissions reduction goal of 40 percent below 1990 levels by 2030. CARB released a draft version of the updated Scoping Plan on October 27, 2017, but a final updated Scoping Plan has not yet been adopted by CARB (CARB 2017e). Adoption is expected in late 2017 (CARB 2017d), and the adopted final updated Scoping Plan will apply to SCs adopted beginning in 2018. In the absence of an adopted Scoping Plan, this analysis hypothetically assumes that the 2040 MTP/SCS would be required to achieve the same proportional GHG reductions as the state by the year 2030. Since data for 2030 was not available, the 2030 emissions trajectory was estimated using linear regression based on available data for the years 2015 and 2040. As shown in Table 34, implementation of the 2040 MTP/SCS would increase total regional GHG emissions to 13.9
percent above 1990 baseline levels by 2030. Thus, the 2040 MTP/SCS would conflict with the State’s ability to achieve the SB 32 GHG emissions reduction goal.

This analysis does not quantify the GHG emissions for 2050. However, because the 2040 MTP/SCS would conflict with the 2030 goals of SB 32, it is reasonable to expect that Furthermore, the 2040 MTP/SCS would not be on track to be consistent with the state’s ability to achieve the Executive Order S-3-05 goal of 80 percent below 1990s levels by 2050. Therefore, since the 2040 MTP/SCS would conflict with the state’s ability to achieve AB, 32, SB 32 and EO S-3-05 GHG reduction goals, this impact would be significant.

It should be noted that beginning in Fiscal Year 2018, AMBAG will receive SB 1 Sustainable Communities planning funds. With this funding, AMBAG will conduct local and regional multimodal sustainable transportation and land use planning to further the AMBAG’s MTP/SCS goals, contribute to the State’s GHG reduction goals, targets and other sustainability goals. AMBAG will work with local jurisdictions, transportation partner agencies, Caltrans and key stakeholders to develop and implement key components and strategies of the 2040 MTP/SCS. AMBAG will collaborate with local jurisdictions to provide various plans, strategies and data that will be used in the AMBAG 2040 MTP/SCS. As part of this work, AMBAG hopes to establish a framework for conducting local sustainability planning, including but not limited to active transportation plans, housing studies, transit-oriented development and other planning activities that will implement the AMBAG SCS. The SB 1 funding may result in further reductions of the GHG emissions shown in Table 34, as these projections do not incorporate the funding or associated sustainable communities planning.

Page 287 of the Draft EIR has been revised to include the following changes:

**Mitigation Measures**

Mitigation Measures W-4(a) and W-4(b) from As described in Section 4.10, Hydrology and Water Quality, existing federal, state, and local programs and ordinances would require flood prevention measures in new development, including requiring structures to be elevated above the 100-year flood zone and tsunami inundation zones. These regulations would require structures to be elevated one foot above the 100-year flood zone and 10-feet above the ground elevation in areas subject to tsunami. Because sea level rise inundation areas are geographically similar to coastal flood and tsunami hazard areas, these regulations would serve to minimize impacts to some extent.

Page 302 of the Draft EIR has been revised to include the following changes:

**IMPACT HAZ-4**

PROPOSED TRANSPORTATION IMPROVEMENT PROJECTS AND LAND USE PROJECTS INCLUDED IN THE 2040 MTP/SCS WOULD FACILITATE THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIAL, AND MAY RESULT IN REASONABLY FORESEEN UPSET AND ACCIDENT CONDITIONS. MANDATORY COMPLIANCE WITH EXISTING REGULATIONS AND PROGRAMS WOULD MINIMIZE THE RISK ASSOCIATED WITH THESE ACTIVITIES OR ACCIDENT CONDITIONS. Thus, hazards to the public or environment would be less than significant.

Page 305 of the Draft EIR has been revised to include the following changes:

**IMPACT HAZ-5**

PROPOSED TRANSPORTATION IMPROVEMENT PROJECTS AND LAND USE PROJECTS INCLUDED IN THE 2040 MTP/SCS WOULD FACILITATE HAZARDOUS EMISSIONS OR...
Page 306 of the Draft EIR has been revised to include the following changes:

**IMPACT HAZ-6 IMPACT HAZ-3**  
The 2040 MTP/SCS includes land use projects and transportation projects that could occur on previously unknown hazardous material sites or sites on the list compiled by Government Code Section 65962.5. Thus, construction of these projects could create a hazard to the public or environment. Impacts would be significant but mitigable.

Page 308 of the Draft EIR has been revised to include the following changes:

**IMPACT HAZ-7 IMPACT HAZ-4**  
Transportation improvement projects and land use development included in the proposed 2040 MTP/SCS may be located near a public use airport or private airstrip. Existing regulations and regulatory oversight would reduce the inherent hazard of development near airports to safe levels, and impacts would be less than significant.

Page 308 of the Draft EIR has been revised to include the following changes:

**IMPACT HAZ-8 IMPACT HAZ-5**  
Land use development and transportation projects included in the 2040 MTP/SCS could interfere with existing emergency and evacuation. However, required regular updates to emergency response and evacuation plans would account for development and projects. Impacts related to interference or impairment of an adopted emergency response plan or emergency evacuation plan would be less than significant.

Page 309 of the Draft EIR has been revised to include the following changes:

**IMPACT HAZ-9 IMPACT HAZ-6**  
The 2040 MTP/SCS includes land development and transportation projects within areas of moderate, high and very high fire hazard. Infill development emphasized in the 2040 MTP/SCS and existing regulations and programs would reduce the vulnerability of people and structures to wildland fire. However, the risk of loss, injury or death from wildland fire would be possible given the fire hazard across much of the AMBAG region. Impacts would be significant and unavoidable.

Table 35 on pages 311 through 313 of the Draft EIR has been revised to include the following changes:

**Table 35 2040 MTP/SCS Projects that May Result in Increased Transport of Hazardous Materials**

<table>
<thead>
<tr>
<th>AMBAG Project No.</th>
<th>Projects</th>
<th>Location</th>
<th>Impact</th>
<th>Description of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>MON-CT011-CT</td>
<td>SR 68 - Commuter Improvements</td>
<td>Monterey County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>AMBAG Project No.</td>
<td>Projects</td>
<td>Location</td>
<td>Impact</td>
<td>Description of Impact</td>
</tr>
<tr>
<td>------------------</td>
<td>----------</td>
<td>---------------------------</td>
<td>--------</td>
<td>---------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>MON-CT017-CT</td>
<td>SR 68 - (Holman Hwy - access to Community Hospital)</td>
<td>Monterey County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>MON-CT022-CT</td>
<td>SR 156 - Corridor Widening Project</td>
<td>Monterey County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>AMBAG Project No.</td>
<td>Projects</td>
<td>Location</td>
<td>Impact</td>
<td>Description of Impact</td>
</tr>
<tr>
<td>-------------------</td>
<td>----------</td>
<td>------------------------</td>
<td>--------</td>
<td>----------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>MON-CT030-SL</td>
<td>U.S. 101 - Salinas Corridor</td>
<td>Monterey County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>MON-GRN008-GR</td>
<td>U.S. 101 - Walnut Avenue Interchange</td>
<td>Monterey County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SB-COG-A54</td>
<td>State Route 25 Corridor Improvements Project</td>
<td>San Benito County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SB-CT-A01</td>
<td>SR 156 Widening - San Juan Bautista to Union Road</td>
<td>San Benito County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SB-CT-A17</td>
<td>Airline Highway Widening/SR 25 Widening: Sunset Drive to Fairview Road</td>
<td>San Benito County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SB-CT-A44</td>
<td>Highway 25 4-Lane Widening, Phase 1</td>
<td>San Benito County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SC-RTC-24e-RTC</td>
<td>3 - Hwy 1: Auxiliary Lanes from State Park Drive to Park Avenue and from Park Avenue to Bay Avenue/Porter Street</td>
<td>Santa Cruz County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td></td>
<td>4 - Hwy 1: Auxiliary Lanes from Park Avenue to Bay Avenue/Porter Street</td>
<td>Santa Cruz County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SC-RTC-24f-RTC</td>
<td>2 - Hwy 1: Auxiliary Lanes from 41st Avenue to Soquel Avenue and Chanticleer Bike/Ped Bridge</td>
<td>Santa Cruz County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
</tbody>
</table>
Table 37 on page 343 of the Draft EIR has been revised to include the following changes:

<table>
<thead>
<tr>
<th>AMBAG Project No.</th>
<th>Projects</th>
<th>Location</th>
<th>Impact</th>
<th>Description of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>SC-RTC 24r-RTC</td>
<td>94 - Hwy 1: Northbound Auxiliary Lane from San Andreas Road/Larkin Valley Road to Freedom Boulevard</td>
<td>Santa Cruz County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SC-SC-38-SCR</td>
<td>Hwy 1/San Lorenzo Bridge Replacement</td>
<td>Santa Cruz County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
<tr>
<td>SC-SC-P81-SCR</td>
<td>Hwy 1/Mission Street at Chestnut/King/Union Intersection Modification</td>
<td>Santa Cruz County</td>
<td>HAZ-1</td>
<td>Potential impacts from increased capacity on hazardous material routes facilitating additional hazardous material transport</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>AMBAG Project No.</th>
<th>Projects</th>
<th>Location</th>
<th>Impact</th>
<th>Description of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>MON-GRN016-GR</td>
<td>Elm Avenue Bike Lanes</td>
<td>Greenfield</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>MON-KCY039-CK</td>
<td>1st Street Bike Lanes</td>
<td>King City</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>MON-CT022-CT</td>
<td>SR 156 – Corridor Widening Project</td>
<td>Monterey County</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>MON-SNS029-SL</td>
<td>John Street – U.S. 101</td>
<td>Salinas</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>MON-SNS037-SL</td>
<td>Main Street (North) Widening</td>
<td>Salinas</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>MON-SNS094-SL</td>
<td>Hemingway Drive Extension</td>
<td>Salinas</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>MON-KCY043-CK</td>
<td>Roundabout at U.S. 101/Broadway Street/San Antonio Drive</td>
<td>King City</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>SB-CT-A01</td>
<td>SR 156 Widening – San Juan Bautista to Union Road</td>
<td>San Juan Bautista</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>SB-SBC-A50</td>
<td>Hospital Road Bridge</td>
<td>Hollister</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>SB-SBC-A51</td>
<td>Y Road Bridge</td>
<td>San Benito</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>SB-SBC-A52</td>
<td>Union Road Bridge</td>
<td>Hollister</td>
<td>W-4</td>
<td>Potential impacts from flooding</td>
</tr>
<tr>
<td>SC-WAT-P43-WAT</td>
<td>Upper Watsonville Slough Trail</td>
<td>Watsonville</td>
<td>W-4</td>
<td>Potential impacts from flooding and tsunami</td>
</tr>
</tbody>
</table>
### Table 43  2040 MTP/SCS Projects that May Result in Noise/Vibration Impacts

<table>
<thead>
<tr>
<th>AMBAG Project No.</th>
<th>Project</th>
<th>Location</th>
<th>Impact</th>
<th>Description of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>MON-CT011-CT</td>
<td>SR 68 – Commuter Investments</td>
<td>Monterey County</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>MON-SOLO14-SO</td>
<td>SR 146 Bypass</td>
<td>Soledad</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>MON-CT031-CT</td>
<td>U.S. Highway 101 – South County Frontage Roads</td>
<td>Monterey County</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>MON-MST011-MST</td>
<td>Salinas Bus Rapid Transit</td>
<td>Salinas</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>MON-TAMC003-TAMC</td>
<td>Rail Extension to Monterey County</td>
<td>Monterey County</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>SB-CT-A44</td>
<td>Highway 25 4-Lane Widening, Phase I</td>
<td>San Benito County</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>SB-COH-A11</td>
<td>Union Road (formally Crestview Drive) Construction</td>
<td>Hollister</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>SB-COH-A18 A19</td>
<td>Westside Boulevard Extension</td>
<td>Hollister</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
<tr>
<td>SB-SJB-A07</td>
<td>Third Street Extension</td>
<td>San Juan Batista</td>
<td>N-1, N-2, N-4</td>
<td>Potential impacts from construction and operational noise and vibration</td>
</tr>
</tbody>
</table>
### 4.13.1 Setting

This section evaluates the impacts to the regional housing supply and population growth associated with implementation of the 2040 MTP/SCS. The information presented was compiled from multiple sources, including U.S. Department of Housing and Urban Development (HUD), AMBAG’s Draft 2018 Regional Growth Forecast and General Plans and associated EIRs for jurisdictions in the AMBAG region.

#### a. Growth Forecasting

The Draft 2018 Regional Growth Forecast (AMBAG, 2017d) projects the region’s population, housing and employment to 2040. The Draft 2018 Regional Growth Forecast is used to support regional planning efforts such as the Regional Travel Demand Model and the 2040 MTP/SCS as well as local planning such as the development of General Plans and project review.

Developing population, housing and employment forecast estimates for the Monterey Bay region consists of two distinct stages. The first stage is the identification of regional and county level forecast figures through the use of widely accepted forecasting methodologies. The second
Association of Monterey Bay Area Governments

2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

...stage is the disaggregation of county-level forecast numbers to the jurisdictional level and subsequently to the Traffic Analysis Zones (TAZ), using data gathered from jurisdictions (AMBAG 2017a).

Table 44 on page 382 of the Draft EIR has been revised to include the following changes:

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Population</th>
<th>Housing Units</th>
<th>Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monterey County</td>
<td>432,637</td>
<td>139,177</td>
<td>203,550</td>
</tr>
<tr>
<td>Carmel-by-the-Sea</td>
<td>3,824</td>
<td>3,417</td>
<td>2,935</td>
</tr>
<tr>
<td>Del Rey Oaks</td>
<td>1,655</td>
<td>741</td>
<td>359</td>
</tr>
<tr>
<td>Gonzales</td>
<td>8,411</td>
<td>1,987</td>
<td>4,477</td>
</tr>
<tr>
<td>Greenfield</td>
<td>16,947</td>
<td>3,794</td>
<td>7,024</td>
</tr>
<tr>
<td>King City</td>
<td>14,008</td>
<td>3,283</td>
<td>4,441</td>
</tr>
<tr>
<td>Marina</td>
<td>20,496</td>
<td>7,334</td>
<td>6,340</td>
</tr>
<tr>
<td>Monterey</td>
<td>28,576</td>
<td>13,637</td>
<td>34,030</td>
</tr>
<tr>
<td>Pacific Grove</td>
<td>15,251</td>
<td>8,184</td>
<td>5,000</td>
</tr>
<tr>
<td>Salinas</td>
<td>159,486</td>
<td>43,001</td>
<td>64,396</td>
</tr>
<tr>
<td>Sand City</td>
<td>376</td>
<td>176</td>
<td>1,517</td>
</tr>
<tr>
<td>Seaside</td>
<td>34,185</td>
<td>10,913</td>
<td>9,650</td>
</tr>
<tr>
<td>Soledad</td>
<td>24,809</td>
<td>3,927</td>
<td>3,442</td>
</tr>
<tr>
<td>Unincorporated County</td>
<td>104,613</td>
<td>38,783</td>
<td>59,939</td>
</tr>
</tbody>
</table>

San Benito County

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Population</th>
<th>Housing Units</th>
<th>Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hollister</td>
<td>36,291</td>
<td>10,757</td>
<td>13,082</td>
</tr>
<tr>
<td>San Juan Bautista</td>
<td>1,846</td>
<td>750</td>
<td>559</td>
</tr>
<tr>
<td>Unincorporated County</td>
<td>18,308</td>
<td>6,755</td>
<td>4,359</td>
</tr>
</tbody>
</table>

Santa Cruz County

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Population</th>
<th>Housing Units</th>
<th>Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capitola</td>
<td>10,087</td>
<td>5,537</td>
<td>7,062</td>
</tr>
<tr>
<td>Santa Cruz</td>
<td>63,830</td>
<td>23,535</td>
<td>40,986</td>
</tr>
<tr>
<td>Scotts Valley</td>
<td>12,073</td>
<td>4,691</td>
<td>7,475</td>
</tr>
<tr>
<td>Watsonville</td>
<td>52,562</td>
<td>14,131</td>
<td>22,644</td>
</tr>
<tr>
<td>Unincorporated County</td>
<td>135,042</td>
<td>57,327</td>
<td>37,883</td>
</tr>
</tbody>
</table>

AMBAG Total

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Population</th>
<th>Housing Units</th>
<th>Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>762,676</td>
<td>262,660</td>
<td>337,600</td>
</tr>
</tbody>
</table>

Source: AMBAG’s Draft 2018 Regional Growth Forecast.
Table 45  Forecasted AMBAG Population Growth 2015-2040

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Monterey County</td>
<td>432,637</td>
<td>448,211</td>
<td>501,751</td>
<td>69,114</td>
<td>16%</td>
</tr>
<tr>
<td>Carmel-by-the-Sea</td>
<td>3,824</td>
<td>3,833</td>
<td>3,876</td>
<td>52</td>
<td>1%</td>
</tr>
<tr>
<td>Del Rey Oaks</td>
<td>1,655</td>
<td>1,949</td>
<td>2,987</td>
<td>1,332</td>
<td>80%</td>
</tr>
<tr>
<td>Gonzales</td>
<td>8,411</td>
<td>8,827</td>
<td>18,756</td>
<td>10,345</td>
<td>123%</td>
</tr>
<tr>
<td>Greenfield</td>
<td>16,947</td>
<td>18,192</td>
<td>22,327</td>
<td>5,380</td>
<td>32%</td>
</tr>
<tr>
<td>King City</td>
<td>14,008</td>
<td>14,957</td>
<td>16,063</td>
<td>2,055</td>
<td>15%</td>
</tr>
<tr>
<td>Marina</td>
<td>20,496</td>
<td>23,470</td>
<td>30,510</td>
<td>10,014</td>
<td>49%</td>
</tr>
<tr>
<td>Monterey</td>
<td>28,576</td>
<td>28,726</td>
<td>30,976</td>
<td>2,400</td>
<td>8%</td>
</tr>
<tr>
<td>Pacific Grove</td>
<td>15,251</td>
<td>15,349</td>
<td>16,138</td>
<td>887</td>
<td>6%</td>
</tr>
<tr>
<td>Salinas</td>
<td>159,486</td>
<td>166,303</td>
<td>184,599</td>
<td>25,113</td>
<td>16%</td>
</tr>
<tr>
<td>Sand City</td>
<td>376</td>
<td>544</td>
<td>1,494</td>
<td>1,118</td>
<td>297%</td>
</tr>
<tr>
<td>Seaside</td>
<td>34,185</td>
<td>34,301</td>
<td>37,802</td>
<td>3,617</td>
<td>11%</td>
</tr>
<tr>
<td>Soledad</td>
<td>24,809</td>
<td>26,399</td>
<td>29,805</td>
<td>4,996</td>
<td>20%</td>
</tr>
<tr>
<td>Unincorporated County Territory</td>
<td>104,613</td>
<td>105,361</td>
<td>106,418</td>
<td>1,805</td>
<td>2%</td>
</tr>
<tr>
<td>San Benito County</td>
<td>56,445</td>
<td>62,242</td>
<td>74,668</td>
<td>18,223</td>
<td>32%</td>
</tr>
<tr>
<td>Hollister</td>
<td>36,291</td>
<td>39,862</td>
<td>46,222</td>
<td>9,931</td>
<td>27%</td>
</tr>
<tr>
<td>San Juan Bautista</td>
<td>1,846</td>
<td>2,020</td>
<td>2,251</td>
<td>405</td>
<td>22%</td>
</tr>
<tr>
<td>Unincorporated County Territory</td>
<td>18,308</td>
<td>20,360</td>
<td>26,195</td>
<td>7,887</td>
<td>43%</td>
</tr>
<tr>
<td>Santa Cruz County</td>
<td>273,594</td>
<td>281,147</td>
<td>306,881</td>
<td>33,287</td>
<td>12%</td>
</tr>
<tr>
<td>Capitola</td>
<td>10,087</td>
<td>10,194</td>
<td>10,809</td>
<td>722</td>
<td>7%</td>
</tr>
<tr>
<td>Santa Cruz</td>
<td>63,830</td>
<td>68,381</td>
<td>82,266</td>
<td>18,436</td>
<td>29%</td>
</tr>
<tr>
<td>Scotts Valley</td>
<td>12,073</td>
<td>12,145</td>
<td>12,418</td>
<td>345</td>
<td>3%</td>
</tr>
<tr>
<td>Watsonville</td>
<td>52,562</td>
<td>53,536</td>
<td>59,743</td>
<td>7,181</td>
<td>14%</td>
</tr>
<tr>
<td>Unincorporated County Territory</td>
<td>135,042</td>
<td>136,891</td>
<td>141,645</td>
<td>6,603</td>
<td>5%</td>
</tr>
<tr>
<td>AMBAG Total</td>
<td>762,676</td>
<td>791,600</td>
<td>883,300</td>
<td>120,624</td>
<td>16%</td>
</tr>
</tbody>
</table>

Source: AMBAG’s Draft 2018 Regional Growth Forecast.

Table 46 on page 392 of the Draft EIR has been revised to include the following changes:

Table 46  Highway Descriptions and Congestion Issues

<table>
<thead>
<tr>
<th>Highway</th>
<th>Length within AMBAG Region</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Highway 1</td>
<td>139.8 miles</td>
<td>Highway 1 is one of two routes that traverse the entire region, connecting the Monterey Bay Area to Northern and Southern California. This important highway provides the primary access to the region’s...</td>
</tr>
</tbody>
</table>
Highway 1 is designated a California State Scenic Highway from the intersection with State Highway 68 south to the San Luis Obispo County line, a distance of approximately 78 miles. At the Santa Cruz and San Mateo County border, Highway 1 is designated a California State Scenic Highway as it travels north towards San Francisco. Highway 1 changes in character as it moves down the Pacific Coast, from a rural, undivided two lane highway, to a four lane arterial, to a four lane divided highway, and finally to a six lane divided highway.

Congestion issues include commuter traffic around and through the cities of Monterey and Santa Cruz and tourism traffic along its entire length, but especially in the Big Sur and Carmel-by-the-Sea areas.

Portions of Highway 1 have been closed in Monterey County due to mudslides and a collapsed bridge at Pfeiffer Canyon. As of October 23, 2017, the newly constructed Pfeiffer Canyon Bridge has reopened; however, the highway remains closed at Mud Creek due to a substantial landslide and is anticipated to be closed through late 2018 June 1, 2018 (Caltrans, 2017b). However, this temporary lull in operations of Highway 1 is not considered representative of baseline conditions.

State Highway 9

<table>
<thead>
<tr>
<th>Highway</th>
<th>AMBAG Region</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Highway 9</td>
<td>25.7 miles</td>
<td>Highway 9 is a two-lane rural highway as it enters the region from San Mateo County in the Santa Cruz Mountains. It is a 27-mile route between the cities of the Santa Clara Valley and Santa Cruz at its junction with Highway 1. It is considerably curvy and traverses forested areas, which limit travel speeds. Highway 9 serves communities in the San Lorenzo Valley, including Boulder Creek, Ben Lomond, and Felton, and is a heavily used commuter and recreational travel route. A section of Highway 9 has been temporarily reduced to one-way controlled traffic at Western Avenue in Santa Cruz County due to a mudslide removal. This temporary traffic control is expected remain in place until December 31, 2017 (Caltrans, 2017b). This temporary reduction in travel lanes on Highway 9 is not considered representative of baseline conditions.</td>
</tr>
</tbody>
</table>

State Highway 17

<table>
<thead>
<tr>
<th>Highway</th>
<th>AMBAG Region</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Highway 17</td>
<td>12.5 miles</td>
<td>Highway 17 is a four-lane freeway/expressway providing the shortest travel distance between the Santa Clara Valley and Santa Cruz County. Travelers to and from the San Francisco Bay area and Santa Cruz County use Highway 17. The route is heavily used for recreational travel on weekends and for commuter travel on weekdays and is therefore subject to delay. Starting at the Santa Clara/Santa Cruz County line near Summit Road, Highway 17 is a rolling to mountainous road, with slopes from four percent to six percent. Segments along this route are narrow, do not have shoulders, or have a narrow median with guard rail. Highway 17 reached its design capacity of 40,000 vehicles per day in 1968. Although this road does not have signalized intersections, there are several unsignalized intersections with acceleration/deceleration lanes as well as t-intersections with local roads. Just south of Scotts Valley, Highway 17 becomes a freeway with shoulders. The freeway portion terminates at the interchange with Highway 1 in the City of Santa Cruz. The program Safe on 17 has been an effective collaboration between SCCRTC, Caltrans and the California Highway Patrol and local and elected officials to encourage motorists to travel at safe speeds and use caution on Highway 17.</td>
</tr>
</tbody>
</table>
The basic measure of the amount of vehicle travel generated is vehicle miles traveled (VMT). One vehicle traveling one mile constitutes one vehicle mile, regardless of the size of the vehicle or the number of passengers in the vehicle. Increases in VMT are associated with regional growth that would occur with or without the 2040 MTP/SCS. Thus, the VMT data may not reflect deficient traffic operations, although VMT does have a strong correlation with congestion. CVMT measures the number of vehicle miles traveled in the AMBAG region in congested conditions. For the purposes of this EIR analysis, congested conditions are roadways operating at level-of-service (LOS) E and LOS F during peak period. LOS is a qualitative measure describing the operational conditions within a traffic stream. LOS has letter designations ranging from A to F, representing progressively worsening traffic operations, with LOS F being the worst possible operations. According to the AMBAG’s Regional Travel Demand Model (RTDM) (2014), in 2015, there were 499,064 CVMT during peak period in the AMBAG region. AMBAG’s RTDM includes socioeconomic growth projections based on AMBAG’s Draft 2018 Regional Growth Forecast.

Page 398 of the Draft EIR has been revised to include the following changes:

**Santa Cruz County**

Freight rail service, once operated by Southern Pacific Railroad and then by Union Pacific and now Monterey Bay Railway has been a historically important form of transportation within Santa Cruz County. There are currently three rail lines in or adjacent to Santa Cruz County. The Santa Cruz Branch rail line extends from Watsonville junction in Pajaro north to Davenport and passes through much of the county’s urban area. The Santa Cruz Branch line was purchased by the SCCRTC in 2012. The Felton Branch line is owned and operated by the private Santa Cruz Big Trees and Pacific Railway Company. It primarily provides summertime and holiday excursions between Felton and the Beach Boardwalk in Santa Cruz and is also occasionally used for freight. The Coast Rail Route is Union Pacific main coastal line extending from San Jose to San Diego. There is currently no passenger rail service in Santa Cruz County. In 2015 the RTC completed the Santa Cruz Rail Transit Feasibility Study which evaluated the feasibility of adding rail transit service on the Santa Cruz Branch Rail Line between Santa Cruz and Watsonville. The RTC is evaluating the potential use of this rail line, in combination with projects on parallel corridors as part of the Unified Corridor Investment Study to enhance mobility in the region.

Page 398 of the Draft EIR has been revised to include the following changes:

**Rail Freight**

The majority of rail freight service in the region is provided by the Union Pacific Railroad Company and by Iowa Pacific Holdings, which operates in the AMBAG region under the business name of Santa Cruz and Monterey Bay Railway (SCCRTC, n.d.). Agricultural produce and construction materials are the principal rail freight shipments in the region. Freight service is provided (although currently it is seldom used) along the Santa Cruz Branch line, the rail line between Watsonville Junction and the City of Santa Cruz, the Davenport branch line and the Hollister spur. SCCRTC purchased the Santa Cruz Branch line in 2012, between Davenport and Pajaro. Santa Cruz and Monterey Bay Railway continues to operate limited freight service on the rail line and maintain the rail track (SCCRTC, n.d.). It is anticipated that Santa Cruz and Monterey Bay Railroad will continue to provide freight service on the rail line.
Bay Railway will not be the rail service operator much longer and the RTC is currently negotiating with a potential replacement rail service operator.

Page 404 of the Draft EIR has been revised to include the following changes:

On November 27, 2017, the Governor’s Office of Planning and Research transmitted to the California Natural Resources Agency its proposal for updates and amendments to the State CEQA Guidelines. The updates include new Guidelines Section 15064.3, which proposes to replace congestion based metrics, such as auto delay and level of service, with Vehicle Miles Traveled (VMT) as the basis for determining significant impacts, unless the guidelines provide specific exceptions. The California Natural Resources Agency has begun the formal administrative rulemaking process under the Administrative Procedure Act. The rulemaking process may lead to further revisions of the CEQA Guidelines. After completing the rulemaking process, the Secretary for the Natural Resources Agency may adopt the proposed changes to the CEQA Guidelines. In August 2014, the Governor’s Office of Planning and Research circulated its draft changes to the State CEQA Guidelines implementing SB 743 for public comment. Revised draft guidelines were released on January 20, 2016. In addition to new exemptions for projects that are consistent with specific plans, the draft SB 743 guidelines replace congestion based metrics, such as auto delay and level of service, with Vehicle Miles Traveled as the basis for determining significant impacts, unless the guidelines provide specific exceptions. Following any revisions Governor’s Office of Planning and Research deems appropriate, it will submit the draft guidelines to the Natural Resources Agency for commencement of a formal rulemaking process.

Page 408 of the Draft EIR has been revised to include the following changes:

The 2014 RTDM includes detailed transportation and transit networks, as well as a geographically based Traffic Analysis Zone layer containing socioeconomic data for the base year 2015 and forecast years 2020, 2035 and 2040. The forecasted socioeconomic data is based on the AMBAG Draft 2018 Regional Growth Forecast, which is described in detail in Appendix A to the 2040 MTP/SCS. The AMBAG RTDM is calibrated using data from the 2011-2012 California Household Travel Survey (CHTS).

Page 411 of the Draft EIR has been revised to include the following changes:

As shown in Table 48, the 2040 daily vehicle hours of delay would substantially increase above existing conditions in all three counties, as well as the AMBAG region as a whole. As the table shows, at the regional level, the daily hours of vehicle delay would increase by 27,021 hours, which would be an approximately 45 percent increase of existing conditions. This increase is largely a result of projected growth throughout the region by 2040. The AMBAG Draft 2018 Regional Growth Forecast projects the population of the AMBAG region to increase by approximately 16 percent between 2015 and 2040. Thus, some increase in vehicle hours of delay would be unavoidable, regardless of the 2040 MTP/SCS, because more people would live and work in the region in the future. The 2040 MTP/SCS includes projects that would improve overall traffic flow, increase public transit use and encourage more infill development. These types of projects reduce the amount of time motorists are delayed at intersections, reduce the number of vehicles on the road during peak periods and locate people closer to employment centers. Nonetheless, the daily hours of vehicle delays would increase between existing 2015 conditions and 2040 conditions.
Population growth and increased employment in the AMBAG region would also inevitably increase total peak period CVMT. As Table 49 shows, the daily peak period CVMT in the region in 2040 would increase with or without the implementation of the 2040 MTP/SCS. There would be 1,118,524 daily peak period CVMT in 2040 with implementation of the 2040 MTP/SCS. This would be an approximately 149 percent increase compared to existing 2015 conditions. On a per capita basis, as the table also shows, daily peak period CVMT in the region would increase by approximately 0.68 CVMT per person in 2040 compared to 2015, an approximately 115 percent increase over existing conditions (0.59 CVMT per person under existing conditions).

### Table 49  Total Daily Peak Period CVMT

<table>
<thead>
<tr>
<th>Measurement</th>
<th>Existing Conditions (2015)</th>
<th>2040 Conditions with 2040 MTP/SCS</th>
<th>2040 Conditions without 2040 MTP/SCS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total CVMT on Congested Facilities</td>
<td>499,064</td>
<td>1,118,524</td>
<td>1,259,191</td>
</tr>
<tr>
<td>Per Capita CVMT on Congested Facilities</td>
<td>0.59</td>
<td>1.27</td>
<td>1.43</td>
</tr>
</tbody>
</table>

Source: RTDM (AMBAG, 2014b)

Table 50 compares the percentage of commuter trips that are within exceed 30 minutes in duration during the morning peak period (6:00 A.M. to 9:00 A.M.) and evening peak period (4:00 P.M. to 7:00 P.M.). The table provides the existing conditions in 2015, and the 2040 conditions with implementation of the 2040 MTP/SCS for each type of motorized transportation mode in the region. The table also shows the percent of commuter trips within 30 minutes or less in 2040 without implementation for the 2040 MTP/SCS for informational purposes.

### Table 50  Percent of Commuter Trips by Mode Within 30 Minutes - Peak Period

<table>
<thead>
<tr>
<th>Mode</th>
<th>Existing Conditions (2015)</th>
<th>2040 Conditions with 2040 MTP/SCS</th>
<th>2040 Conditions without 2040 MTP/SCS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drive Alone</td>
<td>84.3%</td>
<td>84.5% 84.0%</td>
<td>83.9%</td>
</tr>
<tr>
<td>Carpool</td>
<td>84.3%</td>
<td>84.5% 84.0%</td>
<td>83.9%</td>
</tr>
<tr>
<td>Transit</td>
<td>13.0%</td>
<td>15.8% 14.8%</td>
<td>13.0%</td>
</tr>
</tbody>
</table>

Source: RTDM (AMBAG, 2014b)

Page 415 of the Draft EIR has been revised to include the following changes:

As shown in Table 53, the daily VMT in each county, and the AMBAG region as a whole would increase in 2040 compared to existing 2015 conditions (see Appendix C). The increase, on a regional basis, would be 3,851,598 VMT daily, an approximately 24.3 percent increase of existing daily VMT conditions in 2015. As previously discussed, population growth in the region would inevitably increase daily VMT, regardless of the potential implementation of the 2040 MTP/SCS. However, some of the 2040 MTP/SCS projects that would directly create VMT, separate from unrelated population growth, would include projects that expand public transit fleets. While these types of projects would add daily VMT to the region by introducing new vehicles to the region, they would essentially move more people per VMT than an equivalent number of passenger cars required to move the same number of people. Nonetheless, compared to existing conditions, the daily VMT in the region and each of the three counties...
would increase in 2040 under implementation of the 2040 MTP/SCS. Impacts would be significant.

Page 416 of the Draft EIR has been revised to include the following changes:

c. Specific 2040 MTP/SCS Project That May Result in Impacts

The analysis within this section discusses the potential transportation and circulation related impacts associated with the transportation improvement projects and the land use scenario envisioned by the 2040 MTP/SCS. The projects within the 2040 MTP/SCS are evaluated herein in their entirety and all are intended to improve traffic circulation rather than cause adverse impacts. However, as described above, the 2040 MTP/SCS would increase existing 2015 VMT by approximately 24.3 percent in 2040, as well as increase the daily hours of vehicle delays and the daily CVMT in the region. These effects were found to be significant and unavoidable impacts, as described above. The RTDM data does not have the capability to distinguish which project or projects would specifically result in increased daily VMT, daily hours of vehicle delay, or daily CVMT. However, any number of the 2040 MTP/SCS projects that expand roadway capacity or improve traffic flow and circulation could presumably increase VMT, and any increase in VMT could potentially increase vehicle delays and CVMT. Thus, there are no specific projects that can be listed in this section related to the adverse impacts of increased daily VMT, daily hours of vehicle delays, and daily CVMT in the AMBAG region.

Page 417 of the Draft EIR has been revised to include the following changes:

As discussed above, the 2040 MTP/SCS would also have significant and unavoidable impacts related to an increase in daily VMT in the AMBAG region in 2040. As described above, daily VMT in the AMBAG region is partially due to commuters travelling to and from employment in the adjoining counties, particularly Santa Clara County and San Mateo County in the San Francisco Bay Area. The 2040 MTP/SCS is designed to promote economic growth and employment in the AMBAG region, while also providing the proper balance between jobs and housing within the region. With more employment in the AMBAG region, fewer residents of the region may commute to adjoining counties for employment. Thus, the increased daily VMT in 2040 resulting from the 2040 MTP/SCS may not necessarily be from commuter trips to and from employment destinations outside of the AMBAG region, and the 2040 MTP/SCS may not increase daily VMT on roadways in adjoining counties. Nonetheless, as shown in Table 53, the 2040 MTP/SCS would increase the baseline 2015 conditions for daily VMT by 3,851,598 VMT, which is an approximately 24.3 percent increase over existing conditions. While the majority of the VMT would be expected to remain within the AMBAG region, some portion of the VMT would inevitably extend to areas within adjoining counties to the region. The most reasonable assumption is that VMT to adjoining counties would be concentrated to the most heavily travelled roadways in the counties with the highest relative employment, such as Highway 101 and 17 into Santa Clara County and Highway 1 into San Mateo County. The increased VMT in adjoining areas would contribute to traffic delays and congestion given that increases would be on major commuter routes and heavily travelled roadways in the adjoining counties, and that these counties are also expected to experience increased population growth into the future. Thus, cumulative impacts on traffic operations would be significant and the 2040 MTP/SCS contribution to congestion and traffic in adjoining areas would be cumulatively considerable. Mitigation Measure T-5 would reduce the 2040 MTP/SCS contribution, but it would remain cumulatively considerable.
Page 433 of the Draft EIR has been revised to include the following changes:

Threshold 2 pertains to the congestion management process, which pursuant to federal regulations, is a required part of the metropolitan transportation planning process for regions with one or more urbanized areas with a population of 200,000 or more. Santa Cruz County and San Benito County have opted out of the congestion management planning process because it does not have a single urbanized area with a population of 200,000. Also, AMBAG does not require congestion management planning because the AMBAG region does not have a single urbanized area with a population of 200,000 or greater. However, within the AMBAG region, SBtCOG, SCCRTC and TAMC, all prepare and routinely update RTPs for their respective jurisdictions. The RTPs incorporate the basic principles of the congestion management process, specifically including a list of projects, goals and strategies to reduce and manage congestion on transportation facilities within their jurisdiction. AMBAG has made the congestion management process an integral part of the regional transportation planning process, including the 2040 MTP/SCS. The 2040 MTP/SCS, specifically Appendices B and C of the 2040 MTP/SCS, contains a compilation of the projects proposed in the RTPs prepared by TAMC, SBtCOG and SCCRTC. Thus, the 2040 MTP/SCS is consistent with the congestion management plans and programs of the RTPAs in the region, and impacts related to conflicting with applicable CMPs would be less than significant.

Page 447 of the Draft EIR has been revised to include the following changes:

6.1.1 Employment, Household and Population Growth

According to the AMBAG Draft 2018 Regional Growth Forecast, population in the AMBAG region is projected to grow from 762,676 in 2015 to 883,300 by 2040; an increase of approximately 16 percent. Employment within the region is projected to grow by approximately 57,400 jobs over the same period, an increase of approximately 17 percent. As discussed in Section 4.13, Population and Housing, the proposed projects under the 2040 MTP/SCS are designed and intended to accommodate projected growth up to the year 2040.

Page 453 of the Draft EIR has been revised to include the following changes:

Description

The No Project Alternative includes a land use pattern comprised of existing land use trends. In other words, it assumes that current sub-regional growth trends would continue, but it updates the total growth to be consistent with the updated AMBAG Draft 2018 Regional Growth Forecast. Rather than focusing on coordinating transportation projects that serve infill and transit oriented development, the transportation network would be comprised of committed transportation projects included in the MTIP.

Impact Analysis

a. Aesthetics/Visual Resources

Implementation of this alternative would result in fewer visual impacts as compared to the 2040 MTP/SCS, because many of the proposed interchanges, bridges and roadway extensions, as well as transit and rail facilities would not be constructed. Nevertheless, some many capital improvements would still be constructed under this alternative with the potential to impact scenic vistas on designated scenic highways, along with the gradual transformation toward a more urban/suburban character would occur in many parts of the AMBAG region.
Page 455 of the Draft EIR has been revised to include the following changes:

f. Energy

Because this alternative would result in less construction of transportation infrastructure, overall energy use associated with construction activities would be reduced when compared to the 2040 MTP/SCS. However, this alternative would not include many of the capital improvements envisioned under the proposed 2040 MTP/SCS that would improve transportation efficiency and reduce regional energy demand. Energy use will increase over time as the result of regional socioeconomic (population and employment) growth, regardless of implementation of the 2040 MTP/SCS. The No Project Alternative would result in higher total and per capita energy use as compared to the 2040 MTP/SCS. As discussed in Section 4.6, Energy, the 2040 MTP/SCS would not result in inefficient, unnecessary, or wasteful direct or indirect consumption of energy, and would be consistent with applicable energy conservation policies. Because the No Project Alternative would slightly reduce both total and per capita energy use, impacts would be reduced when compared to the 2040 MTP/SCS and impacts related to inefficient, unnecessary, or wasteful direct or indirect energy consumption would be less than significant.

Page 461 of the Draft EIR has been revised to include the following changes:

f. Energy

The proposed 2040 MTP/SCS land use scenario emphasizes infill and TOD projects that would locate both residents and jobs closer to existing and planned high quality transit, thereby encouraging the use of alternative modes of transit (e.g. buses, rail), walking and bicycling. Improvements that would occur under Alternative 2 would serve a similar purpose; however, the density and intensity of infill development would increase. In addition, this alternative would include greater investments in transit and alternative transportation modes. Given the increased density and focus on transit, this alternative would decrease VMT as compared to the 2040 MTP/SCS: from 19,687,508 daily VMT to 19,678,332 daily VMT, a decrease of approximately 0.045 percent (see Modeling Methodology in Appendix F to the 2040 MTP/SCS).

Page 462 of the Draft EIR has been revised to include the following changes:

Annual GHG emissions during operations of Alternative 2 would be slightly lower (0.01–0.05 percent) than the proposed project (see Modeling Methodology in Appendix F to the 2040 MTP/SCS), ...

Pages 464 and 465 of the Draft EIR have been revised to include the following changes:

n. Transportation and Circulation

Alternative 2 would include a similar range of transportation improvement projects as identified for the proposed 2040 MTP/SCS, with greater priority given to bicycle, pedestrian and local transit connections. Many of these projects are intended to address traffic congestion identified by local agencies in the RTPs, and in many cases would mitigate potential impacts associated with planned long-term development projects. However, others are intended to support improvements along commercial corridors to facilitate access to alternative transportation
modes. Thus, this alternative would decrease daily VMT from 19,687,508 VMT for the 2040 MTP/SCS to 19,678,332 VMT for Alternative 2 – a decrease of approximately 0.045 percent (see Modeling Methodology in Appendix F to the 2040 MTP/SCS). Based on this reduction in daily VMT, potential impacts to transportation and circulation would be less under Alternative 2 and those impacts that do occur may be focused in urban areas rather than suburban or rural areas. Regardless, impacts related to an increase in CVMT and VMT would remain significant and unavoidable. All mitigation measures included in Section 4.14, Transportation and Circulation, would be applicable to Alternative 2. Overall transportation impacts would be less than the 2040 MTP/SCS.

Page 465 of the Draft EIR has been revised to include the following changes:

7.5.1 Description
The Maintained Mobility Alternative incorporates the AMBAG Draft 2018 Regional Growth Forecast (AMBAG, 2017d) and includes a land use pattern comprised of more traditional suburban development compared to the land development envisioned in the 2040 MTP/SCS. The land use pattern in the 2040 MTP/SCS emphasize TOD and development of infill sites in existing urbanized areas of the AMBAG region. The suburban development included under Alternative 3 is less concentrating in urbanized areas or within proximity to transit services, but instead allows for development of open or vacant parcels or parcels with very little existing development on the site, often outside of but near urbanized areas. Suburban residential development is typically at lower density than residential infill development on a dwelling unit per acre basis.

Page 467 of the Draft EIR has been revised to include the following changes:

f. Energy
As discussed under Transportation and Circulation below, Alternative 3 would have similar transportation benefits, particularly related to highway/street operations, as envisioned under the 2040 MTP/SCS. However, it would result in less compact development than the 2040 MTP/SCS. In combination, these changes would result in an increase in VMT: from 19,687,508 daily VMT to 19,785,172 daily VMT, an increase of approximately 0.54 percent (see Modeling Methodology in Appendix F to the 2040 MTP/SCS). More vehicle trips would translate to higher total and per capita energy use as compared to the 2040 MTP/SCS. As discussed in Section 4.6, Energy, the 2040 MTP/SCS would not result in inefficient, unnecessary, or wasteful direct or indirect consumption of energy. When compared to the 2040 MTP/SCS, this alternative would serve to slightly increase the overall consumption of energy, such that impacts would be increased when compared to the 2040 MTP/SCS. However, this alternative would not result in inefficient, unnecessary, or wasteful direct or indirect energy consumption, and impacts would continue to be less than significant.

Page 468 of the Draft EIR has been revised to include the following changes:

Due to the increase of approximately 97,664 VMT, this alternative would increase operational GHG emissions by 0.21% compared to the 2040 MTP/SCS (see Modeling Methodology in Appendix F to the 2040 MTP/SCS).
Page 470 of the Draft EIR has been revised to include the following changes:

**n. Transportation and Circulation**

Alternative 3 would involve a similar range of transportation improvement projects as compared to the 2040 MTP/SCS. However, there is a greater emphasis on roadway improvements in this alternative. Many of these projects would expand capacity, relieve traffic congestion, maintain the local and regional roadways, and in many cases are intended as mitigation measures to reduce potential impacts associated with planned long-term development. Therefore, Alternative 3 would have similar transportation benefits, particularly related to highway/street operations as envisioned under the 2040 MTP/SCS. This alternative does not involve modifications to land use patterns; and therefore, would result in less compact development than the 2040 MTP/SCS. In combination, these changes to the transportation project list and land use scenario would result in slightly higher VMT when compared to the 2040 MTP/SCS: from 19,687,508 daily VMT to 19,785,172 daily VMT, an increase of approximately 0.54 percent (see Modeling Methodology in Appendix F to the 2040 MTP/SCS).

Pages 476 and 477 of the Draft EIR have been revised to include the following changes:


Page 492 of the Draft EIR has been revised to include the following changes:


United States Fish and Wildlife Service (USFWS). 1999. Designated Critical Habitat: Central California Coast and southern Oregon/Northern California Coasts Coho Salmon; Final Rule. 64 FR 24049
Association of Monterey Bay Area Governments

2040 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties


